Environmental Issues

Tom Cortina Halon Alternatives Research Corporation

International Fire & Cabin Safety Research Conference October 28, 2010 Atlantic City, New Jersey



Overview

Ozone Depletion

- Montreal Protocol
- EU ODS Regulations
- ICAO Resolution
- Climate Change
 - Science
 - Policy International, Europe, United States
 - Impact on Fire Protection



Montreal Protocol

- Montreal Protocol on Substances that Deplete the Ozone Layer is generally considered to be the most successful environmental treaty
- Over 190 countries agreed to a production phase out of ODS that has been implemented with relatively few compliance issues
- If remaining MP provisions are implemented, the concentration of ODS in the atmosphere is expected to fall to pre-ozone hole levels found in the early 1980s by around 2050



Montreal Protocol

- Phase out of halon production under the Montreal Protocol is complete worldwide
- Halon 1301 is still manufactured in Europe and China as feedstock for pesticide production
- Phase out of HCFC production for fire protection uses scheduled for 2020/2030
- Aviation currently developing a new halon alternative (BTP) that may have very small ODP
- HTOC has asked Parties for guidance on the viability of low-GWP, very low-ODP agents



EU ODS Regulations

- European Union banned all non-critical uses of halons in 2003
- Critical uses are listed in the current Annex VI to Commission Regulation (EC) No. 1005/2009
- All current onboard uses of halons in aviation are included on the critical use list
- Annex VI was revised in August and now contains "cut-off dates" for use of halons in new equipment or facilities and "end dates" when all halons must be decommissioned



EU ODS Regulations

- Dates for aviation critical uses (cut-off dates are for application for new Type Certificate):
- Cargo compartment fixed systems cut-off date is 2018, end date is 2040
- Cabin/crew portables 2014, 2025
- Engine nacelles and APU 2014, 2040
- Lavatory (potty bottles) 2011, 2020
- Dry bays 2011, 2040
- Inerting of fuel tanks 2011, 2040



- A new resolution on halon replacement was adopted at the 37th Session of the ICAO Assembly in September
- It replaces Resolution A36-12 adopted in 2007
- A36-12 was result of Montreal Protocol Decision XV/11 calling on TEAP to work with ICAO
- The new resolution was supported by the aviation industry (ICCAIA)



- Agrees with the urgency of the need to continue developing and implementing halon alternatives for civil aviation
- Urges States to intensify development of acceptable halon alternatives for fire extinguishing systems in cargo compartments and engine/APUs, and to continue work towards improving halon alternatives for hand-held fire extinguishers



- Directs the Council to establish a mandate for the replacement of halon:
 - in lavatory fire extinguishing systems used in aircraft
 produced after a specified date in the 2011 timeframe
 - in hand-held fire extinguishers used in aircraft
 produced after a specified date in the 2016 timeframe
 - in engine and auxiliary power unit fire extinguishing systems used in aircraft for which application for type certification will be submitted after a specified date in the 2014 timeframe



- Directs the Council to conduct regular reviews of the status of potential halon alternatives
- Urges States to verify the quality of halon and request certification documentation to a recognized international standard
- Encourages ICAO to continue collaboration with the IASFPWG and the UNEP HTOC
- Urges States to inform ICAO of halon reserves
 - Aviation halon use will continue for at least 30 years



- The ICAO Air Navigation Commission will consider proposed amendments to Annex 6 – Operation of Aircraft, and Annex 8 – Airworthiness of Aircraft, in order to implement the new resolution
- The ICAO Council must approve the changes to the Annexes by July 2011 in order to meet the dates mandated in the resolution



Climate Change - Science

- Intergovernmental Panel on Climate Change (IPCC) produces international assessments on the science of climate change
- Reports are produced and reviewed by over 2,000 contributors
- Completed 4th assessment report in 2007
- Most of the observed increase in globally averaged temperatures since the mid-20th century is very likely due to the increase in anthropogenic greenhouse gas concentrations"



- US National Academy of Sciences recently released three climate change reports requested by Congress that cover science, mitigation (limiting emissions), and adaptation
- Science report concludes that "climate change is occurring, is caused largely by human activities, and poses significant risks for a broad range of human and natural systems"
- Mitigation report concludes there is "urgent need for U.S. action to reduce greenhouse gas emissions"

















Source: J.R. Petit, J. Jouzel, et al. Climate and atmospheric history of the past 420 000 years from the Vostek ice core in Antarctice, Nature 399 (3JUne), pp 429-436, 1999.



- Recent revelations from emails about IPCC scientists "hiding" contradicting data
- Errors in 2007 IPCC report related to Amazon rain forest endangerment, Netherlands/sea level, Himalayan glaciers
- Raised questions about climate science and about the methods of the IPCC
- Independent scientific reviews have concluded that IPCC findings are generally sound
- Impact on public opinion about the climate issue







Kyoto Protocol

- Worldwide differentiated target of 5.2% reduction in GHG emissions from 1990 levels between 2008-2012
- CO₂, CH₄, N₂0, HFCs, PFCs, SF₆
- EU (-8%), Japan (-6%), U.S. (-7%, at +16%)
- No international policies and measures
- Many countries not on schedule to meet emission reduction targets



Kyoto Protocol Status

- Continued negotiations aimed at approval of legally binding treaty to replace Kyoto Protocol
- Commitments from large developing countries like China and India key issue
- Funding for developing countries key issue
- Lack of action by US damper on negotiations
- No agreement on new treaty this year, future prospects seem dim







Aviation

- GHG emissions from aviation are about 3.5% of global GHG emissions and grew about 65% from 1990-2005
- GHG emissions from aviation are not currently covered by Kyoto Protocol, instead are handled by ICAO
- Some countries have proposed including aviation emissions in any future international climate treaty



Aviation – ICAO Resolution

- A new resolution on GHG emissions from aviation was adopted at the 37th Session of the ICAO Assembly in October
- Global target of 2% increase in fuel efficiency per year until 2050
- Capping growth of aviation emissions in 2020
- CO₂ standard for aircraft engines by 2013
- Development of a framework for market-based measures



Climate Policy - Europe

- Main policy to address issue is EU emissions trading system (ETS) - covers only CO₂
- Now in its second phase (2008-2012)
- Covers 10,500 facilities in 27 EU countries (oil, steel, cement, glass, and paper)
- Covered facilities have a cap on CO₂ emissions and can sell or purchase additional allowances
- Allowance price is currently about 15 euros a ton, down from 29 euros on July 1, 2008



Climate Policy - Europe

- CO₂ emissions from aviation are not currently included in the EU ETS
- Plan is to include aviation emissions from 2012
- Cover all airlines flying in/out of EU airports
- One allowance for every ton of CO₂ emitted
- EU claims that new ICAO agreement clears way for inclusion of aviation emissions in ETS
- Plan is opposed by US airline industry



Climate Policy - United States

Congress

- Comprehensive climate legislation passed the House in June 2009
- Similar bills were introduced in the Senate in 2009 and 2010 but were never voted on
- Bills would create an economy-wide cap-andtrade program covering 85% of US GHGs
- Targets are 17-20% below 2005 levels in 2020, 83% below 2005 levels in 2050



Climate Policy - United States

Congress

- Bills did not cover aviation emissions directly, instead regulate transportation fuels at the point of production (refinery)
- Further consideration of climate legislation by the Senate this year is extremely unlikely
- If Republicans gain seats, unlikely Congress would address climate issue for next 2 years



Climate Policy - United States





- High-GWP Gases in Fire Protection
 - HFC-227ea 3,220 (GWP) (CO₂ = 1)
 - HFC-125 3,500
 - HFC-236fa 9,810
 - HFC-23 14,800
- Low GWP Alternatives
 - Non-HFC Chemical Agents (Fluoroketone, HCFCs)
 - Inert Gases
 - CO₂ (non-occupied spaces)
 - Water Mist
 - Aerosols
 - Inert Gas/Water Vapor



Montreal Protocol – HFC Proposals

 Two amendments have been proposed that would add HFCs to Montreal Protocol and slowly phase down their production

Key elements:

- List 20 specified HFCs as new Annex F to the Montreal Protocol
- Use baseline for developed countries of 2004-2006 production and consumption of HCFCs and HFCs
- Do not restrict the use of HFCs in fire protection



Montreal Protocol – HFC Proposals

- Mauritius and Micronesia:
- 15% reduction in 2013 70% in 2025
- 30% in 2016

- 85% in 2028
- 45% in 2019 90% in 2030
- 55% in 2022

Developing countries: 6-year grace period (2019-2036)

- United States, Canada and Mexico:
- 10% reduction in 2014 50% in 2025
- 20% in 2017 70% in 2029
- 30% in 2020 85% in 2033
- Developing countries: begin in 2017, reach 85% level in 2043



- Montreal Protocol HFC Proposals
 - Both proposals will be discussed at the Meeting of Parties in November
 - Similar proposals were rejected in 2009
 - Amendments may not be approved this year, but could be approved next year or soon after



- European Union F-Gas Regulation
 - Covers emissions of HFCs, PFCs, and SF₆
 - Does not prohibit the use of HFCs for fire protection
 - Most applications requires reporting, recovery containment, leak inspection, labeling, training
 - Compliance with industry standards such as ISO should meet most requirements
 - Regulation is up for review in 2011



US Congress – HFC Provisions

- All recent US climate bills have contained provisions to regulate the production of HFCs
- HFC provisions are generally supported by industry and environmental NGOs
- Could be attached to other bills or introduced as stand alone legislation



US Congress – HFC Provisions

- HFCs would be regulated separately from other GHGs under Title VI of Clean Air Act
- Slow phase down of production (GWPweighted) starting with 0-10% cut in 2012-2014, ending with 85% cut in 2030-2040
- Essential use, labeling, nonessential product, safe alternatives, and other provisions of Title
 VI would be extended to HFCs



- US Congress HFC Provisions
 - Essential use provisions are provided for fire suppression and aviation
 - Allowances required to produce or import HFCs, or import products containing HFCs
 - \$1.00/MT first year = \$1.46/lb of HFC-227ea

= \$4.46/lb of HFC-236fa

Offset credits for destruction of CFCs



Summary

Ozone Depletion

- Phase out of CFC and halon production is complete worldwide
- ICAO and EU have set dates for the replacement of halons in aviation
- Aviation industry needs to ensure that it will have adequate supplies of halon to service the worldwide fleet of aircraft for the next 30 years



Summary

Climate Change

- ICAO adopted a resolution focused on stabilizing GHG emissions from aviation
- EU plans to add aviation CO₂ emissions to its emission trading system
- Proposals have been made internationally and in US legislation to slowly phase down the overall production of HFCs



Summary

Stay tuned!

HARC 1001 19th Street North Suite 1200 Arlington, VA 22209 571-384-7914 571-384-7959 (fax) cortinaec@cox.net www.harc.org