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EXECUTIVE COMMITTEE OF
THE MULTILATERAL FUND FOR THE
IMPLEMENTATION OF THE MONTREAL PROTOCOL
Eighty-fifth Meeting
Montreal, 25-29 May 2020
Postponed to 19-22 July 2020*

PROJECT PROPOSAL: GUINEA

This document consists of the comments and recommendation of the Secretariat on the following project proposal:

Phase-out

- HCFC phase-out management plan (stage I, third and fourth tranches) UNEP and UNIDO

* Due to coronavirus disease (COVID-19)

Pre-session documents of the Executive Committee of the Multilateral Fund for the Implementation of the Montreal Protocol are without prejudice to any decision that the Executive Committee might take following issuance of the document.

PROJECT EVALUATION SHEET – MULTI-YEAR PROJECTS

Guinea

(I) PROJECT TITLE	AGENCY	MEETING APPROVED	CONTROL MEASURE
HCFC phase out plan (stage I)	UNEP (lead), UNIDO	66 th	35% by 2020

(II) LATEST ARTICLE 7 DATA (Annex C Group I)	Year: 2019	1.93 (ODP tonnes)

(III) LATEST COUNTRY PROGRAMME SECTORAL DATA (ODP tonnes)								Year: 2019	
Chemical	Aerosol	Foam	Fire fighting	Refrigeration		Solvent	Process agent	Lab use	Total sector consumption
				Manufacturing	Servicing				
HCFC-22					1.93				1.93

(IV) CONSUMPTION DATA (ODP tonnes)				
2009 - 2010 baseline:		22.61	Starting point for sustained aggregate reductions:	7.51
CONSUMPTION ELIGIBLE FOR FUNDING (ODP tonnes)				
Already approved:		2.63	Remaining:	4.88

(V) BUSINESS PLAN		2020	Total
UNEP	ODS phase-out (ODP tonnes)	1.41	1.411
	Funding (US \$)	129,950	129,950
UNIDO	ODS phase-out (ODP tonnes)	1.96	1.96
	Funding (US \$)	172,000	172,000

(VI) PROJECT DATA*			2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	TOTAL	
Montreal Protocol consumption limits			N/A	22.61	22.61	20.35	20.35	20.35	20.35	20.35	14.70	14.70	14.70	N/A	
Maximum allowable consumption (ODP tonnes)			N/A	7.51	7.51	6.75	6.75	6.75	6.75	6.75	4.87	4.87	4.87	N/A	
Agreed funding (US \$)	UNEP	Project costs	85,000	0	60,000	0	0	0	0	0	100,000			245,000	
		Support costs	11,050	0	7,800	0	0	0	0	0	0	13,000			31,850
	UNIDO	Project costs	160,000	0	0	0	0	0	0	0	0	125,000			285,000
		Support costs	12,000	0	0	0	0	0	0	0	0	8,750			20,750
Funds approved by ExCom (US \$)	Project costs	245,000	0	60,000	0	0	0	0	0	0	0			305,000	
	Support costs	23,050	0	7,800	0	0	0	0	0	0	0			30,850	
Total funds requested for approval at this meeting (US \$)	Project costs	0	0	0	0	0	0	0	0	0	225,000			225,000	
	Support costs	0	0	0	0	0	0	0	0	0	21,750			21,750	

*Updated Agreement to be considered at the 85th meeting.

Secretariat's recommendation:	Individual consideration

PROJECT DESCRIPTION

Background

1. On behalf of the Government of Guinea, UNEP as the lead implementing agency has submitted a request for funding for the third and fourth tranches of stage I of the HCFC phase-out management plan (HPMP), at a total cost of US \$302,450, consisting of US \$115,500, plus agency support costs of US \$14,950 for UNEP, and US \$160,000, plus agency support costs of US \$12,000 for UNIDO, as originally submitted. The submission includes a progress report on the implementation of the second tranche, the verification report on HCFC consumption for 2014 to 2019, and the annual implementation plan for 2020 to 2022.

Introduction

2. At the 66th meeting, the Government of Guinea submitted stage I of the HPMP for consideration by the Executive Committee.¹ Based on the information collected during the preparation of the HPMP, the Government established as its starting point for sustained aggregate reduction in HCFC consumption, its baseline for compliance (i.e., 22.6 ODP tonnes), calculated using consumption of 21.80 ODP tonnes and 23.40 ODP tonnes reported for 2009 and 2010, respectively, under Article 7 of the Montreal Protocol.

3. At the 72nd meeting, the Government of Guinea submitted the request for the second funding tranche.² While the request should have been submitted together with the verification of the HCFC consumption in 2013, at the time of the submission of the tranche, the verification had not been finalized. Thus, the HCFC consumption reported for 2013 was estimated at 22.6 ODP tonnes (i.e., at the same as the baseline for compliance). In explaining why the verification report was not submitted, UNEP indicated that the consumption data was still being collected and would be available only in May 2014; however, preliminary information indicated that the consumption level would be lower than the estimated consumption of 22.6 ODP tonnes.³ Subsequently to the approval of the second tranche, UNEP submitted the independent verification report, which indicated that the HCFC consumption in 2013 was 7.32 ODP tonnes, 0.24 ODP tonnes above the reported consumption of 7.08 ODP tonnes in 2013⁴ but a three-fold reduction from the consumption of 22.19 ODP tonnes reported in 2012.

4. Between 2013 and 2016 HCFC consumption decreased gradually until 2017, when it decreased by approximately 50 per cent from the previous year; since then, the consumption has been decreasing gradually. The 2011-2019 HCFC consumption is shown in Table 1.

Table 1. HCFC consumption in Guinea (2011-2019 Article 7 data)

HCFC-22	2011	2012	2013	2014	2015	2016	2017	2018	2019	Baseline
Metric tonnes (mt)	446.00	403.56	128.72	124.0	102.72	85.45	43.63	40.00	35.00	411.09
ODP tonnes	24.53	22.19	7.08	6.89	5.65	4.70	2.54	2.20	1.93	22.61

5. An independent verification of the consumption levels of HCFCs for the years 2014 to 2019 was conducted in early 2020 as part of the submission of the funding tranches request of stage I of the HPMP. The verifier concluded that the HCFC consumption reported under Article 7 of the Montreal Protocol and under the country programme (CP) implementation report for those years was correct (as shown in Table 1).

¹ UNEP/OzL.Pro/ExCom/66/37

² UNEP/OzL.Pro/ExCom/72/28

³ Paragraph 7 of document UNEP/OzL.Pro/ExCom/72/28

⁴ The small difference was due to data from importers that had not been included in the data from the NOU.

Delay on the implementation of stage I of the HPMP

6. Since the approval of the second funding tranche, the Government of Guinea was unable to submit the requests for the third tranche (due in 2016) and the fourth tranche (due in 2018) due to the political situation associated with presidential elections in 2015, changes in the national ozone unit (NOU) and the extensive socio-economic impact of the Ebola epidemic.⁵

7. Based on the above facts, the Government of Guinea was able to submit the request for funding for the third and fourth tranches only at the 85th meeting. In discussing the current situation in Guinea, UNEP reassured that the NOU is fully operational, the staff of the unit had received training, including missions from the UNEP Compliance Assistance Programme to the country, and the external issues that caused delays in the submission of the funding tranches had also been resolved. On this basis, UNEP was confident that the Government of Guinea would be able to implement the ongoing activities as well as those associated with the funding tranches being requested at the 85th meeting.

Discussion on the funding request for the third and fourth tranches

8. In reviewing the funding tranche request submitted to the 85th meeting, the Secretariat noted that the HCFC baseline for compliance established by the Government of Guinea was over estimated based on the verified HCFC consumption levels between 2013 and 2019 which were substantially lower than the maximum consumption levels allowed for 2013 to 2019. Upon a thorough analysis of HCFC consumption data and socio-economic factors, and further discussions with UNEP, it was concluded that the starting point for sustained aggregate reduction in HCFC consumption should be revised to 136.50 mt (7.51 ODP tonnes), approximately 10 per cent higher than the average verified consumption of 2013 and 2014.

9. In line with the cost guidelines for stage I of HPMPs (i.e., decision 60/44(f)(xii)), the funding level for stage I of the HPMP for Guinea to achieve the 35 per cent reduction in HCFC consumption by 2020, would have to be adjusted from US \$647,000 (as originally approved) to US \$332,500 (i.e., an adjustment of US \$314,500). Noting that US \$305,000 had already been approved under the first and second tranches, the remaining funding for stage I would be US \$27,500.

10. During the project review process, UNEP explained that the funding of US \$305,000 approved in the first two tranches had already been fully spent, and that several of the activities included in stage I of the HPMP had been planned for immediate implementation soon after the funding is approved. Therefore, reducing the remaining funds for stage I to US \$27,500 would be detrimental for the country as it would stop the momentum recently gained in the implementation of stage I. Furthermore, stage II was not expected to be submitted until 2022, as preparatory funds will only be requested at the 86th meeting.

11. In view of this, and in line with precedent cases, it was agreed to consider at the 85th meeting the third tranche, at the value of US \$225,000 as approved in principle, as the last tranche of stage I of the HPMP, to allow for the completion of ongoing activities. The required reduction of US \$314,500 would take place through the cancellation of the fourth (US \$50,000) and fifth (US \$67,000) funding tranches, and an additional reduction of US \$197,500 from funds from stage II of the HPMP, once it is submitted.

12. On this basis, UNEP on behalf of the Government of Guinea, resubmitted the request for funding for the third and final tranche of stage I of the HCFC phase-out management plan (HPMP), at a total cost of US \$246,750, consisting of US \$100,000, plus agency support costs of US \$13,000 for UNEP, and US \$125,000, plus agency support costs of US \$8,750 for UNIDO. The submission includes a progress

⁵ The Western African Ebola epidemic (2013–2016) was the most widespread outbreak of Ebola virus disease in history, causing major loss of life and socioeconomic disruption in the region, mainly in Guinea, Liberia and Sierra Leone.

report on the implementation of the second tranche, the verification report, and the annual implementation plan for 2020 to 2022.

Report on HCFC consumption

13. HCFC consumption in Guinea has been decreasing since 2013 for various reasons. The political crisis and the Ebola pandemic several years ago reduced the demand of HCFCs; enforcement of the HCFC import/export licensing and quota system together with the training of refrigeration technicians, and the import of non-HCFC-22 based refrigeration and air-conditioning (RAC) equipment further contributed to the reduction on HCFC consumption.

Country programme (CP) implementation report

14. The Government of Guinea reported HCFC sector consumption data under the 2019 CP implementation report that is consistent with the data reported under Article 7 of the Montreal Protocol.

Verification report

15. The verification report confirmed that the Government is implementing a licensing and quota system for HCFC imports and exports, and recommended to strengthen the capacities of customs officers through additional training on the application of national and sub-regional ODS regulations, to equipped customs department with efficient refrigerant identifiers, and to train importers in the use of allocated quotas to avoid discrepancies between the allocated quota and the actual amounts imported.

16. UNEP confirmed that the Government of Guinea will address the recommendations by the verifier during implementation of the third tranche of the HPMP. Training for customs officers had already been provided and will continue during 2020 to 2022; and the provision of additional refrigerant identifiers will also be included in the third tranche.

Progress report on the implementation of the second tranche of the HPMP

Legal framework

17. In addition to the licensing and quota system for HCFC imports, the import of HCFC-based equipment requires prior authorization by the National Ozone Committee to ensure compliance with the regional legislation established under the West African Economic and Monetary Union (UEMOA). Guinea has developed a code of good practices to avoid venting of refrigerants during servicing and maintenance of RAC equipment.

18. The Government of Guinea has confirmed that all controlled substances listed in Annexes A, B and E (except for quarantine and pre-shipment uses) of the Montreal Protocol, are banned for import. All ODS and ODS-based equipment are subject to prior authorization before import, and ODS are included in the list of goods subject to environmental inspections. Moreover, the NOU has a focal point at the port of Conakry to assist the customs officers in the identification of refrigerants and ODS-based equipment when needed. The Government is not aware of any illegal imports, use, presence on the country's market, or stockpiles of ODS already banned.

19. The Government of Guinea ratified the Kigali Amendment to the Montreal Protocol on 5 December 2019.

Refrigeration servicing sector

20. The following activities were implemented during the second tranche:

- (a) A total of 165 customs officers were trained in the identification and control of ODS and ODS-based equipment, and the use of refrigerant identifiers; the training enhanced the capacity of enforcement officers to monitor and prevent illegal trade in ODS; and
- (b) Between 2016 and 2018, 177 technicians were trained in six cities in good refrigeration practices and in the safe handling of flammable refrigerants.

Project implementation, monitoring and reporting

21. Project management is undertaken by the NOU. Other institutions involved in the implementation of the HPMP are the National Ozone Committee, the Centres of Excellence,⁶ the Customs Department, and the Ministry of Trade. During the second tranche, monitoring of project implementation and collection of data was carried out. The NOU recruited two consultants (refrigeration and customs experts) to assist in monitoring the implementation of all HPMP activities. So far, US \$30,000 have been spent on project implementation, monitoring and reporting, including US \$20,000 on staff and consultants and US \$10,000 on monitoring travel. No additional budget is requested for the implementation of the third tranche.

Level of fund disbursement

11. As of March 2020, the total funding of US \$305,000 approved had been disbursed (US \$145,000 for UNEP and US \$160,000 for UNIDO), as shown in Table 2.

Table 2. Financial report of stage I of the HPMP for Guinea (US \$)

Agency	First tranche		Second tranche		Total	
	Approved	Disbursed	Approved	Disbursed	Approved	Disbursed
UNEP	85,000	85,000	60,000	60,000	145,000	145,000
UNIDO	160,000	(*)160,000	0	0	160,000	160,000
Total	245,000	243,981	60,000	60,000	305,000	305,000
Disbursement rate (%)	100		100		100	

* US \$1,019 were returned by UNIDO at the 80th meeting of the Executive Committee

Implementation plan for the third and final tranche of the HPMP

22. The following activities will be implemented between June 2020 and July 2022:

- (a) Six training workshops on identification and control of HCFCs and HCFC-based equipment for 120 customs and enforcement officers; development of a training manual to support training of customs officers and a simplified booklet to facilitate customs' clearance of imported refrigerants and RAC equipment; and signature of a memorandum of understanding with the customs authority to ensure the sustainability of the customs training programme (UNEP) (US \$50,000);
- (b) Seven training sessions on good refrigeration service practices for an additional 175 RAC technicians; introduction of good refrigeration practices and the safe use of flammable or toxic refrigerants into the curriculum of the main RAC training schools; existing training materials developed by UNEP will be adapted in cooperation with the RAC association

⁶ Vocational training institutions and a few large repair workshops have been identified to serve as centres for training of technicians and management of equipment for the technicians in the regions.

(UNEP) (US \$50,000); and

- (c) Procurement of additional equipment and tools for training centres and refrigeration workshops (e.g., 15 containing portable recovery machines, multi-refrigerant identifiers, vacuum pumps, portable refrigerant charging units, vacuum gauge, charging scale, leak detectors, refrigerant cylinders, soldering kit, oil testing kit, and a reclamation unit), and training of beneficiaries in the use of the equipment through the centres of excellence (UNIDO) (US \$125,000);

SECRETARIAT'S COMMENTS AND RECOMMENDATION

COMMENTS

Legal framework

23. The HCFC quota for 2020 has been issued at 1.65 ODP tonnes, which is below the maximum allowable consumption for 2020 and the Montreal Protocol targets.

Revision of the Agreement

24. During project review process, UNEP indicated that the Government of Guinea endorsed a revision of the starting point for aggregate reduction on HCFC consumption from 22.6 ODP tonnes to 7.5 ODP tonnes, with a remaining consumption eligible for funding of 4.87 ODP tonnes. Accordingly, the 2015 and 2020 maximum allowable consumption target would be revised to 6.75 ODP tonnes and 4.87 ODP tonnes, respectively.

25. In line with the cost guidelines for stage II of HPMPs (i.e., decision 74/50(c)(xii)) the maximum eligible remaining funding to achieve the complete phase-out of HCFCs would be US \$420,000, noting that US \$530,000 had already been approved in stage I of the HPMP.

26. Accordingly, the Agreement between the Government of Guinea and the Executive Committee will be updated as follows:

- (a) In paragraph 1, the maximum allowable consumption target by 2020;
- (b) In Appendix 1-A, the revised starting point;
- (c) In Appendix 2-A, the revised maximum allowable consumption targets for stage I, the revised third tranche, the cancellation of the fourth and fifth tranches, the extension to 31 July 2022, and the updated remaining eligible consumption;
- (d) In Appendix 2-A, in addition to the updates above, in line with decisions 66/17(c) and 67/15(b)(i), the agency fee for the UNIDO tranche of the HPMP for Guinea will be adjusted to 7 per cent to reflect the administrative cost regime adopted at the 66th meeting;⁷ and
- (e) In Appendix 7-A, the reduction for funding for failure to comply will be updated to the value applied to all low-volume consuming countries (i.e., US \$180/kg).

27. Annex I to the present document presents the updates mentioned in paragraph 26 and also includes a new paragraph 16 of the Agreement indicating the updated Agreement supersedes that reached between

⁷ This adjustment was not done at the second tranche approved at the 72nd meeting because that tranche did not include a UNIDO component.

the Government and the Executive Committee at the 66th meeting. The full revised Agreement will be appended to the final report of 85th meeting.

Sustainability of the HCFC phase-out

28. To ensure the sustainability of the HPMP activities over time, the NOU will work with the leading RAC training school to introduce into its curriculum the good refrigeration practices and the safe use of flammable or toxic refrigerants. The training of refrigeration technicians combined with the use of equipment and tools that will be procured, will allow for the recovery and reuse of refrigerants and reduction of leakage of refrigerants during maintenance and repair of RAC equipment, reducing the consumption of HCFC-22 and the safe management of alternative refrigerants. While the current situation of the RAC sector in the country does not allow the establishment of a certification scheme at present, the Government will continue strengthening the training institutes, the refrigeration centres of excellence in the country and the air-conditioning technicians' association.

Gender policy implementation⁸

29. With regard to the implementation of gender mainstreaming, the NOU will start working under stage I to promote women's attendance at training workshops, and to raise awareness of the need for gender-friendly work environments. This work will continue under stage II of the HPMP.

Conclusion

30. The HCFC consumption of Guinea in 2019 was 1.92 ODP tonnes, which is 72 per cent below the 2019 allowed consumption of 6.75 ODP tonnes. The Government of Guinea has a licensing and quota system for the control of HCFC imports and exports, which has been instrumental in controlling imports of HCFCs into the country. The funding level and strategy of stage I of the HPMP have been adjusted to reflect a revised starting point that accurately reflects the level of HCFC consumption in the country. After a delay caused by several external reasons including the political instability and the Ebola pandemic several years ago, and changes of NOU staff, the NOU is fully operational; there is continued training for customs and enforcement officers, as well as servicing technicians, along with a reinforcement of the main RAC training school and the centres of excellence. The project has reported 100 per cent disbursement from the previous approved tranches and the approval of the third tranche will maintain the momentum of all ongoing activities. Stage I of the HPMP will be extended seven months until July 2022 on the understanding that stage II of the HPMP will not be submitted earlier than 2022.

31. The Secretariat is submitting the request for the third and final tranche of the HPMP for Guinea for individual consideration given the changes to the Agreement between the Government and the Executive Committee, i.e., adjustment to the starting point for aggregate reduction on HCFC consumption; adjustment to the overall funding levels, cancellation of the fourth and fifth tranches, and extension of the completion date to July 2022. The Secretariat noted that the changes proposed to stage I of the HPMP had been fully agreed with UNEP, the lead implementing agency, and that all technical and cost issues had been satisfactorily addressed. Implementation of the third tranche of the HPMP, as revised, will allow the Government of Guinea to finalize the activities planned under stage I.

⁸ Decision 84/92(d) requested bilateral and implementing agencies to apply the operational policy on gender mainstreaming throughout the project cycle.

RECOMMENDATION

32. The Executive Committee may wish to consider:

(a) Noting:

- (i) The progress report on the implementation of the second tranche of stage I of the HCFC phase-out management plan of (HPMP) for Guinea;
- (ii) That the Fund Secretariat had updated paragraph 1, Appendices 1-A, 2-A and 7-A of the Agreement between the Government of Guinea and the Executive Committee, based on the revised starting point and funding level, and that a new paragraph 16 had been added to indicate that the updated Agreement superseded that reached at the 66th meeting, as contained in Annex I to the present document;
- (iii) That the revised starting point for sustained aggregate reduction in HCFC consumption was 7.51 ODP tonnes, estimated on the basis of the historical consumption included in the verification report submitted to the 85th meeting, that the revised funding level for stage I of the HPMP for Guinea was US \$332,500 plus agency support costs, in accordance with decision 60/44(f)(xii) and that a deduction of US \$117,000 had been applied to reflect the cancellation of the fourth and fifth tranches of stage I and that a deduction of US \$197,500 would be applied when stage II of the HPMP was approved;

(b) Approving:

- (i) The extension of stage I of the HPMP up to 31 July 2022, on the understanding that stage II of the HPMP would not be submitted earlier than 2022; and
- (ii) The third tranche of stage I of the HPMP for Guinea, and the corresponding 2020-2022 tranche implementation plan, at the amount of US \$246,750, consisting of US \$100,000, plus agency support costs of US \$13,000 for UNEP; and US \$125,000, plus agency support costs of US \$8,750 for UNIDO.

Annex I

TEXT TO BE INCLUDED IN THE UPDATED AGREEMENT BETWEEN THE GOVERNMENT OF GUINEA AND THE EXECUTIVE COMMITTEE OF THE MULTILATERAL FUND FOR THE REDUCTION IN CONSUMPTION OF HYDROCHLOROFLUOROCARBONS

(Relevant changes are in bold font for ease of reference)

1. This Agreement represents the understanding of the Government of Guinea (the “Country”) and the Executive Committee with respect to the reduction of controlled use of the ozone depleting substances (ODS) set out in Appendix 1-A (“The Substances”) to a sustained level of **4.87** ODP tonnes by 1 January **2022** in compliance with Montreal Protocol schedules.

16. This updated Agreement supersedes the Agreement reached between the Government of Guinea and the Executive Committee at the 66th meeting of the Executive Committee.

APPENDIX 1-A: THE SUBSTANCES

Substance	Annex	Group	Starting point for aggregate reductions in consumption (ODP tonnes)
HCFC-22	C	I	7.51

APPENDIX 2-A: THE TARGETS, AND FUNDING

Row	Particulars	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
1.1	Montreal Protocol reduction schedule of Annex C, Group I substances (ODP tonnes)	n/a	22.61	22.61	20.35	20.35	20.35	20.35	20.35	14.70	14.70	14.70	n/a
1.2	Maximum allowable total consumption of Annex C, Group I substances (ODP tonnes)	n/a	7.51	7.51	6.75	6.75	6.75	6.75	6.75	4.87	4.87	4.87	n/a
2.1	Lead IA (UNEP) agreed funding (US \$)	85,000	0	60,000	0	0	0	0	0	100,000	0	0	245,000
2.2	Support costs for Lead IA (US \$)	11,050	0	7,800	0	0	0	0	0	13,000	0	0	31,850
2.3	Cooperating IA (UNIDO) agreed funding (US \$)	160,000	0	0	0	0	0	0	0	125,000	0	0	285,000
2.4	Support costs for Cooperating IA (US \$)	12,000	0	0	0	0	0	0	0	8,750	0	0	20,750
3.1	Total agreed funding (US \$)	245,000	0	60,000	0	0	0	0	0	225,000	0	0	530,000
3.2	Total support costs (US \$)	33,050	0	7,800	0	0	0	0	0	21,750	0	0	62,600
3.3	Total agreed costs (US \$)	278,050	0	67,800	0	0	0	0	0	246,750	0	0	592,600
4.1.1	Total phase-out of HCFC-22 agreed to be achieved under this Agreement (ODP tonnes)												2.63
4.1.2	Phase-out of HCFC-22 to be achieved in previously approved projects (ODP tonnes)												n/a
4.1.3	Remaining eligible consumption for HCFC-22 (ODP tonnes)												4.87

*Stage I of the HPMP was approved at a funding level of up to US \$647,000, based on an estimated consumption of 22.6 ODP tonnes. However, the funding level associated with stage I of the HPMP should be up to US \$332,500, based on a revised starting point for sustained aggregate reduction in HCFC consumption of 7.51 ODP tonnes. The funding adjustment will be made when stage II of the HPMP is approved.

APPENDIX 7-A: REDUCTIONS IN FUNDING FOR FAILURE TO COMPLY

1. In accordance with paragraph 11 of the Agreement, the amount of funding provided may be reduced by US \$180 per ODP kg of consumption beyond the level defined in row 1.2 of Appendix 2-A for each year in which the target specified in row 1.2 of Appendix 2-A has not been met.