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EUROPEAN COMMUNITY

PROTECTION OF THE OZONE LAYER
PROTOCOL NEGOTIATIONS - DECEMBER 1986

DISCUSSION PAPER

1. The European Community has taken a number of precautionary measures to limit and reduce CFC emissions, including a production capacity standstill for CFCs 11 and 12. Developing world-wide opinion is now favouring overall controls on CFCs which should be more stringent than current regulatory policies in the context of a global agreement.
2. In the absence of consensus as to an acceptable level of emissions, and in order to reach an early agreement we must therefore consider a pragmatic solution. The best way of doing this would be to develop a staged approach, where the first stage, which is regarded as a matter of some urgency, must be acceptable, understandable, enforceable and capable of early implementation. It must also be designed so as to minimise socio-economic disruption.
3. The following is not a formal EC position but is intended to form the basis of constructive discussion in the Vienna Group of a possible first stage.
4. What is not produced cannot be emitted; therefore a system which regulates production is environmentally effective as well as being easily enforceable. The direct control of emissions is difficult to implement quickly as there are very many sources with different rates of release. At the same time a quota system based on CFC use could be attractive, but relies on detailed trade data which are not available.
5. The first stage, which can be seen as an interim measure, could for existing producers be a limit on production [at 1986 levels] [at a given level of production] to come into effect at a given point in time after entry into force of the protocol. Special provisions must be made for developing countries, but major new investment is unlikely.

6. The substances to be covered in the first stage should be CFCs 11 and 12. The inclusion of any other man-made potential ozone depleting substances for which reliable economic data could be made available should also be considered. (For the EC these would include CFCs 113 and 114). We view with great interest proposals that the different compounds should be weighted according to their ozone depleting potential.
7. A measure of this kind would give producers and users time to readjust while providing an incentive for research and development into CFC recycling and the development of alternatives. The measure should be seen as an interim arrangement which will provide a degree of environmental protection while further scientific, economic and technological insight is obtained. A definite timetable should be set down for a comprehensive review of all these aspects and of the control measures.
8. Just as the first stage reflects what is now seen as desirable and practicable, any future changes will reflect future evaluations of what is desirable and practicable. In the meantime we must ensure that those evaluations are guided by the best possible information.
9. What is desirable depends on a consensus as to acceptable levels of emissions. Scientific knowledge is an important factor in this and relies on the refinement of modelling techniques and on the provision of measurement data. The Vienna Group should consider ways of facilitating the setting up of a monitoring system under the Vienna Convention.
10. We must also improve our understanding of the economics, so that if it were decided that further regulation was required, we would be in a position to act quickly and effectively. Useful data to collect could include production and consumption figures for CFCs and other potential ozone depleting substances, trade in CFCs and downstream products (to be specified) and progress in the development and use of alternatives.