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Ninety-ninth Meeting
Montreal, 7–11 December 2026
Items 9(c) and (d) of the provisional agenda[1]

PROJECT PROPOSALS: THE COMOROS

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

Energy efficiency		
• Additional activities to maintain energy efficiency in refrigeration-based appliances (decision 89/6)	UNEP	Blanket approval
Phase-down		
• Kigali HFC implementation plan (stage I, first tranche)	UNEP and UNIDO	Individual consideration

[1] UNEP/OzL.Pro/ExCom/99/1

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 DESCRIPTION

1. Stage II of the HCFC phase-out management plan (HPMP) for the Comoros was approved at the 94th meeting[2] to completely phase out HCFC consumption by 2030, in the amount of US $427,500, plus agency support costs, for UNEP. The second tranche of the HPMP was planned for submission to the first meeting of 2026, as per the Agreement between the Government of the Comoros and the Executive Committee, but it was rescheduled to 2027.

2. On behalf of the Government of the Comoros, UNEP, as the designated implementing agency, has submitted a request for funding additional activities for maintaining energy efficiency in refrigeration-based appliances in line with decisions 89/6(b) and 92/22,[3] in the amount of US $100,000, plus agency support costs of US $13,000.[4] The submission includes a description of proposed activities, targets, and an implementation plan from January 2027 to December 2028.

Report on HCFC consumption

3. The Government of the Comoros reported under both the Article 7 data and the country programme (CP) implementation report a consumption of 0.02 ODP tonnes of HCFCs in 2025, which is 81.9 per cent below the country's HCFC baseline for compliance. The 2021-2025 HCFC consumption is shown in table 1.

Table 1. HCFC consumption in the Comoros (2021–2025 Article 7 data)

HCFC-22	2021	2022	2023	2024	2025	Baseline
Metric tonnes (mt)	0.70	0.60	0.51	0.49	0.45	2.48
ODP tonnes	0.04	0.03	0.03	0.03	0.02	0.14

4. The only HCFC consumed in the country is HCFC-22 in the refrigeration and air-conditioning (RAC) servicing sector. Consumption over the last five years has been steadily decreasing and remained below the Montreal Protocol control targets.

Project description

5. The Union of Comoros consists of three main islands: Ngazidja (Grande Comore), Anjouan, and Mohéli, located in the Indian Ocean off the eastern coast of Africa. With a population of approximately 850,000, the country's economy depends primarily on agriculture, remittances, and a small services sector, with very limited domestic industrial production. Tropical climate characterised by high humidity and temperatures accounts for high demand for RAC equipment across sectors, especially in residential air-conditioning (AC), domestic and commercial refrigeration, public and Government buildings, and the hospitality sector. All RAC equipment and refrigerants are imported into the country; there is no domestic manufacturing capacity. This, *inter alia*, makes import controls the primary lever for market transformations towards more efficient RAC equipment using refrigerants with low global-warming potential (GWP).

6. Comoros is a member of the Southern African Development Community (SADC), which has regional minimum energy performance standards (MEPS) and energy labels for non-ducted single-split air conditioners up to 16 kW and residential refrigerators with the capacity of between 10 and 1,500 litres, with two tiers of performance standards (introduced in 2024 and 2027, respectively). Air conditioners must meet

[2] Decision 94/27 and document UNEP/OzL.Pro/ExCom/94/30

[3] Decision 92/22 allows for the submission of requests for activities referred to in decision 89/6(b) separately from HPMP tranche requests, including a revised Agreement between the Government of the Article 5 country concerned and the Executive Committee, on the understanding that those activities were integrated into the ongoing tranche implementation plans.

[4] As per the letter of 4 September 2026 from the Ministry of Ministry of Production, Environment, Energy, Industry and Handicrafts of the Comoros to the Secretariat.

performance requirements based on the Cooling Seasonal Performance Factor and use refrigerants with GWP below 750 (150 for portable units). Refrigerators must use refrigerants with GWP under 20. The Comoros has not yet established any national MEPS for RAC appliances or energy-labelling programmes, nor does it have a formal policy instrument for energy efficiency in the RAC sector. There are currently no mechanisms in place to track the efficiency levels of imported appliances, no product registration systems, no active projects targeting energy efficiency in the RAC sector, and no formal coordination on RAC energy efficiency. The Government of the Comoros committed to ban the import of HCFC-based equipment by 1 January 2027.

7. This project seeks to build the groundwork to support future MEPS and labelling programmes for RAC equipment in the country while strengthening customs trainings and piloting a product registration database to check for energy efficiency in imported appliances. The project's three main objectives are: facilitating coordination and building evidence to support future national MEPS and labelling; strengthening the customs' capacity with regard to RAC equipment and refrigerant import controls, including energy efficiency; and piloting a product registration database for RAC equipment as a foundation for market surveillance and future compliance. The description and proposed cost breakdown of activities to maintain energy efficiency in the sector are presented in table 2.

Table 2. Activities, expected outputs and funding requested for the project to maintain energy efficiency for the servicing sector in the Comoros (as submitted and adjusted)

Activity	Performance indicators	Original cost (US $)	Adjusted cost (US $)
Component 1: Coordination and evidence-building to support national MEPS and labelling for RAC			
Activity 1.1: Enhance coordination among key national stakeholders	1.1.1: Establishment of a coordination group led by the national ozone unit (NOU) under the Ministry of Environment and Tourism, with relevant ministries and stakeholders supporting border control for products, appliance and equipment importers and wholesalers 1.1.2: Coordination with the national Technical and Vocational Education and Training institutions to ensure that MEPS and labelling schemes also enable jobs and reskilling opportunities 1.1.3: Organization of meetings and dedicated sessions with technical experts to review the regional MEPS and labelling frameworks and assess their feasibility for national adoption, operationalisation, and implementation, especially SADC HT 110:2023 (MEPS for Air Conditioners) and SADC HT 111:2023 (MEPS for Refrigerating Appliances)	13,000	13,000
Activity 1.2: Develop a coordinated policy and regulatory roadmap	1.2.1: Development and publishing of a regulatory roadmap to support the adoption of SADC regional MEPS and full-scale implementation of labels, outlining the roles and responsibilities of relevant Ministries and agencies and providing an implementation timeline, in collaboration with the stakeholder coordination group	10,000	10,000
Activity 1.3: Assessment of energy-efficient cooling	1.3.1: Hiring of an expert to develop and publish an assessment of the country's projected demand for RAC equipment and its energy-efficiency levels	10,000	0
Revised Activity 1.3: Market assessment of RAC equipment, annual imports and growth, brands and models	Revised 1.3.1: Nationwide market survey to collect and analyze data on RAC equipment and to establish a baseline for the RAC market in Comoros, providing detailed information on import trends, market size and penetration, technology characteristics, refrigerant use, and energy-efficiency performance	0	12,000
Subtotal		**33,000**	**35,000**

Activity	Performance indicators	Original cost (US $)	Adjusted cost (US $)
Component 2: Strengthening the customs' capacity on RAC equipment and refrigerant import controls			
2.1: Training material	2.1.1: Development of training material including harmonized system (HS) codes for HFCs (2022 revision), refrigerant identification, import licensing procedures for ODSs and HFCs, and introduction to energy-efficiency labels and product performance data as future compliance tools; 2.1.2: Development of a market-monitoring checklist, standard operating procedures and guidelines for product registration and verification for customs officials in line with the pilot product registration database; 2.1.3: Development of a practical field guide in French (and Comorian where feasible) covering key refrigerant identification procedures, common smuggling schemes, and documentation checks for equipment imports in support of stage II of the HPMP and new import controls to be implemented from 1 January 2027	12,000	0
2.2: Training workshops	2.2.1: Organization of at least three workshops for clearing and forwarding agents, customs officers and retailers (60 participants in total, including at least 15 women) on the RAC and heat pump nameplate data and handling and resolving discrepancies in support of the pilot product registration database	10,000	0
Subtotal		**22,000**	**0**
Revised Component 2: Capacity building and south-south cooperation through experience sharing			
2.1: Organize a study tour to a selected regional country with well-established MEPS	2.1.1: Organization of a study tour or experience-sharing visit for key national stakeholders to a selected regional country with successful MEPS implementation; and development of a comprehensive report on best practices and lessons learned from regional experiences, tailored to inform the design and implementation of the national MEPS and labelling framework	0	12,000
Subtotal		**0**	**12,000**
Component 3: Development of a pilot product registration database for RAC equipment			
3.1: Design of the product information database	3.1.1: Cross-checking of the equipment importer population based on customs data and defining the scope, institutional home and minimum requirements for the database; establishment of the data recording workflow under which importers submit product model information to the NOU prior to first importation; and definition of the customs' role as a shipment verification and data collection point; 3.1.2: Assessment of whether importer registration can be made obligatory through amending the existing import licensing conditions or whether a separate administrative instrument is required; and review of the United for Efficiency (U4E) open-source product registration system (PRS) prototype and comparable tools as design references for the pilot form and potential assets for scaling up	8,000	12,000
3.2: Registration form development, database, and guidance materials	3.2.1: Development of a digital data collection form for importer submission to the NOU (structured spreadsheet template or simple online form) covering equipment brand, model, product category, refrigerant type and charge, energy-efficiency rating and labelling information where available, country of origin and importer details;	15,000	15,000

Activity	Performance indicators	Original cost (US $)	Adjusted cost (US $)
	3.2.2: Establishment of a central NOU product database to consolidate and maintain records, and development of a customs verification checklist for cross-checking shipments against the database; and development of user guidance materials for importers, NOU staff, and customs officers		
3.3: Running and analysis of the pilot scheme	3.3.1: Piloting the product information database registration system with a defined category of RAC products in coordination with major importers and customs offices on at least one island; 3.3.2: Analysis of pilot data to produce a market intelligence report on the efficiency profile of imported RAC equipment; 3.3.3: Evaluation of the pilot, including validation workshops, documentation of lessons learned, and development of a scale-up roadmap for full national implementation of the registration system, including the assessment of the U4E PRS prototype as the technical platform for future compliance-oriented system once the MEPS are established	22,000	26,000
Subtotal		**45,000**	**53,000**
Total		**100,000**	**100,000**

SECRETARIAT'S COMMENTS AND RECOMMENDATION

COMMENTS

8. The Secretariat has reviewed the project proposal in line with decisions 89/6(b) and 92/22 and sought additional information from UNEP on selected elements of the project.

Eligibility under decisions 89/6 and 92/22

9. Proposed activities are in line with the eligibility criteria listed in decision 89/6(b)(iii), since they include the creation of a coordination group to consider the regional SADC MEPS and labelling schemes applied in neighboring countries, and the preparation of a regulatory roadmap to support the adoption of the SADC regional MEPS and full-scale implementation of labels in the Comoros; and those in decision 89/6(b)(v), since they include a pilot project to develop a product information database to capture key product data, including refrigerant type, charge, and available efficiency data supporting future market surveillance, MEPS and labelling implementation, and informed public procurement. The pilot project would lay the groundwork for a scaled-up roadmap for full national implementation of the registration system, including the assessment of the U4E product registration system prototype as the technical platform for a future compliance-oriented system once MEPS are established. In line with decision 92/22, this project was submitted separately from the upcoming HPMP tranche request, planned for submission to the first meeting of 2026 but later rescheduled to 2027 (see paragraph 67).

Technical and cost-related issues

Customs training activity

10. In response to an enquiry regarding the practicality of activities for customs officers prior to MEPS adoption and given the 24-month timeline of the project, UNEP and the Secretariat agreed that a south-south cooperation study-tour would be more appropriate to gain practical insights into the roles and responsibilities of different institutions involved in implementing and enforcing MEPS. UNEP further indicated that a comprehensive report would be prepared to document regional best practices and identify

key success factors relevant to the Comoros' context. The report will include recommendations for the development of a national legal and regulatory framework, energy-labelling system, compliance and enforcement mechanisms, testing and verification requirements, customs controls, market surveillance measures, and stakeholder awareness programmes. Findings and recommendations will be presented and validated through a national stakeholder workshop and agreed recommendations will be incorporated into the national MEPS and energy-labelling roadmap to support the design and implementation of an effective and sustainable framework in the Comoros. Accordingly, UNEP and the Secretariat agreed to revise the budget from US $22,000 for the customs' activity to US $12,000 for the study tour.

Minimum energy performance standards

11. The Secretariat requested information on the readiness of the country to adopt the regional SADC MEPS and energy labels for air conditioners and household refrigerators, which were approved in November 2023 and came into force in February 2024. UNEP responded that the Comoros wanted to adopt regional MEPS under the national MEPS and committed to a national adoption of the regional SADC MEPS by 31 December 2028.

Market assessment of refrigeration and air-conditioning equipment, imports, growth, brands and models

12. UNEP provided clarification on the coordination needs as well as the original country assessment of energy-efficient refrigerant-based cooling activity. It was agreed that the country assessment activity would be revised to focus on market assessment, and that the findings would be used to help identify opportunities for energy savings, support the development of evidence-based policies and standards, and support the adoption of national MEPS and other initiatives targeted towards promoting sustainable growth of more energy-efficient RAC technologies with low GWP. The proposed market assessment will incorporate, to the extent feasible, a low-GWP refrigerant component by evaluating current refrigerant use, assessing the availability and uptake of low-GWP alternatives, and identifying priority sectors. Considering the revision to the customs activity, UNEP and the Secretariat agreed to revise the budget for the market assessment of RAC equipment from US $10,000 to US $12,000 to ensure a robust survey and analysis of the market data.

Pilot refrigeration and air-conditioning product database

13. The Secretariat enquired about the practical elements of the implementation of the RAC product database. UNEP clarified that the database was expected to be hosted by the Department of Energy, responsible for energy-efficiency matters, noting that the national ozone unit (NOU) needed to strengthen its collaboration with the Department to ensure effective coordination. The arrangements for long-term maintenance and management of the database remain to be discussed and agreed upon. Close coordination will also be required with the Department of Commerce, licensing authorities, customs agencies and the NOU to facilitate regular data sharing and ensure that the database is comprehensive and up to date. UNEP and the Secretariat agreed to revise the budget from US $45,000 to US $53,000 to enhance database design and to add validation workshops during the pilot's implementation.

Gender policy implementation

14. Through the implementation of the project, the Government of the Comoros will seek to achieve equal representation and participation in workshops for men and women, and it will collect and report on disaggregated data. Activities will be implemented in alignment with the action plan developed under stage II of the HPMP, which addresses women's empowerment through the collection and monitoring of sex-disaggregated data; in particular, under the evaluation and reporting tasks.

Updated Agreement

15. In view of the inclusion of funding for additional activities to maintain energy efficiency in the refrigeration servicing sector and the accordingly revised funding schedule, the Agreement between the Government of the Comoros and the Executive Committee for stage II of the HPMP has been updated. Specifically, Appendix 2-A has been revised, and paragraph 17 has been added to indicate that the updated Agreement supersedes that reached at the 94th meeting by decision 94/27, as contained in annex I to the present document. The updated Agreement will be appended to the final report of the 99th meeting.

Conclusion

16. The project has been submitted in accordance with decisions 89/6(b) and 92/22 and is expected to help the Comoros adopt regional MEPS under the national MEPS and to establish formal coordination of RAC energy efficiency. It is expected that the Comoros will complete the national adoption of SADC regional MEPS by 31 December 2028. The project will also support coordinated efforts to advance energy-efficiency goals in the RAC sector, build the groundwork to support future MEPS and labelling programmes for RAC equipment, and pilot a product registration database to check for energy efficiency in imported appliances. The project will contribute to the overall objectives of the HPMP and help the country sustain the achieved reductions of HCFC consumption while adopting more energy-efficient technologies.

RECOMMENDATION

17. The Fund Secretariat recommends blanket approval of the project for additional activities to maintain energy efficiency in the refrigeration and air-conditioning servicing sector in the Comoros, and the corresponding 2027–2028 implementation plan, at the funding level shown in the table below, on the understanding that the Fund Secretariat has updated the Agreement between the Government of the Comoros and the Executive Committee for stage II of the HCFC phase-out management plan, as contained in annex I to the present document, specifically Appendix 2-A, to reflect the revised funding level owing to the inclusion of funding for additional activities to maintain energy efficiency in the refrigeration servicing sector, and paragraph 17, which has been added to indicate that the updated Agreement supersedes that reached at the 94th meeting by decision 94/27.

	Project title	Project funding (US $)	Support costs (US $)	Implementing agency
(a)	Additional activities for the introduction of alternatives to HCFCs with low global-warming potential and for maintaining energy efficiency in the refrigeration servicing sector	100,000	12,854	UNEP

PROJECT EVALUATION SHEET – MULTI-YEAR PROJECTS

The Comoros

PROJECT TITLE	AGENCY
Kigali HFC implementation plan (stage I)	UNEP (lead), UNIDO

ARTICLE 7 DATA (Annex F)	Year: 2025	6.69 mt	12,734 CO_2-eq tonnes

COUNTRY PROGRAMME SECTORAL DATA (CO_2-eq tonnes) AND ACTIVITIES								Year: 2025	
	Aerosol	Foam	Fire-fighting	Air-conditioning (AC) and refrigeration				Solvent	Other
				Manufacturing			Servicing		
				Refrigeration	AC	Other			
HFCs							12,734		
Planned activities agreed (Y/N)	N	N	N	N	N	N	Y	N	N

AVERAGE 2020–2022 HFC CONSUMPTION IN SERVICING	13.36 mt	32,040 CO_2-eq tonnes

BASELINE DATA (CO_2-eq tonnes)	2020	2021	2022	Average 2020–2022
HFC annual consumption	35,941	40,697	19,482	32,040
HCFC baseline (65%)				2,918
HFC baseline				34,958

HFC CONSUMPTION ELIGIBLE FOR FUNDING (CO_2-eq tonnes)	
Starting point for sustained aggregate reductions	n/a
Previously approved HFC phase-down investment projects	No
Aggregate reductions from previously approved projects	n/a

PROJECT DATA AS AGREED			2026*	2027	2028	2029	2030	Total
Consumption (CO_2-eq tonnes)	Montreal Protocol limits		34,958	34,958	34,958	31,462	31,462	n/a
	Maximum allowable		34,958	34,958	31,462	28,836	26,209	n/a
	Reduction from baseline (%)		0.0	0.0	10.0	17.5	25.0	n/a
Project costs requested in principle (US $)	UNEP	Project costs	55,850	0	28,150	0	0	84,000
		Support costs	7,260	0	3,660	0	0	10,920
	UNIDO	Project costs	32,000	0	46,000	0	0	78,000
		Support costs	4,160	0	5,980	0	0	10,140
Total amounts recommended in principle (US $)		Project costs	87,850	0	74,150	0	0	162,000
		Support costs	11,420	0	9,640	0	0	21,060
		Total funds	99,270	0	83,790	0	0	183,060

* Recommended for approval at the present meeting

Reduction from remaining consumption eligible for funding in stage I (CO_2-eq tonnes)	n/a

Secretariat's recommendation	Individual consideration

PROJECT DESCRIPTION

18. The present document contains the following sections:

I. Summary of the proposal as submitted

II. Background: Status of implementation of the HCFC phase-out management plan and previous HFC-related activities

III. HFC consumption overview: HFC consumption levels, trends, and consumption by sector

IV. Stage I of the Kigali HFC implementation plan, as submitted: Regulatory framework, phase-down strategy, total stage cost, and implementation plan for the first tranche

V. Secretariat's comments, including the agreed cost of activities

VI. Recommendation

I. Summary of the proposal as submitted

19. On behalf of the Government of the Comoros, UNEP as the lead implementing agency has submitted a request for stage I of the Kigali HFC implementation plan (KIP), at a total cost of US $183,060, consisting of US $87,500, plus agency support costs of US $11,375, for UNEP and US $74,500, plus agency support costs of US $9,685, for UNIDO, as originally submitted.[5]

20. The implementation of stage I of the KIP will assist the Government of the Comoros in achieving a 17.5 per cent reduction from its HFC baseline consumption, or 10 per cent below the average HFC consumption in the baseline years 2020–2022 by 1 January 2029, an in maintaining it until 2030.

21. The first tranche of stage I of the KIP requested at this meeting, as originally submitted, amounts to US $60,250, plus agency support costs of US $7,832 for the period of January 2027 to September 2028, for UNEP only.

II. Background

Status of implementation of the HCFC phase-out management plan

22. Table 3 presents information on the HCFC phase-out management plan (HPMP) in the Comoros as of August 2026.

Table 3. HPMP implementation status for the Comoros

Particulars	Stage I	Stage II
Meetings when HPMP was approved or updated	64th	94th
Reduction from baseline	35% by 2020	100% by 2030
Total stage cost (US $)	160,000	427,500
Date of completion (actual or planned)	1 December 2022	31 December 2031

Status of implementation of previous HFC-related activities

23. Table 4 presents an overview of activities implemented in the Comoros in the context of the Kigali Amendment that have been funded by the Multilateral Fund.

[5] As per the letter of 17 August 2026 from the Ministry of Production, Environment, Energy, Industry and Handicrafts of the Comoros to the Secretariat.

Table 4. Previously approved HFC-related activities in the Comoros

Approval meeting	Project title	Implementing agency	Cost (US $)	Date of completion
74th	Survey of ODS alternatives	UNEP	40,000	August 2017
81st	Enabling activities for HFC phase-down	UNEP	50,000	December 2022

III. HFC consumption overview

HFC consumption levels

24. The Comoros only imports (does not produce) HFCs for use in the refrigeration and air-conditioning (RAC) servicing sector. The substances consumed in 2025 were: HFC-134a (42.5 per cent of total HFC consumption in CO_2-equivalent (CO_2-eq) tonnes), R-410A (32.0 per cent), R-404A (23.3 per cent), R-407C (1.8 per cent) and HFC-32 (0.4 per cent). Table 5 presents the country's HFC consumption as reported to the Ozone Secretariat under Article 7 of the Montreal Protocol, and the country's HFC baseline.

Table 5. 2020–2025 HFC consumption and baseline for the Comoros (Article 7 data)

HFC	GWP	2020	2021	2022	2023	2024	2025
Metric tonnes (mt)							
HFC-32	675	0.0	0.0	0.0	0.0	0.0	0.07
HFC-134a	1,430	4.50	5.20	3.20	3.40	3.66	3.78
R-404A	3,921.6	4.90	5.40	2.30	2.45	2.78	0.76
R-407C	1,773.85	2.40	3.40	1.20	1.35	0.30	0.13
R-410A	2,087.5	2.89	2.90	1.80	1.60	1.70	1.95
Total (mt)		**14.69**	**16.90**	**8.50**	**8.80**	**8.44**	**6.69**
CO_2-eq tonnes							
HFC-32	675	0	0	0	0	0	47
HFC-134a	1,430	6,435	7,436	4,576	4,862	5,234	5,405
R-404A	3,921.6	19,216	21,177	9,020	9,608	10,902	2,980
R-407C	1,773.85	4,257	6,031	2,129	2,395	532	231
R-410A	2,087.5	6,033	6,054	3,758	3,340	3,549	4,071
Total (CO_2-eq tonnes)		**35,941**	**40,697**	**19,482**	**20,205**	**20,217**	**12,734**
HFC baseline calculation (CO_2-eq tonnes)							
Average HFC consumption in 2020–2022							32,040
HCFC baseline (65%)							2,918
HFC baseline							34,958

Country programme implementation report

25. The sectoral HFC consumption data provided by the Government of the Comoros in its country programme (CP) implementation report for 2025 is consistent with the data reported under Article 7 of the Montreal Protocol.

HFC consumption trends

26. HFC consumption increased from 2020 and peaked in 2021. In 2022, it fell to nearly half the 2021 level and remained broadly stable over the following two years. In 2025, R-404A consumption declined by 75 per cent relative to levels recorded over the previous three years, owing to logistical constraints and import disruptions. Because R-404A has a high global-warming potential (GWP), this decline drove a substantial reduction in total HFC consumption, particularly when expressed in

CO_2-eq tonnes. However, this decline in consumption of R-404A was due to external causes and does not represent regular markets needs for commercial refrigeration, which are not decreasing.

27. Consumption of R-407C had also declined over 2024 and 2025, while consumption of HFC-134a and R-410A has increased slightly from 2022 onward, and HFC-32 was first consumed in 2025.

HFC consumption by sector

28. HFCs are mainly consumed for servicing in the commercial refrigeration sector (30.21 per cent in metric tonnes (mt) and 46.63 per cent in CO_2-eq tonnes), followed by residential air-conditioning (AC) (27.49 per cent in mt and 22.45 per cent in CO_2-eq tonnes), mobile air-conditioning (MAC) (22.04 per cent in mt and 13.16 per cent in CO_2-eq tonnes), domestic refrigeration (14.81 per cent in mt and 8.84 per cent in CO_2-eq tonnes) and other subsectors. Tables 6 and 7 show HFC use by sector based on 2024 data, noting that the extraordinary decrease of R-404A imports in 2025 was not representative of market needs.

Table 6. 2024 HFC consumption in RAC servicing subsectors in the Comoros (mt)

Sector	HFC-32	HFC-134a	HFC-404A	R-407C	R-410A	Total	Share of total (%)
Refrigeration subsectors							
Domestic		1.25				**1.25**	14.81
Commercial:							
Stand-alone units		0.12	0.90			**1.02**	12.09
Condensing units		0.11	1.42			**1.53**	18.13
Transport			0.46			**0.46**	5.45
Air-conditioning subsectors							
Residential		0.32		0.30	1.70	**2.32**	27.49
Mobile		1.86				**1.86**	22.04
Total		**3.66**	**2.78**	**0.30**	**1.70**	**8.44**	**100**

Table 7. 2024 HFC consumption in RAC servicing subsectors in the Comoros (CO_2-eq tonnes)

Sector	HFC-32	HFC-134a	HFC-404A	R-407C	R-410A	Total	Share of total (%)
Refrigeration subsectors							
Domestic		1,788				**1,788**	8.84
Commercial:							
Stand-alone units		172	3,529			**3,701**	18.31
Condensing units		157	5,569			**5,726**	28.32
Transport			1,804			**1,804**	8.92
Air-conditioning subsectors							
Residential		458		532	3,549	**4,539**	22.45
Mobile		2,660				**2,660**	13.16
Total		5,234	10,902	532	3,549	**20,217**	**100**

Refrigeration and air-conditioning servicing sector

29. There are close to 700 technicians (only three of them women) and 115 workshops consuming HFCs in the Comoros, with an estimated 68 per cent of technicians employed in the informal sector. Within the framework of the HPMP, a large portion of the country's technicians, both formal and informal, either have received or will receive training, including on good refrigeration servicing practices, refrigerant recovery and recycling, leak detection, and the safe handling of flammable refrigerants with low GWP. Selected instructors and experts have also been trained in regional programmes organised by UNEP, and the country is in the process of establishing a technicians' certification scheme under stage II of the HPMP.

30. Technicians' training is offered by the National School of Technical and Vocational Training, vocational and technical secondary schools, the National Institute for Professional Training, and the Institute of Technology at the University of Comoros. The latter was set to introduce an undergraduate course in RAC in the 2026–2027 academic year. The National Refrigeration Association assists with the selection of technicians for training, validation of training programmes, and formalization of technicians identified in the informal sector.

31. There is no RAC equipment manufacturing capacity in the country; refrigerant consumption occurs during the installation and servicing of a wide variety of imported equipment, including second-hand appliances. The installed stock comprises a wide range of brands, models, refrigerants, and energy-performance levels.

Domestic, commercial and transport refrigeration servicing

32. There is an estimated pool of 52,000 domestic refrigerators, including chest freezers, using HFC-134a in the country. Domestic refrigerators based on R-600a are gaining popularity due to its applicability in solar-based units. The sector is experiencing a trend of replacing HFC-134a with R-600a in HFC-based equipment by untrained technicians.

33. Commercial refrigeration is the largest HFC-consuming sector in the country, with HFC-134a and R-404A being used in 1,284 stand-alone appliances including refrigerated display cabinets and freezers installed in businesses, hotels and restaurants, and 520 condensing units for cold rooms and ice machines used in the fisheries sector.

34. The fisheries sector, comprising an estimated 12,000 fishers,[6] is a major productive sector and HFC consumer that supplies the local market. The coastal fleet includes about 2,200 non-motorised vessels, 42 motorised vessels with insulated ice chambers, and one vessel with mechanical cooling. Fish are transported mainly on ice, with only 15 refrigerated trucks available across the country. Most of the estimated 190 fishmongers have a 50–100 m^3 cold room, an ice machine with an average capacity of 2 tonnes, and a 4 m^3 ice-storage silo. Fish markets and retailers also use ice beds and refrigerated display units. Refrigerant leakage remains high, partly because of intermittent electricity supply, and many cold rooms require repairs. Foreign enterprises, mainly from the European Union, also fish commercially in the Comoros' Exclusive Economic Zone (under license) and ship their catch directly to home countries without transiting through the Comoros.

35. Between 2012 and 2021, the Southwest Indian Ocean Fisheries Governance and Shared Growth Programme provided financial and technical assistance to the fisheries sector in several countries, including the Comoros, to improving the fisheries value chain to reduce post-harvest losses, and for fisheries governance. This included RAC equipment provided as part of fisheries infrastructure and value-chain investments rather than as support to the RAC servicing industry.

Residential and commercial air-conditioning servicing

36. The AC equipment used in the Comoros is limited to small split-type residential units. This subsector is the second largest HFC consumer in the country. An estimated 20,600 air conditioners are installed in hotels, offices, commercial establishments, banks, health facilities, government buildings and higher-income households. The main refrigerants used are R-410A and R-407C, the more recently introduced HFC-32, and HCFC-22 in older equipment.

[6] The fisheries sector employes directly or indirectly around 45,000 people, or about 5 per cent of country's population.

Mobile air-conditioning servicing

37. There are only eight specialized MAC workshops in the country, with 25 technicians working in the sector. The main refrigerant used in MAC servicing is HFC-134a (1.86 mt). High leakage rates (reported at 20 per cent) are attributed to the lack of good servicing practices and the importation of used vehicles. Imports of HFO-1234yf have been identified, but the extent of its use in this sector has not been assessed.

IV. Stage I of the Kigali HFC implementation plan as submitted

Institutional, policy and regulatory framework

38. The Ministry of the Environment in charge of Tourism is responsible for the implementation of the Montreal Protocol in the Comoros, together with the General Directorate of Customs and Indirect Duties (GDCID), which registers and controls the import and export of ODSs through the licensing system and provides import statistics on which quota allocation is based. The national ozone unit (NOU), established within the General Directorate of the Environment and Forestry, allocates quotas, operates the import licensing and quota system, supervises Multilateral Fund projects, and collects and reports the Article 7 consumption data. The Inter-ministerial Ozone Committee (IMOC), composed of representatives of public institutions, the private sector and civil society, reviews quota applications submitted by importers, determines the quantities to be imported and the list of approved importers, and provides technical advice and support to the NOU.

39. The licensing system for HFCs has been in operation since 2021 and the HFC quota system became operational in 2024. The Comoros does not currently have national codes of practice or standards governing the safe introduction of flammable and toxic refrigerants, nor national energy-performance standards for RAC or other electrical and electronic equipment. As a member of the Southern African Development Community (SADC), the Comoros is primed to adopt by 2028 two harmonised regional minimum energy performance standards (MEPS): SADC HT 110:2023 for non-ducted single-split, self-contained and portable air conditioners and air-to-air reversible heat pumps with a rated cooling capacity at or below 16 kW, and SADC HT 111:2023 for vapour-compression refrigerating appliances of between 10 and 1,500 litres.

Phase-down strategy for stage I of the Kigali HFC implementation plan

Overarching strategy

40. The Comoros proposes to reduce its HFC consumption to 28,836 CO_2-eq tonnes by 2029 and to sustain this reduction in 2030. This is 10 per cent below the average HFC consumption of the baseline years (2020–2022) and 17.5 per cent below the baseline.

41. Stage I of the KIP will focus on strengthening the HFC quota system, building capacity of customs and enforcement officers on the control of HFCs, and undertaking complementary work on servicing sector areas that were not sufficiently covered by HPMP activities, such as technician training in the MAC and domestic refrigeration sectors, reducing the consumption of R-404A and HFC-134a through demonstration projects in the fisheries sector, and strengthening the refrigerant recovery and recycling activities.

Proposed reductions

42. UNEP included in the KIP request a business-as-usual (BAU) forecast scenario, departing from an estimated consumption of 21,968 CO_2-eq tonnes in 2026 and assuming an average annual growth rate of 3.4 per cent from 2024 on, noting that the 2025 reduction in consumption was due to external factors. The

estimation also added a small portion of CO_2-eq tonnes corresponding to HFCs phased in resulting from HCFC phase-out.[7]

43. During the project review, the BAU forecast scenario was updated to depart from an estimated annual consumption of 23,446 CO_2-eq tonnes in 2026, based on actual imports of R-404A as of 31 August 2026,[8] obtained from the customs department. The average growth rate was maintained at 3.4 per cent and the factor corresponding to HFCs phased in as a result of HCFC phase-out was reduced.[9] The updated BAU forecast scenario is presented in table 8.

Table 8. HFC consumption forecast under the unconstrained scenario, Montreal Protocol limits, and proposed HFC reductions under stage I of the KIP for the Comoros (CO_2-eq tonnes)

	2026	2027	2028	2029	2030
Consumption forecast at an annual growth rate of 3.4 %*	23,446	24,443	25,398	26,519	27,392
Montreal Protocol HFC consumption limits	34,958	34,958	34,958	31,462	31,462
HFC consumption levels proposed under the KIP	34,958	34,958	34,958	28,836	28,836
Proposed reductions from the baseline (%)	0.0	0.0	0.0	17.5	17.5

*Based on recent economic growth figures. Annual figures also include up to 872 CO_2-eq tonnes corresponding to HFC phase-in resulting from HCFC phase-out.

Proposed activities

44. Activities proposed for implementation in the servicing sector under stage I and in the first tranche and their cost breakdown are presented in table 9.

Table 9. Servicing sector activities and their costs in stage I and in the first tranche of stage I of the KIP for the Comoros, as submitted

Activity	Agency	Cost (US $)	
		Stage I	First tranche
Regulatory component			
Strengthening of the licensing and quota system: Strengthening of the quota allocation methodology, including consultation and information workshops for stakeholders, and study on the electronic licensing systems to strengthen HFC control and improve data quality	UNEP	10,000	10,000
Capacity building for customs and enforcement officers: Updating the customs training curriculum to include issues of refrigerant flammability and safe handling as well as MAC sector considerations, and training of 50 customs and enforcement officers, including 10 women, on HFC control measures	UNEP	18,500	10,250
Servicing sector capacity-building			
Training of MAC technicians: Adapting the training curriculum for the MAC sector and training of 25 technicians on refrigerant recovery, leakage detection and prevention, proper servicing practices and the safe handling of A2L refrigerants	UNEP	10,250	6,250
Training of informal technicians: Identifying informal non-RAC technicians, such as plumbers or electricians, who also carry out the servicing of domestic refrigerators; developing a simplified curriculum to familiarize those	UNEP	16,500	8,250

[7] The factor was estimated assuming that the 0.36 mt of HCFC-22 still consumed in the country would be converted to R-404A. This factor grows gradually each year to reach 1,412 CO_2-eq tonnes in both 2029 and 2030.

[8] As of 31 August 2026, 2.29 mt (8,988 CO_2-eq tonnes) of R-404A had been imported, with expected imports of 3.34 mt (13,482 CO_2-eq tonnes) for the entire year. Imports of other substances were maintained at the 2025 levels without any growth.

[9] The factor was reduced from the maximum of initially estimated 1,412 to 872 CO_2-eq tonnes, noting that HCFC-22 will also be replaced by HFC-134a, R-410A and HFC-32 (not only R-404A) based on current applications.

Activity	Agency	Cost (US $)	
		Stage I	First tranche
technicians with issues specific to RAC servicing, including safety; and training 50 of those technicians (including the 3 identified women technicians) to encourage their formalization and RAC association membership			
Extension of the certification scheme to MAC and domestic refrigeration technicians: Supporting the introduction of the technician certification scheme currently implemented under the HPMP and extending it to MAC and domestic refrigeration technicians	UNEP	7,250	7,250
Provision of refrigerant recovery units to the MAC sector: Procurement and delivery of 8 recovery machines with filters and 16 cylinders to 8 MAC servicing workshops	UNIDO	10,000	0
Support for recovery and recycling: Provision of tool kits and equipment[10] for refrigerant recovery and leak detection to eight RAC workshops (US $10,000)	UNEP	10,000	10,000
and of procurement of two refrigerant identifiers to support recovery and recycling (US $12,000)	UNIDO	12,000	0
Technical support for the fisheries sector			
Sector mapping: Study to determine the precise number, location and condition of refrigeration units in the sector and the refrigerants they use, and to identify candidates for demonstration projects	UNEP	1,500	1,500
Demonstration of the use of ammonia (R-717) in ice production and training of operators on the safe maintenance of flake ice machines: Replacement of an R-404A-based machine of 3-5 tonne capacity with an R-717-based flake ice machine at one fishmonger, including technical support and operator training	UNIDO	30,000	0
Demonstration of propane (R-290)-based, high-efficiency monobloc units for chilled and frozen fish storage: Replacement of two HFC-based refrigeration systems by one 3 kW monobloc unit for a 0 °C cold room and one 6 kW monobloc unit for a −20 °C cold room, including technical support and operator training at two fishmongers	UNIDO	21,000	0
Monitoring and dissemination of results: Monitoring of energy and refrigerant consumption for 6 months prior to the installation of new units and comparison of data after the installation to determine energy savings and leak reductions; and dissemination of results to the fisheries and other stakeholders, including owners, operators, servicing technicians and the RAC association	UNIDO	1,500	0
Project management and monitoring	UNEP	13,500	6,750
Subtotal for UNEP		87,500	60,250
Subtotal for UNIDO		74,500	0
Total		**162,000**	**60,250**

Project implementation, coordination and monitoring

45. The NOU is responsible for harmonizing the implementation of both the HPMP and the KIP and while avoiding the duplication of effort and cost. The NOU is staffed by a permanent national team and may be punctually supported by national experts as required. UNEP has requested US $13,500 for project coordination and monitoring, comprising US $6,500 for consultants, US $5,000 for coordination- and monitoring-related travel, and US $2,000 for other expenses.

[10] Including recovery units, cylinders, scales, valve removal tools, inspection mirrors, flares, pipe wrenches, tube cutters, electronic thermometers, ratchet spanners and bending springs.

Total cost of stage I of the Kigali HFC implementation plan

46. The budget for stage I of the KIP has been proposed in line with decision 92/37 at US $162,000, as summarized in table 9 above. This value corresponds to U$ 135,000 eligible for countries with average HFC consumption in servicing in baseline year below 15 mt, plus 20 per cent for committing to achieve a 10 per cent reduction from the average HFC consumption in the baseline years.

Implementation plan for the first tranche

47. The first funding tranche of stage I of the KIP was submitted in the total amount of US $60,250, as shown in table 9 above, to be implemented between January 2027 and September 2028. Detailed information on the activities to be implemented under the first tranche, including adjustments and level of funds as agreed, are presented in table 10 below.

SECRETARIAT'S COMMENTS AND RECOMMENDATION

V. Comments

Overarching strategy

Stage duration

48. Upon request, UNEP explained that extending stage I to 2030 was intended to allow enough time for implementation in alignment with stage II of the HPMP, which also runs until 2030, so that the complementary regulatory measures, customs and technician training, certification schemes and refrigerant-management activities under the two plans could be coordinated and implemented without duplication.

HFC consumption in baseline years, consumption trends and proposed targets

49. While welcoming the Government's proposed 2029 HFC consumption target of a 17.5 per cent reduction from the baseline, which exceeds the 10 per cent reduction required under the Montreal Protocol, the Secretariat asked whether the Government would consider an even higher reduction target by the end of stage I of the KIP, noting that HFC consumption appeared to be in decline since 2021.

50. UNEP explained that consumption reported in 2020 and 2021 was consistent with the 2019 level of 13.78 mt. The decline in imports in 2022 was influenced by the entry into force of the HFC control framework, including the licensing system, and the incorporation of national customs codes for individual HFCs into the customs tariff under the 2022 Harmonized System (HS) update. HFC consumption remained stable in 2023 and 2024.

51. The sharp decline in R-404A imports in 2025 was exceptional and resulted from several factors. Fuel-supply difficulties caused electricity shortages that disrupted the operation of R-404A-based cold-storage facilities. Comparable reductions were not observed for HFC-134a or R-410A, partly because of the greater use of solar systems in the domestic sector. The country is also vulnerable to disruptions in international shipping routes and schedules, as direct connections are limited and most imports are transhipped through Dubai. Regional tensions and instability have further disrupted shipping and raised freight, insurance and fuel costs. Given the country's small market and limited number of R-404A importers, modest changes in import volumes can significantly affect annual totals.

52. UNEP reassured the Secretariat that the factors affecting R-404A imports in 2025 had been resolved, with the official 2026 customs data provided by the Government showing that, as of August 2026,

2.29 mt of R-404A had been imported, i.e., thrice the quantity imported in 2025. By the end of 2026, R-404A imports are expected to exceed the 2.45 mt and 2.78 mt recorded in 2023 and 2024, respectively.

53. In view of substantial fluctuations in HFC consumption, the Secretariat analysed data from the years 2019–2025 to better assess market size. The average annual consumption over that period was 26,204 CO_2-eq tonnes,[11] i.e., below average HFC consumption in baseline years (32,040 CO_2-eq tonnes). Accordingly, the Secretariat and UNEP discussed using 29,122 CO_2-eq tonnes as the reference level for reductions, comprising the average HFC consumption of 26,204 CO_2-eq tonnes plus the HCFC component of the baseline of 2,918 CO_2-eq tonnes. This reference was considered more representative of the country's market needs than the HFC baseline-year average alone. It was consequently agreed to apply a 10 per cent reduction to that reference level, equivalent to a 25 per cent reduction from the established baseline by 2030. An intermediate reduction of 10 per cent of the HFC baseline was also agreed for 2028, while the intermediate reduction of 17.5 per cent in 2029 was maintained as submitted.

54. The Secretariat considers that this schedule demonstrates the Government of the Comoros' strong commitment to phasing down HFCs. Given the relatively small HCFC component of the country's baseline (8.3 per cent) and the disproportionate effect that individual shipments can have on overall consumption in a small market, the Secretariat considers that more stringent reduction targets would not be advisable, as they could increase the risk of non-conformity with the Agreement.

Institutional, policy and regulatory framework

HFC licensing and quota system

55. In line with decision 87/50(g), UNEP confirmed that the Comoros had an established and enforceable system of licensing and quotas for monitoring HFC imports/exports in place. Licences are issued to registered importers by consignment against the established annual quota, on a first-come, first-served basis. Applications are submitted to the NOU, examined by the IMOC based on the customs' statistics, and the approved quantities are issued by the GDCID. Imports are recorded using the World Customs Organization HS codes; under the enabling activities project, national customs codes were created for individual HFCs and incorporated into the customs tariffs, so that HFC imports can be monitored and reported separately. The established annual quotas for 2026 and 2027 have been set at the baseline level of 34,958 CO_2-eq tonnes.

Technical and cost-related issues

Regulatory measures

56. Noting that R-600a-based domestic refrigerators were already available on the market, the Secretariat asked whether the Government of the Comoros had considered banning imports of HFC-based domestic refrigerators during stage I of the KIP. UNEP explained that, during stage I, the Government intended to strengthen controls on HFC-based equipment in parallel with the implementation of the licensing and quota system and the development of standards for alternative refrigerants. As part of this regulatory work, the Government will assess the feasibility and timing of import restrictions on equipment categories for which low-GWP alternatives are already commercially available, including domestic and stand-alone commercial refrigeration equipment, with a view to setting a specific implementation date during stage II of the KIP. In the meantime, the adoption of the SADC HT 111:2023 (MEPS for refrigerators) expected during stage I could help curb the imports of inefficient refrigerators by establishing minimum energy performance requirements and low-GWP refrigerant criteria for domestic refrigerators.

[11] Excluding the outlier years (2021, when consumption peaked, and 2025, when it fell sharply) produced a close average of 25,999 CO_2-eq tonnes.

While the standard does not explicitly ban used equipment, if properly enforced, it could act as a barrier to the imports of inefficient older refrigerators, including many HFC-based models.

Training and equipment for the servicing sector

57. Regarding the training and formalization of technicians, UNEP explained that 459 technicians (68 per cent of the national total) operated outside the registered workshops and were therefore considered informal. The proposed activities aim to support their transition to formal practice. Familiarization training will provide an initial qualification and facilitate access to the National Refrigeration Association. Registration and proof of training will be required to receive tool kits and recovery equipment distributed under the KIP and HPMP and, once the certification scheme is operational, to purchase refrigerants. The KIP will initially train 50 informal domestic refrigeration technicians on practical servicing, refrigerant handling and safety, and provide a pathway to certification under stage II of the HPMP. The activity is expected to be expanded during stage II of the KIP.

Demonstration projects at end users

58. Regarding the demonstration of ammonia (R-717) in ice production, UNIDO explained that the project would replace one R-404A condensing unit, with a refrigerant charge of 12–25 kg, a 3-5 tonne/day ice production capacity and an energy consumption between 300 to 500 kWh/day. The project was initially estimated at US $40,000. Of this amount, US $30,000 was requested from the Multilateral Fund (US $21,000 for equipment, US $4,000 for procurement-related logistics, freight and insurance, and US $5,000 for installation support and operator training), while the end user would contribute an estimated US $10,000 for the removal and disposal of the baseline unit and installation of the replacement unit. Following the cost review, the Fund's contribution of US $30,000 was maintained; however, it was agreed that the end user would cover the US $4,000 in logistics costs. The corresponding amount under the Fund would instead cover monitoring of the performance, servicing requirements and energy consumption of both the baseline and replacement equipment.

59. Regarding the demonstration of the two monobloc systems, upon review it was agreed that the Multilateral Fund would only cover the demonstration of the larger unit (6 kW cooling capacity). Accordingly, the US $21,000 initially requested from the Multilateral Fund was adjusted to US $13,000, including US $10,000 for equipment and US $3,000 for the monitoring of performance, servicing requirements and energy consumption of both baseline and replacement equipment. The end user's contribution consists of the removal and disposal of baseline equipment and installation of the replacement unit, estimated at US $4,000–5,000, as well as any civil work required and other ancillaries, to be determined based on the specifics of the location. The funds initially allocated for the second monobloc were reallocated to other activities, as explained in the next section.

60. For both demonstration projects, UNIDO will monitor system performance, including the energy efficiency of both baseline and replacement equipment, over six months each, and share results with other end users, technicians and the RAC association. In line with decision 92/36(g), upon completion of the two demonstration projects at end users included in the KIP, UNIDO will submit a final report on their implementation, including the HFC phase-out and energy-efficiency gains achieved.

Funds reallocation and tranche distribution

61. The US $8,000 reduced from the monobloc project were allocated to strengthen the following activities: strengthening of the quota system (US $600), training of an additional five MAC technicians (US $1,650), extension of the certification to MAC and domestic refrigeration technicians (US $2,750); mapping of the fisheries sector (US $1,500); and dissemination of results of the demonstration projects (US $1,500).

62. Upon discussion of proposed activities, UNEP agreed to adjust tranche distribution, moving forward to the first tranche the distribution of equipment required to strengthen imports control, support training activities, and start refrigerant emission reductions as soon as possible. This equipment includes two gas identifiers agreed to be distributed to customs entry points (US $12,000), refrigerant recovery units for MAC workshops (US $10,000) and equipment to support the refrigerant recovery programme (US $10,000). Accordingly, the first tranche was agreed at US $87,850, which corresponds to 54 per cent of the stage value, in line with existing policies. It was also agreed that procurement of the refrigerant recovery units would be undertaken by UNIDO instead of UNEP.

Total project cost and plan of action for the first tranche of the Kigali HFC implementation plan

63. At a total cost of US $162,000, stage I of the KIP for the Comoros will result in a reduction of 8,749 CO_2-eq tonnes from the country's HFC baseline. The revised cost of activities to be implemented during stage I and the agreed plan of action for the first tranche are summarized in table 10.

Table 10. Agreed cost of activities to be implemented during stage I of the KIP in the Comoros and plan of action under the first tranche

Activity and plan of action under the first tranche	Agency	Agreed cost (US $)	
		Stage I	First tranche
Regulatory component			
Strengthening of the licensing and quota system: Assessment of the HFC quota allocation strategy; completion of a study on the introduction of an electronic licensing system; and organization of 3 consultation and awareness workshops for HFC importers and distributors	UNEP	10,600	10,600
Capacity building for customs and enforcement officers: Updating the customs training curriculum to include HFCs, refrigerant flammability, safe handling and MAC sector considerations; training of 25 customs and enforcement officers, including 5 women, on HFC control measures; and provision of refrigerant identifiers to 2 customs entry points	UNEP	18,500	10,250
	UNIDO	12,000	12,000
Servicing sector capacity building			
Training of MAC technicians: Adapting the MAC training curriculum to include refrigerant recovery, safe handling, and leak detection and prevention; and training of at least 15 (out of 30) technicians	UNEP	11,900	7,000
Training of informal technicians: Identification of informal RAC technicians operating in the domestic refrigeration servicing sector; development of a simplified curriculum to familiarize those technicians with issues specific to RAC servicing; and training of 17 technicians	UNEP	16,500	8,250
Certification scheme extension to MAC and domestic refrigeration technicians	UNEP	10,000	10,000
Provision of refrigerant recovery units to the MAC sector: Provision of 8 recovery units and 16 cylinders to 8 MAC servicing workshops	UNIDO	10,000	10,000
Support for recovery and recycling: Provision of tool kits and equipment for refrigerant recovery and leak detection to 8 RAC workshops	UNIDO	10,000	10,000
Technical support for the fisheries sector			
Sector mapping: Study to determine the number, location and condition of refrigeration units in the sector and the refrigerants they use, and to identify candidates for demonstration projects	UNEP	3,000	3,000
Demonstration of the use of R-717 in ice production, including monitoring (second tranche)	UNIDO	30,000	0
Demonstration of an R-290-based, high-efficiency monobloc unit for chilled and frozen fish storage, including monitoring (second tranche)	UNIDO	13,000	0
Monitoring and dissemination of results (second tranche)	UNIDO	3,000	0

Activity and plan of action under the first tranche	Agency	Agreed cost (US $)	
		Stage I	First tranche
Project management and monitoring: Consultants (US $3,250), coordination- and monitoring-related travel (US $2,500), and other expenses (US $1,000) (first tranche)	UNEP	13,500	6,750
Subtotal for UNEP		84,000	55,850
Subtotal for UNIDO		78,000	32,000
Total		**162,000**	**87,850**

Co-financing

64. The two projects demonstrating low-GWP technologies in the fisheries sector will be co-financed by the beneficiary end users, who will cover the removal and disposal of baseline equipment, the installation of replacement units, and any necessary civil works and ancillary requirements, to be determined according to site-specific conditions. In-kind co-financing will also be provided for selected activities, including premises and some operating expenses for training and refrigerant recovery. Relevant Government bodies will facilitate implementation and provide in-kind support for other activities, including the technicians' certification scheme. No activities financed outside the Multilateral Fund are known to duplicate the servicing-sector activities included in the KIP.

2026–2028 business plan of the Multilateral Fund

65. UNEP is requesting US $162,000, plus agency support costs, for the implementation of stage I of the KIP for the Comoros. The total value of US $162,000, including agency support costs, requested for the period of 2026–2028, is US $85,725 above the amount in the business plan.

Gender policy implementation

66. In line with decisions 84/92(d), 90/48(c) and 92/40(b), UNEP and UNIDO intend to apply the Multilateral Fund policy throughout the KIP implementation through encouraging the participation of women in technical training, certification, and employment related to the transition to low-GWP refrigerants and energy-efficient cooling technologies, targeted outreach to women, encouraging female enrolment in RAC programmes, inclusion of women in technicians' training, customs capacity-building activities and stakeholder consultations, and through monitoring participation. Improved access to technical careers can create new employment opportunities for women while helping address the shortage of qualified RAC technicians in the Comoros. The adoption of energy-efficient refrigeration technologies will indirectly benefit women engaged in fisheries by improving cold-chain performance, reducing post-harvest losses, and supporting higher-quality fish products, thereby strengthening livelihoods and enhancing food security in coastal communities.

Sustainability of the HFC phase-down and assessment of risks

67. At its 98th meeting, the Executive Committee noted that Government restructuring had delayed submission of the second tranche of stage II of the HPMP and urged the Government and UNEP to submit it to the 99th meeting. Following its non-submission, the Secretariat sought clarification on the continuing delay and its implications for initiating the KIP. UNEP reported that institutional and implementation constraints had been resolved, first-tranche activities were under way, and the second tranche request would be submitted to the 100th meeting. The NOU had resumed reporting and actively supported preparation of the KIP and the energy-efficiency project under decision 89/6 submitted to this meeting. UNEP therefore expected no restructuring-related delays in initiating either project.

68. Potential risks to the sustainability of KIP outcomes in the Comoros include limited institutional and financial capacity, weak implementation or enforcement of HFC licensing and quotas, market preference for lower-cost HFC-based equipment, inadequate refrigerant recovery and recycling infrastructure, and reliance on imported technologies. To mitigate these risks, the KIP prioritises institutional strengthening, permanent integration of RAC training into technical curricula, enforcement of import licensing and energy-efficiency standards, support for refrigerant recovery and recycling, and sustained stakeholder awareness. The planned technology demonstration projects will also encourage end users, importers and distributors to adopt alternative technologies.

Impact on the climate

69. The activities proposed, including efforts to promote low-GWP alternatives, refrigerant recovery and reuse and technician training, indicate that the implementation of stage I of the KIP will reduce refrigerant emissions in the atmosphere, resulting in climate benefits. A calculation of the impact on the climate of the activities in the KIP indicates that by 2030, the Comoros will have reduced HFC emissions by approximately 8,749 CO_2-eq tonnes, calculated as the difference between the HFC baseline for compliance and the 2030 target, assuming that all consumed HFCs would have eventually been emitted.

Draft Agreement

70. A draft Agreement between the Government of the Comoros and the Executive Committee for stage I of the KIP is contained in annex II to the present document.

Coordination of activities in the servicing sector under HCFC phase-out and HFC phase-down plans

71. In line with decision 92/37(b)(i)d., stage I of the KIP for the Comoros has been designed for harmonized implementation of stage II of the HPMP. The NOU will be responsible for the coordination and monitoring of both projects, and technicians will benefit from training related to both HCFC phase-out and HFC phase-down. The KIP extends the scope of activities to the MAC sector and the domestic refrigeration sector, including non-RAC technicians informally operating in the sector. Annex III summarizes the simultaneous implementation of activities under the HPMP and the KIP.

VI. Recommendation

72. The Executive Committee may wish to consider:

(a) Approving, in principle, stage I of the Kigali HFC implementation plan (KIP) for the Comoros for the period 2026–2030 to reduce HFC consumption by 10 per cent of the country's baseline by 2028, 17.5 per cent of the baseline (i.e., 10 per cent of average HFC consumption in the baseline years) by 2029 and 25 per cent of the baseline by 2030, in the amount of US $183,060, consisting of US $84,000, plus agency support costs of US $10,920, for UNEP and US $78,000, plus agency support costs of US $10,140, for UNIDO;

(b) Noting:

(i) The strong commitment of the Government of the Comoros to support reductions in HFC consumption in advance of the Montreal Protocol targets;

(ii) That, upon completion of the end-user projects included in stage I of the KIP, UNIDO will submit final reports on the implementation of these projects, including the HFC phase-out and energy-efficiency gains achieved, in line with decision 92/36(g);

(c) Approving:

(i) The draft Agreement between the Government of the Comoros and the Executive Committee for the reduction in consumption of HFCs in accordance with stage I of the KIP, contained in annex II to the present document; and

(ii) The first tranche of stage I of the KIP for the Comoros and the corresponding tranche implementation plan, in the amount of US $99,270, consisting of US $55,850 plus agency support costs of US $7,260, for UNEP and US $32,000, plus agency support costs of US $4,160, for UNIDO.

Annex I

TEXT TO BE INCLUDED IN THE UPDATED AGREEMENT BETWEEN THE GOVERNMENT OF THE COMOROS AND THE EXECUTIVE COMMITTEE OF THE MULTILATERAL FUND FOR THE REDUCTION IN CONSUMPTION OF HYDROCHLOROFLUOROCARBONS IN ACCORDANCE WITH STAGE II OF THE HCFC PHASE-OUT MANAGEMENT PLAN

17. **This updated Agreement supersedes the Agreement reached between the Government of the Comoros and the Executive Committee at the 94th meeting of the Executive Committee.**

APPENDIX 2-A: THE TARGETS, AND FUNDING

Row	Particulars	2024	2025	2026	2027-2029	2030	Total
1.1	Montreal Protocol reduction schedule of Annex C, Group I substances (ODP tonnes)	0.09	0.04	0.04	0.04	0	n/a
1.2	Maximum allowable total consumption of Annex C, Group I substances (ODP tonnes)	0.09	0.04	0.04	0.04	0	n/a
2.1	Lead IA (UNEP) agreed funding (US $)	150,000	0	**335,500**	0	42,000	**527,500**
2.2	Support costs for Lead IA (US $)	19,500	0	**43,126**	0	**5,399**	**68,025**
3.1	Total agreed funding (US $)	150,000	0	**335,500**	0	42,000	**527,500**
3.2	Total support costs (US $)	19,500	0	**43,126**	0	**5,399**	**68,025**
3.3	Total agreed costs (US $)	169,500	0	**378,626**	0	**47,399**	**595,525**
4.1.1	Total phase-out of HCFC-22 agreed to be achieved under this Agreement (ODP tonnes)						0.09
4.1.2	Phase-out of HCFC-22 to be achieved in the previous stage (ODP tonnes)						0.05
4.1.3	Remaining eligible consumption for HCFC-22 (ODP tonnes)						0.00

*Date of completion of stage I as per decision 87/28: 31 December 2022

Annex II

DRAFT AGREEMENT BETWEEN THE GOVERNMENT OF THE COMOROS AND THE EXECUTIVE COMMITTEE OF THE MULTILATERAL FUND FOR THE REDUCTION IN CONSUMPTION OF HYDROFLUOROCARBONS IN ACCORDANCE WITH STAGE I OF THE KIGALI HFC IMPLEMENTATION PLAN

(Period: 2026–2030)

Purpose

1. This Agreement represents the understanding of the Government of the Comoros ("the Country") and the Executive Committee with respect to the reduction of controlled use of Annex F substances set out in Appendix 1-A ("The Substances") to a sustained level of 26,209 CO_2-equivalent (CO_2-eq) tonnes by 1 January 2030 in compliance with the Montreal Protocol schedule and the terms of this Agreement.

2. The Country agrees to meet the annual consumption limits of Annex F substances as set out in row 1.2 of Appendix 2-A ("The Targets, and Funding") in this Agreement as well as in the Montreal Protocol reduction schedule for Annex F substances mentioned in Appendix 1-A. The Country accepts that, by its acceptance of this Agreement and performance by the Executive Committee of its funding obligations described in paragraph 3, it is precluded from applying for or receiving further funding from the Multilateral Fund in respect to any consumption of Annex F substances that exceeds the level defined in row 1.2 of Appendix 2-A as the final reduction step under this Agreement for Annex F substances specified in Appendix 1-A.

3. Subject to compliance by the Country with its obligations set out in this Agreement, the Executive Committee agrees, in principle, to provide the funding set out in row 3.1 of Appendix 2-A to the Country. The Executive Committee will, in principle, provide this funding at the Executive Committee meetings specified in Appendix 3-A ("Funding Approval Schedule").

4. The Country agrees to implement this Agreement in accordance with stage I of the Kigali HFC implementation plan ("the Plan") as approved. In accordance with subparagraph 5(b) of this Agreement, the Country will accept independent verification of the achievement of the annual consumption limits of Annex F substances set out in row 1.2 of Appendix 2-A of this Agreement. The aforementioned verification will be commissioned by the relevant bilateral or implementing agency.

Conditions for funding release

5. The Executive Committee will only provide the Funding, in accordance with the Funding Approval Schedule, when the Country satisfies the following conditions at least 10 weeks in advance of the applicable Executive Committee meeting set out in the Funding Approval Schedule:

(a) That the Country has met the Targets set out in row 1.2 of Appendix 2-A for all relevant years. Relevant years are all years since the year in which this Agreement was approved. Years for which there are no due country programme implementation reports at the date of the Executive Committee meeting at which the funding request is being presented are exempted;

(b) That the meeting of these Targets has been independently verified for all relevant years, unless the Executive Committee decided that such verification would not be required;

(c) That the Country had submitted a Tranche Implementation Report in accordance with Appendix 4-A ("Format of Tranche Implementation Reports and Plans") covering each previous calendar year; that it had achieved a significant level of implementation of

activities initiated with previously approved tranches; and that the rate of disbursement of funding available from the previously approved tranche was more than 20 per cent; and

(d) That the Country has submitted a Tranche Implementation Plan in accordance with Appendix 4-A covering each calendar year until and including the year for which the Funding Approval Schedule foresees the submission of the next tranche or, in case of the final tranche, until completion of all activities foreseen.

Monitoring

6. The Country will ensure that it conducts accurate monitoring of its activities under this Agreement. The institutions set out in Appendix 5-A ("Monitoring Institutions and Roles") will monitor and report on implementation of the activities in the previous Tranche Implementation Plans in accordance with their roles and responsibilities set out in the same appendix.

Flexibility in the reallocation of funds

7. The Executive Committee agrees that the Country may have the flexibility to reallocate part or all approved funds, according to the evolving circumstances, to achieve the smoothest reduction of consumption and phase-down of Annex F substances specified in Appendix 1-A, in accordance with the following considerations:

(a) Reallocations categorized as major changes must be documented in advance, either in a Tranche Implementation Plan as foreseen in subparagraph 5(d) above, or as a revision to an existing Tranche Implementation Plan to be submitted 10 weeks prior to any meeting of the Executive Committee, for its approval. Major changes would relate to:

(i) Issues potentially concerning the rules and policies of the Multilateral Fund;

(ii) Changes that would modify any clause of this Agreement;

(iii) Changes in the annual levels of funding allocated to the individual bilateral or implementing agencies for the different tranches;

(iv) Provision of funding for activities not included in the current endorsed Tranche Implementation Plan, or removal of an activity in the Tranche Implementation Plan, with a cost greater than 30 per cent of the total cost of the last approved tranche;

(v) Changes in alternative technologies, on the understanding that any submission for such a request would identify the associated incremental costs, the potential impact on the climate, and any differences in CO_2-eq tonnes to be phased down if applicable, as well as confirm that the Country agrees that potential savings related to the change of technology would accordingly decrease the overall funding level under this Agreement;

(b) Reallocations not categorized as major changes may be incorporated into the approved Tranche Implementation Plan, under implementation at the time, and reported to the Executive Committee in the subsequent Tranche Implementation Report; and

(c) Any remaining funds held by the bilateral or implementing agencies or the Country under the Plan will be returned to the Multilateral Fund upon completion of the last tranche foreseen under this Agreement.

8. Specific attention will be paid to the execution of activities in the refrigeration servicing sector included in the Plan, in particular that the Country may use the flexibility available under this Agreement to address specific needs that might arise during project implementation.

Bilateral and implementing agencies

9. The Country agrees to assume overall responsibility for the management and implementation of this Agreement and of all activities undertaken by it or on its behalf to fulfil the obligations under this Agreement. UNEP has agreed to be the lead implementing agency (the "Lead IA") and UNIDO has agreed to be the cooperating implementing agency (the "Cooperating IA") under the lead of the Lead IA in respect of the Country's activities under this Agreement. The Country agrees to evaluations, which might be carried out under the evaluation work programme of the Multilateral Fund or under the evaluation programme of the Lead IA and/or Cooperating IA taking part in this Agreement.

10. The Lead IA will be responsible for ensuring coordinated planning, implementation and reporting of all activities under this Agreement, including but not limited to the independent verification as per subparagraph 5(b). The Cooperating IA will support the Lead IA by implementing the Plan under the overall coordination of the Lead IA. The roles of the Lead IA and Cooperating IA are contained in Appendix 6-A and Appendix 6-B, respectively. The Executive Committee agrees, in principle, to provide the Lead IA and the Cooperating IA with the fees set out in rows 2.2 and 2.4 of Appendix 2-A.

Non-compliance with the Targets in the Agreement

11. Should the Country, for any reason, not meet the Targets for the elimination of Annex F substances set out in row 1.2 of Appendix 2-A or otherwise does not comply with this Agreement, then the Country agrees that it will not be entitled to the Funding in accordance with the Funding Approval Schedule. At the discretion of the Executive Committee, funding will be reinstated according to a revised Funding Approval Schedule determined by the Executive Committee after the Country has demonstrated that it has satisfied all its obligations that were due to be met prior to receipt of the next tranche of funding under the Funding Approval Schedule. The Country acknowledges that the Executive Committee may reduce the amount of the Funding by the amount set out in Appendix 7-A ("Reductions in Funding for Failure to Comply") in respect of each CO_2-eq kg of reductions in consumption not achieved in any one year. The Executive Committee will discuss each specific case in which the Country did not comply with this Agreement and take related decisions. Once decisions are taken, the specific case of non-compliance with this Agreement will not be an impediment for the provision of funding for future tranches as per paragraph 5 above.

12. The Funding of this Agreement will not be modified on the basis of any future Executive Committee decisions that may affect the funding of any other consumption sector projects or any other related activities in the Country.

13. The Country will comply with any reasonable request of the Executive Committee, the Lead IA and the Cooperating IA to facilitate implementation of this Agreement. In particular, it will provide the Lead IA and the Cooperating IA with access to the information necessary to verify compliance with this Agreement.

Date of completion

14. The completion of the Plan and the associated Agreement will take place at the end of the year following the last year for which a maximum allowable total consumption level has been specified in Appendix 2-A. Should at that time there still be activities that are outstanding, and which were foreseen in the last Tranche Implementation Plan and its subsequent revisions as per subparagraph 5(d) and paragraph 7, the completion of the Plan will be delayed until the end of the year following the implementation of the remaining activities. The reporting requirements as per subparagraphs 1(a), 1(b),

and 1(d) of Appendix 4-A will continue until the time of the completion of the Plan unless otherwise specified by the Executive Committee.

Validity

15. All conditions set out in this Agreement are undertaken solely within the context of the Montreal Protocol and as specified in this Agreement. All terms used in this Agreement have the meaning ascribed to them in the Montreal Protocol unless otherwise defined herein.

16. This Agreement may be modified or terminated only by mutual written agreement of the Country and the Executive Committee of the Multilateral Fund.

APPENDICES

APPENDIX 1-A: THE SUBSTANCES

Substances	Starting point for aggregate reductions in consumption (CO_2-eq tonnes)
HFCs	n/a

APPENDIX 2-A: THE TARGETS, AND FUNDING

Row	Particulars		2026	2027	2028	2029	2030	Total
1.1	Montreal Protocol reduction schedule of Annex F substances	%	freeze	freeze	freeze	10	10	n/a
		CO_2-eq tonnes	34,958	34,958	34,958	31,462	31,462	n/a
1.2	Maximum allowable total consumption of Annex F substances	Reduction in %	0.0	0.0	10.0	17.5	25.0	n/a
		CO_2-eq tonnes	34,958	34,958	31,462	28,836	26,209	n/a
2.1	Lead IA (UNEP) agreed funding (US $)		55,850	0	28,150	0	0	84,000
2.2	Support costs for Lead IA (US $)		7,260	0	3,660	0	0	10,920
2.3	Cooperating IA (UNIDO) agreed funding (US $)		32,000	0	46,000	0	0	78,000
2.4	Support costs for Cooperating IA (US $)		4,160	0	5,980	0	0	10,140
3.1	Total agreed funding (US $)		87,850	0	74,150	0	0	162,000
3.2	Total support costs (US $)		11,420	0	9,640	0	0	21,060
3.3	Total agreed costs (US $)		99,270	0	83,790	0	0	183,060

APPENDIX 3-A: FUNDING APPROVAL SCHEDULE

1. Funding for the future tranches will be considered for approval at the second meeting of the year specified in Appendix 2-A.

APPENDIX 4-A: FORMAT OF THE TRANCHE IMPLEMENTATION REPORTS AND PLANS

1. The submission of the Tranche Implementation Report and Plans for each tranche request will consist of four parts:

(a) A narrative report, with data provided by tranche, describing the progress achieved since the previous report, reflecting the situation of the Country in regard to phase-down of Annex F substances, how the different activities contribute to it, and how they relate to each other, including, where applicable, activities related to energy efficiency approved in the context of HFC phase-down pursuant to decision 91/65. The report should include the amount of Annex F substances consumption reduced as a direct result of the

implementation of activities, by substance, the alternative technology used and the related phase in of alternatives, to allow the Secretariat to inform the Executive Committee on the resulting change in climate relevant emissions. The report should also include quantitative information on the activities implemented and further highlight the successes, experiences, and challenges related to the different activities included in the Plan, reflecting any changes in the circumstances in the Country, and providing other relevant information. The report should also include information on and justification for any changes vis-à-vis the previously submitted Tranche Implementation Plan(s), such as delays, use of flexibility for the reallocation of funds during implementation of a tranche as provided for in paragraph 7 of this Agreement, or other changes;

(b) An independent verification report on the Plan's results and the consumption of Annex F substances, as per subparagraph 5(b) of the Agreement. If not decided otherwise by the Executive Committee, such a verification of consumption data must be provided with each tranche request, covering all relevant years for which a verification report has not yet been acknowledged by the Committee, as specified in subparagraph 5(a) of the Agreement;

(c) A written description of the activities to be undertaken during the period covered by the requested tranche including quantitative information, highlighting implementation milestones, the time of completion and the interdependence of the activities, and taking into account experiences made and progress achieved in the implementation of earlier tranches; the data in the Plan will be provided by calendar year. The description should include a reference to the overall Plan and progress achieved, as well as any possible changes to the overall Plan that are foreseen. The description should also specify and explain in detail such changes to the overall Plan. This description of future activities can be submitted as a part of the same document as the narrative report under subparagraph 1(a) above; and

(d) An Executive Summary of about five paragraphs, summarizing the information contained in subparagraphs 1(a) to 1(c) above.

APPENDIX 5-A: MONITORING INSTITUTIONS AND ROLES

1. All monitoring activities will be coordinated and managed through the national ozone unit (NOU), under the Country's Ministry of the Environment in Charge of Tourism, in close cooperation with relevant authorities and with assistance of the Lead IA and the Cooperating IA. The NOU has general responsibility for the implementation of activities under the Plan, including training programmes, technical assistance and awareness-raising; for ensuring long-term sustainability of the impact of those activities on the reduction of HFC consumption and use; and for monitoring the sustainability of the consumption reduction targets achieved through this Agreement. The NOU will be in continuous contact with stakeholders and other market actors to monitor trends and ensure compliance with the strategy and the plan put in place.

2. The General Directorate of Customs and Indirect Duties manages the customs formalities regarding the importation of controlled substances. The consumption of controlled substances will be monitored and determined based on official import and export data recorded by relevant Government departments. The NOU shall compile data and report to the Ozone Secretariat on an annual basis, on or before the relevant due dates, on the consumption of controlled substances, and to the Multilateral Fund Secretariat on progress in the Plan's implementation.

APPENDIX 6-A: ROLE OF THE LEAD IMPLEMENTING AGENCY

1. The Lead IA will be responsible for a range of activities, including at least the following:

   (a) Ensuring performance and financial verification in accordance with this Agreement and with its specific internal procedures and requirements as set out in the Country's Plan;

   (b) Assisting the Country in the preparation of the Tranche Implementation Reports and Plans as per Appendix 4-A;

   (c) Providing independent verification to the Executive Committee that the Targets have been met and associated tranche activities have been completed as indicated in the Tranche Implementation Plan, consistent with Appendix 4-A;

   (d) Ensuring that the experiences and progress are reflected in the updates to the overall Plan and in the future Tranche Implementation Plans, consistent with subparagraph 1(c) of Appendix 4-A;

   (e) Fulfilling the reporting requirements of the Tranche Implementation Reports and Plans and of the overall Plan as specified in Appendix 4-A for submission to the Executive Committee, including the activities implemented by the Cooperating IA;

   (f) In the event that the last funding tranche is requested one or more years prior to the last year for which a consumption target had been established, annual Tranche Implementation Reports and, where applicable, verification reports on the current stage of the Plan should be submitted until all activities foreseen had been completed and HFC consumption targets had been met;

   (g) Ensuring that appropriate independent technical experts carry out the technical reviews;

   (h) Carrying out the required supervision missions;

   (i) Ensuring the presence of an operating mechanism to allow for an effective and transparent implementation of the Tranche Implementation Plan and accurate data reporting;

   (j) Coordinating the activities of the Cooperating IA and ensuring the appropriate sequence of activities;

   (k) In case of reductions in funding for failure to comply in accordance with paragraph 11 of the Agreement, to determine, in consultation with the Country and the Cooperating IA, the allocation of the reductions to the different budget items and to the funding of the Lead IA and each Cooperating IA;

   (l) Ensuring that disbursements made to the Country are based on the use of the indicators;

   (m) Providing assistance with the policy, management and technical support when required;

   (n) Reaching consensus with the Cooperating IA on any planning, coordination and reporting arrangements required to facilitate the implementation of the Plan; and

   (o) Timely releasing funds to the Country/participating enterprises for completing the activities related to the project.

2. After consultation with the Country and taking into account any views expressed, the Lead IA will select and mandate an independent entity to carry out the verification of the Plan's results and of the consumption of Annex F substances mentioned in Appendix 1-A, as per subparagraph 5(b) of the Agreement and subparagraph 1(b) of Appendix 4-A.

APPENDIX 6-B: ROLE OF THE COOPERATING IMPLEMENTING AGENCIES

1. The Cooperating IA will be responsible for a range of activities. These activities are specified in the Plan, including at least the following:

(a) Providing assistance for policy development when required;

(b) Assisting the Country in the implementation and assessment of the activities funded by the Cooperating IA, and referring to the Lead IA to ensure a coordinated sequence of activities;

(c) Providing reports to the Lead IA on these activities, for inclusion in the consolidated reports as per Appendix 4-A; and

(d) Reaching consensus with the Lead IA on any planning, coordination and reporting arrangements required to facilitate the implementation of the Plan.

APPENDIX 7-A: REDUCTIONS IN FUNDING FOR FAILURE TO COMPLY WITH THE TARGETS IN THE AGREEMENT

1. In accordance with paragraph 11 of the Agreement, the amount of funding provided may be reduced by US $7.00 per CO_2-eq tonne 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, on the understanding that the maximum funding reduction would not exceed the funding level of the tranche being requested. Additional measures might be considered in cases where non-compliance extends for two consecutive years. Where the Country has failed to comply with the Agreement due to illegal trade, the reduction in funding would not be applied if the illegally traded controlled substances are seized and subsequently confiscated, destroyed, exported, or returned to the country of origin.

Annex III

SIMULTANEOUS IMPLEMENTATION OF THE HCFC PHASE-OUT MANAGEMENT PLAN AND THE KIGALI HFC IMPLEMENTATION PLAN IN THE COMOROS

Category of activity	HPMP – stage II		KIP – stage I		HPMP+KIP combined cost (US $)
	Activity	Cost (US $)	Activity	Cost (US $)	
Strengthening of the monitoring and control measures and capacity building for customs and enforcement officers	Review and update of existing HCFC related regulations and drafting of new regulations regarding refrigerants alternative to HCFCs	15,000	Strengthening of the HFC quota allocation methodology including consultation and workshops for stakeholders, and study on electronic licensing system to strengthen HFC controls and improve data quality	10,600	25,600
	Training of 15 customs trainers and 180 customs and enforcement officers and clearing agents on the identification and control of HCFCs, HFCs and related equipment	105,500	Updating the customs training curriculum to include refrigerant flammability, safe handling, and MAC sector considerations; and training of 50 customs and enforcement officers on HFC control measures	18,500	124,000
	Five refrigerant identifiers for the NOU	30,000	Two refrigerant identifiers for customs entry points	12,000	42,000
	Facilitation of dialogue, coordination and collaboration among the islands	20,000			20,000
Technician training, certification scheme and provision of equipment	Development of regulatory standards and protocols on the use of flammable and toxic substances in RAC (US $30,000); and training of 315 technicians on good practices, brazing and safe handling of HCs (US $101,000)	131,000	Adapting the training curriculum for the MAC sector; and training of 25 technicians on refrigerant recovery, leakage detection and prevention, proper servicing practices, and the safe handling of A2L refrigerants	11,900	142,900
	Establishment of a certification scheme for RAC technicians, including training on international standards and safe handling of F-gases, stakeholder consultations, and certification of 30 technicians	30,000	Supporting the introduction of the technician certification scheme implemented under the HPMP and extending it to MAC and domestic refrigeration technicians	10,000	40,000
	Procurement and distribution of 20 toolkits and equipment for refrigerant recovery and leak detection to selected 18 RAC workshops and the National School of Technical and Vocational Training (ENTP)	20,000	Provision of toolkits and equipment for refrigerant recovery and leak detection to 8 additional RAC workshops (US $10,000); and procurement and delivery of 8 recovery machines with filters and 16 cylinders to 8 MAC servicing workshops (US S10,000)	20,000	40,000
	Strengthening of the RAC association and the ENTP through training of trainers, including on the use of equipment	30,000	Identification of informal non-RAC technicians (e.g., plumbers or electricians) servicing domestic refrigerators; development of a simplified curriculum to familiarize those technicians with RAC servicing; and training of	16,500	46,500

Category of activity	HPMP – stage II		KIP – stage I		HPMP+KIP combined cost (US $)
	Activity	**Cost (US $)**	**Activity**	**Cost (US $)**	
			50 of those technicians to encourage formalization and RAC association membership		
	Promoting the participation of young women in the sector through awareness-building activities and training	18,000			18,000
Technical support for the fisheries sector			Study to determine the number, location and condition of refrigeration units in the sector and the refrigerants they use, and to identify candidates for demonstration projects	3,000	3,000
			Demonstration project #1: Replacement of an R-404A-based ice machine with an R-717-based flake ice machine at one fishmonger, technical support, training and monitoring	30,000	30,000
			Demonstration project #2: Replacement of one HFC-based refrigeration system by an R-290 monobloc cold room unit at one fishmonger, technical support, training and monitoring	13,000	13,000
			Dissemination of results of demonstration projects	3,000	3,000
Project management and monitoring	Consultants, monitoring-related travel, meetings, and follow-up activities	28,000	Consultants, coordination- and monitoring-related travel, and other expenses	13,500	41,500
Total		**427,500**		**162,000**	**589,500**
Percentage of total (%)		**73**		**27**	**100**