

**WRITTEN VIEWS SUBMITTED BY ITALY CONSTITUENCY
PURSUANT TO DECISION 93/103**

1. Italy and its co-opted constituency members Germany, France, and the United Kingdom of Great Britain and Northern Ireland welcome the opportunity to engage informally with other Executive Committee members to exchange ideas on strategic long-term approaches to the implementation of the Kigali Amendment.

2. We suggest putting the focus first on compliance-related measures that can be further adopted by the Article 5 countries for better implementation of both the HCFCs phase-out and HFCs phase-down before elaborating on new measure that are not related to compliance. In this regard, we consider early action, better integration of the parallel implementation of HCFC phase-out and HFC phase-down related activities, and ensuring that the Multilateral Fund (MLF) funded projects lead to actual and sustainable HFC reductions in overall consumption as key aspects that require further attention. Preventing leaks from existing equipment is the prime goal in the servicing sector. In line with our commitment to ozone and climate protection, we propose the following measures to strengthen the existing legal framework in Article 5 countries.

- Implementation of minimum training and certification regimes for personnel working on equipment and machinery that contains HFCs or their alternatives.
- Implementation of periodic maintenance and leak prevention of equipment and machinery by such trained and certified personnel, including the establishment of a registry.
- Improved management of the ODS-HFC cycle, including better control of the placing on the market and the proper take back of unwanted ODS/HFC substances by authorized dealers, with a clear track of their destination (recycling, reclaiming, or destruction).
- Development of mandatory sanctions for those who do not properly manage the ODS/GWP during their life cycle.

3. In light of the recent adoption of the EU F-gas regulation aiming for a complete phase-out of the consumption of virgin HFCs by 2050, we emphasize the importance of the long-term perspective of the HFC phase-down. Conversions in the manufacturing sector from high-GWP HFCs to alternatives that minimise as much as possible adverse effects to the environment support this goal. The long-term cost effectiveness needs to be evaluated, including the avoidance of further conversions as the HFC phase-down progresses. Alternatives should be assessed for their long-term accessibility, availability, sustainability, safety, and other environmental impacts. We would like to discuss suitable incentives to support such strategic conversions.

4. Given the increasing urgency of addressing the climate component, we emphasize the need for domestic strategies that minimize the use of higher GWP alternatives. We advocate for a clear map of alternatives in Art 5 countries, including their real availability and current prices, to minimize the use of higher GWP alternatives and promote sustainability. Collaboration with implementing agencies to assess alternatives and their availability is crucial in this context. To further promote the uptake of alternatives, coordination of international and national levels between the different institutions and focal points involved in energy, climate, waste management, and climate finance, should be strengthened and integrated in the implementation of the HFC phase-down.

5. We recognize the importance of energy efficiency in the manufacturing and servicing sectors during the phase-down of HFCs. This represents an innovative way to synergize with climate efforts under the MLF. We express our interest in discussing sustainable cooling as a means to replace traditional refrigeration with more energy-efficient and sustainable solutions. This aligns with the goal of reducing CO₂ emissions and contributes to the overall efforts in HCFCs phase-out/HFCs phase-down and sustainable cooling. Projects under the current funding window provide excellent opportunities to gather experiences, which will inform the further operationalization of such project funding. We put specific emphasis on how to support the utilization of non-fluorinated alternatives for highly efficient equipment and the accountability of GHG emission reduction.

6. As a responsible party to this multilateral environmental agreement, we are fully committed to contributing to these critical discussions and taking concrete actions to protect the environment and combat climate change.
