

Department of State
July 16, 1999

Mr. Michael Zammit Cutajar
Secretariat
U.N. Framework Convention on Climate Change (UNFCCC)
Martin-Luther-King Strasse, 8
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Dear Mr. Cutajar:

For many years, the United States has worked with other nations to phase out chlorofluorocarbons under the Vienna Convention and its Montreal Protocol because these substances deplete the Earth's stratospheric ozone layer. While we have made great strides, that phase out is far from complete. For example, only this year are developing countries required to freeze production of CFCs. Significant further efforts on many fronts will be required if the stratospheric ozone layer is to recover, as projected, by about the middle of the next century.

In this regard, HFCs are critical substitutes for CFCs. Their development and use has enabled and continues to enable nations to cease using ozone depleting substances and join the global effort to protect the stratospheric ozone layer. Their continued availability and use remains critical to this effort.

At the same time, HFCs, as well as PFCs and SF6, are potent greenhouse gases with very long resident times in the atmosphere. For this reason, the Kyoto Protocol, which has not yet entered into force, includes these gases in the basket from which developed country Parties will meet their commitments to limit and reduce emissions of greenhouse gases in the period 2008-12.

How those commitments are met will depend on the individual choices of Annex I Parties. The Kyoto Protocol provides each Annex I Party with discretion to determine the strategy most appropriate in its national circumstances.

In light of existing commitments under the U.N. Framework Convention on Climate Change, the United States has been working with industry for some time to promote efforts to reduce emissions of HFCs, as well as PFCs and SF6. We are pleased herewith to make a seven-part submission on "Ways and Means of Limiting Emissions of Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), and Sulfur hexafluoride (SF6)," as invited by Decision 13/CP.4 in FCCC/CP/1998/16/Addendum 1.

This submission discusses on-going voluntary and regulatory programs of the U.S. Environmental Protection Agency to reduce emissions of these gases. Please note that, while sections 608 and 609 of the Clean Air Act require recycling and/or recovery of HFCs used in refrigeration and air conditioning. Congress has not enacted legislation creating general authority to regulate HFCs.

Our submission is being made via facsimile and electronically to ensure its receipt. It consists of seven parts, exclusive of this letter:

- I. Voluntary Partnership for Aluminum (PFCs)
- II. Voluntary Partnership for Electric Utilities <<6

608 609 CCA>> <<7 SNAP CCA 612>> (SF6)

III. Voluntary Partnership for Magnesium (SF6)

IV. Voluntary Partnership for Semiconductors (PFC, HFCs, SF6)

V. Technology process optimization and destruction for HFC-23 byproduct of HFCF-22 manufacture

VI. Sec. 608 and 609 of the Clean Air Act Recycling and Emissions Reduction Program

VII. Sec. 612 of the Clean Air Act Significant New Alternatives Policy (SNAP) Program

If you should have any questions, please contact Mr. Jim Traweek of this office, who can be reached at: (202) 647-3934.

Sincerely,

Jeffrey A. Miotke
Acting Director
Office of Global Change