ISSUES PAPER
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THE FACILITY FOR ADDITIONAL INCOME
UNDP INPUTS ON CARBON MARKETS AS A POTENTIAL FINANCING SOURCE

INTRODUCTION

At the request of the Executive Committee to the Multilateral Fund, the Fund Secretariat has been exploring the possibility of a Facility for Additional Income ('the Facility') to address the climate benefits related to the Montreal Protocol's activities. The Fund Secretariat has issued two papers on the subject, for the 57th and 58th Meeting, and is preparing a revised paper for the 59th Meeting.

At the request of the Fund Secretariat, UNDP has prepared this Issues Paper on the role of carbon markets as a financing source for the Facility. UNDP recognizes the broader ongoing discussions on other sources of co-financing, however, in order to be focused, this paper specifically concentrates on the carbon markets.

Overall, given their current size and growth potential, UNDP believes the exploration of the global carbon markets as a source of co-financing for climate benefits is interesting for the Montreal Protocol community. The comments provided in this Issues Paper are given with the objective of identifying what steps would be necessary to successfully achieve co-financing by the carbon markets.

This Issues Paper is organized as follows:

- In Section 1, some key considerations for the Facility with regard to the carbon markets are set out.
- In Section 2, UNDP's proposal for accessing the carbon markets, the ODS Climate Facility, is described.
- In the Annex, for ease of reference, certain key terms in the carbon markets are explained.

The current design of the Facility remains at a preliminary stage. If the specific goal of co-financing in the carbon markets is to be successfully achieved by the Facility, UNDP believes that it will be necessary to fully address the considerations set out in Section 1. As such, it is hoped that the detailed description of the ODS Climate Facility, which is expressly designed to access the carbon markets as a financing source, can be helpful as the design process moves forward.

1. KEY CONSIDERATIONS FOR THE FACILITY WITH REGARD TO THE CARBON MARKETS

This section identifies a number of key themes for the Facility related to accessing the carbon markets to finance climate benefits.

1.1 Addressing the full scope of climate benefits through the carbon markets

There are potentially 3 forms of interactions with the carbon markets:

- Energy efficiency gains from HCFC phase-out (CDM)
- Direct emission avoidance from HCFC phase-out (voluntary carbon markets)
- Direct emission avoidance from ODS destruction (voluntary carbon markets)

A current objective of the Facility is to address the climate benefits from energy efficiency under the Kyoto Protocol's CDM. This is understandable, as the CDM is a well-established carbon mechanism and is underpinned by a defined oversight framework. At the same time, the contribution of energy efficiency climate benefits may be relatively minor in the key sectors in which HCFC phase-out will take place. This will likely result in small financial flows and make transactions costs a sensitive issue.

With these facts in mind, UNDP suggests that consideration is given to expanding the Facility's carbon market interactions to include direct emissions from both HCFC phase-out and ODS destruction activities (collectively, 'ODS Direct Emissions'). UNDP is aware that the inclusion of ODS destruction activities may depart from the mandate given by the Executive Committee to focus the current work of the Facility on HCFC phase-out (Decision XIX/6). However, targeting ODS Direct Emissions in their entirety will address the full range of climate benefits, with the largest greenhouse gas (GHG) impacts, and will maximize the possible financial flows from the carbon markets.

It can be noted that the inclusion of ODS destruction activities can often be organized in association with early retirement programmes which provide major energy efficiency benefits, and where currently organizations such as GEF are taking the lead.

1.2 The need for further development of the nascent carbon markets for ODS Direct Emissions

Currently, ODS Direct Emissions are not recognized by the oversight frameworks which create and drive the compliance carbon markets. Rather, they are new and innovative areas of the voluntary carbon markets.

The fact that ODS Direct Emissions are a nascent part of the voluntary carbon markets raises a number of issues. The necessary oversight framework to ensure high quality, robust credits for ODS Direct Emissions is only now beginning to be developed by certain voluntary carbon market standards, and the quality of these standards is not yet assured. Equally importantly, demand for credits from ODS Direct Emissions under the voluntary market is uncertain and is likely to be low. This is because buyers in the voluntary market are often more discerning than those in the compliance market, requiring that the project type has a good story-line and track record. UNDP has some concern that ODS credits in the voluntary market may not be seen as attractive by many voluntary buyers who will not share the insights of the Montreal Protocol community itself.

To the extent that ODS Direct Emissions are included, a considerable risk for the design of the Facility would be to assume that mature voluntary markets for ODS credits exist. The required level of market maturity may never materialize.

UNDP suggests that consideration is given to a design for the Facility that specifically assists in the development of the currently immature carbon markets for ODS Direct Emissions. In the long term, UNDP believes that the goal should be for ODS Direct Emissions to be part of the compliance markets. Such an approach is set out in Section 2, where one of the main purposes of UNDP's proposal for the ODS Climate Facility is to achieve this objective.

1.3 Form of investment by the Facility and alignment with carbon market practice

The carbon markets, such as the CDM, are market mechanisms with particular characteristics and practices. If the Facility is to effectively develop and harness the carbon markets to finance climate benefits in the short term, it is important that the Facility engages carbon market norms and is simply structured, thereby incentivizing private sector participation and earning widespread credibility.

With a view to maximizing the smooth integration of the Facility to the carbon markets, UNDP suggests that consideration is given to the following:

- First, that the Facility conforms to market practice and provides its carbon-based co-financing to projects through an Emission Reduction Purchase Agreement ('ERPA'). An ERPA is the established contractual approach for purchase of credits between buyer and seller.
- Secondly, that the Facility - at least in its initial form - does not seek to be self-financing through claiming a share of a project's credits in return for its co-financing investment. Such an approach can insert additional complexity, with the considerable risk of turning away private sector involvement.

UNDP recognizes that the direction of the above suggested approaches may introduce apprehensions in governments that are not comfortable with a carbon market objective, and who would prefer the Facility as a vehicle for other sources of co-financing, such as direct grants. However, it needs to be recognized that structures that are optimal for interaction with the carbon market may not be optimal for other forms of co-financing. Grant based co-financing will likely undermine any concurrent ERPA-based approach in the eyes of the carbon markets. A key challenge in the design of the Facility is in reconciling the interests of a number of disparate stakeholders simultaneously.

1.4 Near term delinking from HPMPs for practical purposes

With the advent of HPMPs, there is theoretically the possibility to link ozone and climate financing for all HPMPs through the Facility and the Multilateral Fund's existing activities, creating a one-stop-shop financing solution for Article 5 countries.

In the long term, UNDP would welcome the exploration of such a linkage. In the immediate term, for practical reasons, UNDP recommends that there is no obligation for the Facility to finance the climate benefits of HPMPs themselves, as this will avoid unnecessarily delaying HPMPs which are about to launch.

1.5 The possible impact on the carbon markets of the current proposal to amend the Montreal Protocol to include HFCs

It is worth noting that the current proposal for inclusion of HFCs under the Montreal Protocol, if adopted, will limit the scope of the carbon markets to provide co-financing for climate benefits related to HCFC phase-out.

Decision XIX/6 provides the opportunity to make strides in reducing greenhouse gas emissions of HCFCs which themselves have significant global warming potentials (e.g. HCFC-22 with a GWP of 2270). However, as there is currently no obligation to adopt the most climate beneficial solution, the cost of adopting technologies with lower climate impact is considered 'additional' in the carbon markets, hence qualifying for appropriate carbon credits.

The introduction of an HFC phase-down, depending on its specific timing, could drive a much stronger presumption against HFC-based projects and would make it more difficult to establish the "additionality" threshold. If so, HCFC-phase out could largely be ruled out of carbon markets co-financing, although early avoidance of HCFCs (i.e. ahead of the HCFC phase-out schedule) could be counted as an acceleration and still qualify if high GWP alternatives remain an option at project level.

1.6 Summary

As set out above, a key challenge with respect to carbon markets will be the currently immature nature of these markets for ODS destruction, and the need to assist in their development. Another key challenge arises from reconciling the design needs of housing multiple sources of co-financing within the Facility.

If co-financing from the carbon markets is to be successfully achieved, UNDP suggests an approach focused on developing and exploring carbon markets, delinked initially from the Montreal Protocol compliance, and which would conform in its practices with standard carbon market norms. This approach is taken with the ODS Climate Facility and is set out in the next section.

2. UNDP'S PROPOSAL TO ESTABLISH CARBON MARKETS AS A SOURCE OF CO-FINANCING FOR CLIMATE BENEFITS.

At a side-event at the 57th Meeting, UNDP put forward a proposal on carbon markets, including an ODS Climate Facility. This proposal has now been further refined. This section sets out key components of the proposal.

2.1. Objectives of UNDP's proposal

The objective behind UNDP's proposal is to explore a pathway to establishing the carbon markets as the source of financing for climate benefits. This objective can be split into 2 phases.

- Phase I: Setting up an interim ODS Climate Facility, which would consist of a donor-led fund and an accompanying oversight framework to facilitate the purchase of credits from ODS Direct Emissions (HCFC phase-out and ODS destruction) projects. The purpose of the ODS Climate Facility would be to gain experiences across project types and to set an example, thereby helping establish credibility and develop the carbon markets. It is important to note that the ODS Climate Facility would not represent an irrevocable commitment by the Montreal Protocol community to the carbon markets, but is instead an exploratory and preparatory initial step, which may be terminated or followed by a subsequent Phase II.

- Phase II: Linkage of ODS Direct Emissions to the compliance carbon markets. Should the ODS Climate Facility be regarded as successful, the objective can be to build on its experiences and to include the category of ODS Direct Emissions in a future compliance carbon markets regime – for example, a post 2020 international agreement. Once linked to the compliance carbon markets, the ODS Climate Facility's fund component would no longer be necessary to ensure demand for ODS credits, as this demand could come from the compliance market. The ODS Climate Facility's oversight framework would remain in place and be further developed as the oversight instrument for any compliance markets mechanism.

Overall, if the carbon markets are to be a source of financing for climate benefits, UNDP believes that the long term objective should be the compliance markets, with the voluntary markets only as an interim step. The ODS Climate Facility effectively acts as a 'controlled' or 'contained' instrument in the voluntary market, prior to the real objective of inclusion of ODS Direct Emissions in the compliance markets.

2.2 ODS Climate Facility: possible structure

Structurally, the ODS Climate Facility can be seen to have two key functional components: a fund and an oversight framework. These components could either be established within the Montreal Protocol Bodies (including the Multilateral Fund) or at the Implementing Agency level (for example UNDP, the World Bank).

Three possible structural configurations for the ODS Climate Facility can be envisaged:

Configuration	Fund	Oversight Framework
#1	Multilateral Fund	Montreal Protocol Bodies
#2	Implementing Agencies	Montreal Protocol Bodies
#3	Implementing Agencies	Implementing Agencies

The selection of an appropriate configuration can be a function of a number of factors. Considerations may include:

- The need for the Executive Committee, and/or the parties to the Montreal Protocol, to get involved with carbon market mechanisms directly.
- In respect of the management of the fund, the existing experience of the Implementing Agencies with the carbon markets may be a relative strength, for instance in contractual aspects such as entry into ERPAs to acquire credits.
- For the oversight framework, the Montreal Protocol bodies are particularly well suited, given their long-standing technical expertise with ODS banks and transition technologies, accounting of ODS trends and ODS project validation capabilities.

2.3 ODS Climate Facility: fund component

Within the ODS Climate Facility, the objective of the fund component is to provide financing for climate benefits, by purchasing and ensuring demand for ODS credits generated by projects under the ODS Climate Facility's oversight framework. The fund is necessary because in the current absence of compliance markets, demand in the voluntary market for ODS credits is uncertain and likely to be low.

2.3.1 Fund sponsors

The ODS Climate Facility's fund, or funds (if an Implementing Agency based funding model is taken), can be capitalized by sponsors, whether governments or private sector, that support the ODS Climate Facility's objective.

As a result of its purchases, the fund(s) would acquire ODS credits whose ownership would be pro-rated to sponsors according to their contribution to the fund(s). These ODS credits could either be held in the fund(s) or retired on behalf of donors.

2.3.2. Fund investment approach

ERPA Modality

The fund(s) would make financing investments in projects for the climate benefits, utilizing the standard carbon market contractual modality of an ERPA, where the unit of account is a credit representing 1 tonne of CO2e. The Fund would enter into an ERPA with each ODS Direct Emission project at the beginning of its project cycle, according to which the Fund will agree to pay a set price per ODS credit, for an agreed volume of ODS credits to be delivered over an agreed period of time.

Pricing Mechanism under ERPA

A key aspect of the fund(s)' ERPAs would be to take a 'cost-plus' approach to pricing the ODS Credits under the ERPA. This 'cost-plus' pricing would mean that the purchase price being offered will differ from one category of project to another, so that a more costly technology type for addressing ODS Direct Emissions, for example ODS recovery from foams, would receive a higher price per ODS credit.

This 'cost-plus' pricing will have a number of benefits:

- It will maximize the number of projects financed under the fund, as the fund will not overpay
- The fund(s) will not pay a high price per ODS credit for so called 'low-hanging fruit' project types which have a very low cost. In this way, this will avoid a re-occurrence under the ODS Climate Facility of the HFC-23 scenario under the CDM.

A further valuable role of the ODS Climate Facility would be to gather and publicly disseminate information on costs and pricing of different technology types. It is possible that there will be a certain level of other voluntary carbon market activity on ODS Direct Emissions outside the ODS Climate Facility. Information on pricing and real costs disseminated by the ODS Climate Facility can moderate any external prices being paid, again acting against a 'low-hanging fruit' scenario.

Advance Payment under ERPA

Some ODS Direct Emissions project types may have substantial up-front costs, and projects may have difficulty accessing financing to cover these up-front costs. Typically, carbon credit buyers make their payments under an ERPA on an annual basis during the lifetime of the project, when the project delivers its annual credits to the buyer. However, for these projects types with substantial up-front costs, it can be possible for advance payments to be made under the ODS Climate Facility's ERPAs at the beginning of the project cycle, thereby addressing this issue.

2.4 ODS Climate Facility: oversight framework

Within the ODS Climate Facility, the objective of the oversight framework would be to ensure that the ODS credits generated by its projects, and purchased by its fund(s), are high quality and robust. The oversight framework will ensure high and uniform standards in quantifying the GHG benefits of ODS Direct Emissions, and tracking the use of ODS credits generated by these projects under appropriate registries. With the aim of developing the carbon markets, and in the absence of monitoring from the oversight bodies of compliance markets, the ODS Climate Facility's oversight framework can be key to raising the profile and credibility of ODS credits.

2.4.1 Approach to Oversight Framework.

There has recently been substantial activity in developing of protocols and methodologies for ODS destruction projects under two voluntary carbon market programmes, namely the Climate Action Reserve (CAR) and the Voluntary Carbon Standard (VCS). Both have the potential to be rigorous ODS protocols, with the CAR programme having slightly higher reputational value (and hence carbon price) while the VCS has the potential for wider geographic applicability than CAR – at least in the short-term.

The preferred oversight framework for the ODS Climate Facility is envisaged to combine complementary roles for the Montreal Protocol bodies and selected voluntary carbon market standards, maximizing existing expertise and sharing responsibilities. As such, it might be possible to see the content of the respective protocols reviewed by an Assessment Panel (most likely the TEAP) and the application of the protocol be addressed by the Fund Secretariat in a validation role at project level. This same oversight could also extend to the specific methodologies.

Similarly under the preferred oversight framework, since both voluntary carbon market programmes either already have, or are in the process of developing, registries that could be relied upon for tracking ODS Direct Emission projects, there appears to be no need to recreate these at Montreal Protocol level. However, it could be proposed that the Ozone Secretariat either directly, or via Parties, acts as a repository for ODS Direct Emission credit reports from the voluntary carbon market actors such as VCS and CAR. If such a reporting requirement could be enforced in some way, the Montreal Protocol community could keep an appropriate track on the credits being claimed.

As an alternative to the preferred oversight framework, it is possible that the Montreal Protocol community decides that it is not appropriate at this stage to be directly involved in the ODS Climate Facility, but rather that the ODS Climate Facility should be an Implementing Agency-led activity. In this scenario, the Implementing Agencies could establish an oversight framework in conjunction with selected reputable voluntary carbon market programmes.

2.5 ODS Climate Facility: projects and co-financing

2.5.1 Overview of projects

A key role of the Implementing Agencies, such as UNDP, would be to source and facilitate projects under the ODS Climate Facility. This role can involve identifying projects, assisting in preparation of project documentation, and assisting and overseeing the operation of the project activity.

Projects would be selected with the over-riding objective of the ODS Climate Facility acting to develop the carbon markets. The aim will be to gain a broad range of experiences, to understand the benefits and challenges of carbon markets as a financing source across different project types.

The project portfolio for the ODS Climate Facility would target the following general characteristics:

- It would be limited to (i) HCFC phase-out and (ii) ODS bank management
- It would encompass a range of geographies
- It would encompass a range of technology types, including refrigerants and foams, but needing to make case-by-case decisions on halon and CTC destruction
- It would include a range of project sizes, in order to better understand the impact of transaction costs
- The number of projects would be a function of the funding made available by sponsors and the size of the projects that are targeted

2.5.2 Co-financing of projects