UNEP

Informal Prior Informed Consent on Trade of Ozone Depleting Substances:

A Tool to Strengthen Enforcement of Licensing Systems








Content

Introduction

The year 2010 marked a milestone in the history of the Montreal Protocol on Substances that Deplete the Ozone Layer (hereafter referred to as "the Montreal Protocol"). As of 1st January 2010, there is a world-wide ban on the production of the most potent ozone depleting substances (ODS), such as chlorofluorocarbons (CFCs), halons, and carbon tetrachloride (CTC), leaving only a small quantity of those substances to be traded internationally for essential and feedstock uses.

Import and export licenses are the most effective policy option for controlling trans-boundary movements of ODS. This lesson has been learned from the experience gained through the control of CFCs and their subsequent phase-out as well as through implementing other multilateral environmental agreements (MEAs) with trade-related obligations[1]. While a licensing system on its own would not be enough to eliminate ODS smuggling[2], it gives the national authorities responsible for controlling ODS trade a mean to take stock of legitimate ODS traders, to allocate import and export permits among the authorized traders, and to weed out any unauthorized trade (intentionally or unintentionally). Monitoring trans-boundary movements of ODS is also important since it is related to the national compliance with the Montreal Protocol. The enforcement of the ODS import and export licensing system is one of a few sure ways for a country to have a good control of its progress in the phase-out of ODS, in particular when the system is coupled with a quota system that includes a ceiling[3].

Confronted with an increase of illegal trade of CFCs the Parties to the Montreal Protocol introduced the Montreal Amendment to the original Protocol requiring Parties to establish and enforce a system for licensing ODS. As of 5 October 2010, 175 out of 181 parties to the Montreal Amendment have established licensing systems.

What is iPIC?

The informal Prior Informed Consent on Trade of Ozone Depleting Substances (iPIC) is a voluntary and informal mechanism of information exchange on intended trade between the authorities in importing and exporting countries which are responsible for issuing ODS trade licenses. The advantage of informal approach over formal one is that communication between importing and reporting country can be organized on the level of National Ozone Units (NOUs), what facilitates information exchange and assists in forging informal links between staff responsible for issuing licenses or permits in importing and exporting countries.

The iPIC mechanism is aimed at assisting member countries to implement licensing systems effectively so that they do not exceed their maximum allowable annual consumption levels, as contained in phase-out strategies or prescribed by the Protocol. It was first established in 2005/2006 in Southeast Asia on pilot basis to address some issues related to the implementation of national ODS licensing systems. The NOUs and their customs counterparts in Asia were concerned about:

- Discrepancies between import and export data reported between trade partners
- Limited information exchange and cross-border collaboration
- Lack of practical and simple ways to prevent cases that would force countries into non-compliance (e.g. country quotas exceeded; arrival of shipments without permits)

1. Other Multilateral Environmental Agreements with trade related obligations include the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Cartagena Protocol on Biosafety.
2. Illicit traffic, often in border areas, simply bypasses a formal licensing process.
3. The Montreal Protocol calculates the "consumption" as "production plus imports minus exports".

Through consultations at their regional networks facilitated by UNEP, they agreed to establish iPIC in hope of creating a community of like-minded countries that are keen to enhance the effectives of their systems mutually. Since its founding, the idea has spread to other regions. Its participation is open to all Parties to the Montreal Protocol – 196 of them in total.

Unwanted ODS – An issue?

Concerns over illegal trade of ODS, mainly in CFCs, in mixtures, and in products, started appearing in the mid 1990s. The concerned Parties requested a study on the issue, which resulted in a study presented to the 22nd Meeting of the OEWG in 2002 (UNEP 2002). The findings indicated that illegal CFCs trade which was first spotted in the industrialized countries had sped to developing countries by 1999.

Various "estimates" for the total volume of illegal ODS are in circulation, but it is not possible to obtain accurate figures as seizure records – the only official data on unauthorized trade – reflect only a small part of all illegal trade. UNEP (2002) gave a range of 16,000 to 38,000 tonnes of illegal CFCs in 1995-1996, representing between 6 and 15 percent of global production.

More recent studies and operations suggest that the illegal trade of CFCs was still a large-scale issue, and a black market trade in CFCs shipped from China to countries such as Russia, Indonesia, and Myanmar may still exist (EIA 2010; per comm with NCEA, Myanmar). The one year operation "Sky Hole Patching", which was organized by the World Customs Organization (WCO) and UNEP in 2006-2007, trapped 27 seizures with 155 tonnes of ODS in 20 countries in Asia. A global operation in 2010, "Sky Hole Patching II", resulted in 21 seizures.

While some developing as well as developed countries are yet to identify an effective mean to eliminate unauthorized trade of CFCs, countries now face an emerging threat of illegal trade in HCFCs (EIA and UNEP, 2010).

Wider Acceptability of iPIC

From its humble start on a pilot basis in 2006, with support of some 20 countries and a hand-full supporters such as Sweden and the European Union (EU), iPIC has emerged as a promising mechanism to prevent unwanted ODS trade. The tool's potential as a measure to combat illegal trade in ODS was recognized by the Parties of the Montreal Protocol gathered at the 19th Meeting of the Parties in September 2007 (Decision XIX/12; see the annex for this decision and other key decisions and recommendations concerning iPIC).

Since 2007, over 50 unauthorized ODS shipments have been prevented, thanks to iPIC. During its 10-months operation in 2010, UNEP records show 96 cases of potential trades were screened and verified through the mechanism, resulting in 24 unauthorized shipments being prevented. According to the EU, since 2007 the participation in iPIC has so far prevented 900 metric tonnes[4] of unwanted ODS trade with EU Member States alone.

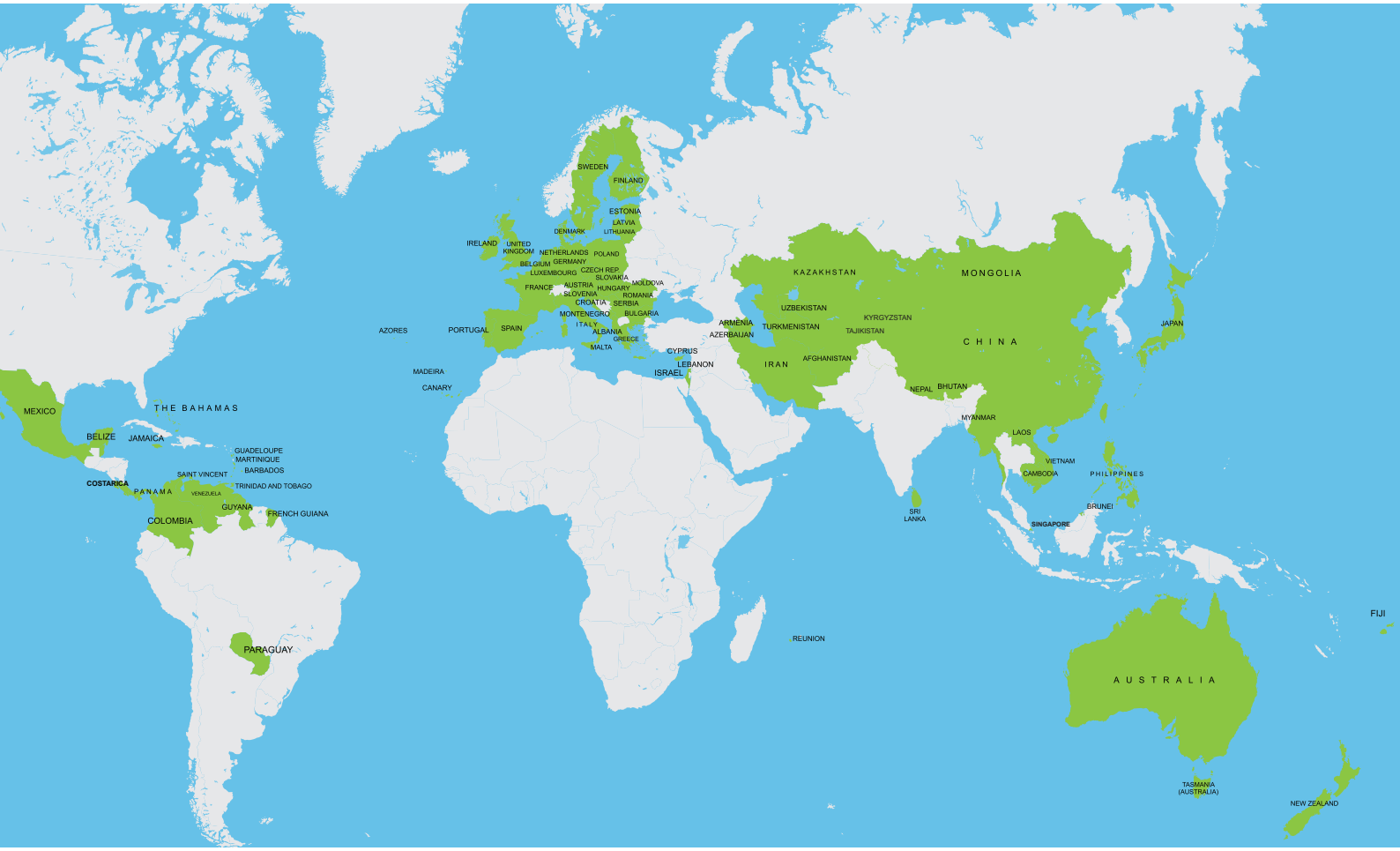
Participation in iPIC has grown steadily over the years. In 2007, the EU with its 27 Member States of started to participate in iPIC along with other 23 countries, increasing significantly the effectiveness of the mechanism. In 2008, countries from the Regional Ozone Networks for Europe & Central Asia and Latin America & the Caribbean started joining, further strengthening its outreach. In 2010, 71 countries made the voluntary decision to participate in the mechanism, enabling the mechanism to cover a significantly larger geographical coverage compared to its initial years.

In addition to its original purpose of preventing illegal and unwanted trade, iPIC has also contributed to an

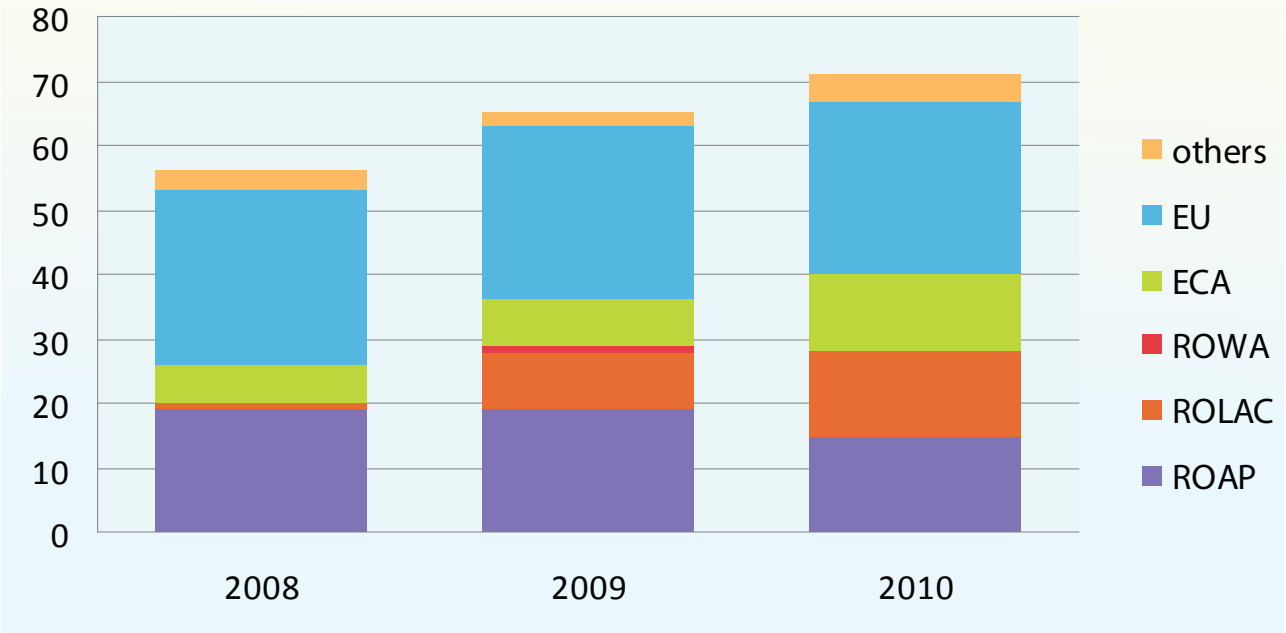
4 approximately 270 ODP tonnes

increased mutual co-operation between the licensing officers as has become a platform to exchange information and knowledge. Furthermore, it assists countries in their effective enforcement of their national licensing system, e.g. by identifying companies that are unintentionally unaware of existing obligations.

iPIC countries in 2010



Number of iPIC countries



Significant Outcomes of iPIC Cases

From South-Asia and Southeast Asia

- When issuing export licences, China uses iPIC to verify if the importing companies are registered in the destination countries. In 2009, the country was involved in investigation into 23 iPIC queries out of the total 38 raised that year. In one case from the month of April in 2010, China checked with the NOU in one Caribbean nation if the intended importer held a valid license to import 16 metric tonnes of Methyl bromide for quarantine purpose. The export request was denied when China was notified, via UNEP, by the NOU of the importing country that the intended importer had not registered to trade ODS. Investigations into export requests involving in larger quantities – for example, 525 metric tonnes of HCFC 123 (to a country in the EU) and 300 metric tonnes of HCFC-142b (a trade within Asia) – revealed errors in the information provided by the intended importers, and the shipments were allowed only after the information was corrected.

From Europe and Central Asia

- Serbia is actively participating in iPIC since 2009 and consistently checking iPIC info sheets of exporting countries before issuing import licenses for ODS. Thus it had a series of consultations with the Montreal Protocol focal points of China and the European Union. The results of these consultations were shared with others during network and enforcement network meetings as well as the meeting of the Open-Ended-Working-Group in 2010. In March 2010, Serbia informed the European Union that it had received an application for import of 13.6 metric tons of R22 (HCFC) and 1.9 metric tons of R406A (HCFC & hydrocarbon) from a local company. The ODS was originally produced in Asia but the exporter was located in the European Union. Serbia checked the iPIC info sheet of the European Union and found that the exporter was not listed. Consequently, Serbia consulted the European Union which confirmed that the exporter was indeed not registered and did not apply for an export license. Moreover, the exporter did not have stockpiles and imports of ODS into the European Union was banned. Consequently, Serbia did not issue an import licence and the company is currently under investigation. In recognition of their efforts, the focal points of Serbia, China and the European Union – among others - received gold medals under ECA Ozone Protection Award 2010 for Customs & Enforcement Officers.

ECA regional enforcement network detected illegal trade of 1,000 metric tons of allegedly recycled CFCs which iPIC could have been prevented

During discussions of the ECA enforcement network meeting in Budapest in 2009 as well as the subsequent meeting in Ashgabat and the joint meeting of the ECA and South Asia networks in Istanbul in 2010, it was confirmed that allegedly recycled CFCs were illegally imported from ODS-producing countries in Asia. In all cases, the exporting countries did not issue any export license for recycled CFCs. In some cases, it was confirmed that the exported CFC was virgin substance. In case of exports of R11 (CFC) which is mainly used in foam blowing, it is evident that such amounts were not recovered from end-of-life foam applications. Exporting countries also confirmed that certificates of quality which were presented to the importing country and which stated that it is recycled substance were falsified. The amounts of detected cases of imports allegedly recycled CFCs are significant – in total 1,108 metric tons in-between 2007 – 2009:

- 2007: 18.4 metric tons R11, 398.2 metric tons R12, 120.6 metric tons R123
- 2008: 268.2 metric tons R12 in 2008
- 2009: 266.1 metric tons R12, 36.7 metric tons R11

The application of the iPIC procedure could have prevented these cases of illegal trade through a simple phone call or email before issuing the import licenses. UNEP brought all these cases to the attention of the importing country and subsequently all licenses issued in 2010 for import of allegedly recycled ODS were withdrawn and investigations initiated. The importing country also indicated that upon completion of the required arrangements to enhance ODS import/export controls, including putting into force the required regulations, it would consider joining the iPIC initiative in order to prevent future illegal shipments / imports of ODS.

From West Asia

- In September 2010, one Israeli company applied for a license concerning import of recycled R11 and R12 (CFCs) from a company in the EU. Since the exporter was only registered for export of halons per the iPIC Information Sheet of the EU, the national focal point for the Montreal Protocol in Israel inquired the European Commission whether this potential trade was acceptable and in compliance with the Montreal Protocol provisions. The European Commission replied that the intended exporter was indeed only registered as exporter of halon, and had not requested any extension of the license to include CFCs. Consequently at the moment of the intended trade, the company was not entitled to export CFCs from the EU, regardless the quality or the application. Further, the European Commission confirmed that the export of CFCs from the EU would only be possible for feedstock uses, as process agent, or for essential laboratory uses; for all these applications; it was unlikely that non-virgin CFCs would be used. Israel rejected the application upon receiving the above information.

From Latin America and the Caribbean

- Countries in this region have become increasingly active in the application of iPIC in recent years. Among most significant iPIC cases which lead to rejection of ODS shipments to the region are 18 metric tonnes of Methyl bromide and recycled halons for servicing airplanes. Together with the EU, the region is spearheading the use of iPIC to screen ODS sales to the transport sector – sea-going vessels in particular.

How iPIC works

Countries that wish to take part in the mechanism inform UNEP of their intention to participate by sending the "iPIC Information Sheet" completed with information on the national licensing system and registered importers and exporters to UNEP's regional CAP teams. UNEP designed the initial iPIC Information Sheet, based on a questionnaire circulated to interested countries in 2002. The latest version of the template includes sections such as:

- Registered importers (names–contact details– quota)
- Registered exporters (names–contact details–quota)
- List of banned ODS and/or ODS-equipment
- Information on trade names
- Harmonised System (HS) code used in the country
- Contact persons: responsible for licensing system; or during control and investigation

The completed iPIC Information Sheets received by UNEP are shared with other iPIC countries by e-mail and CIRCABC, a password protected web platform of the European Commission. As details of a national licensing system as well as registered importers and exporters can change, countries are requested to up-date their iPIC Information Sheets on a regular basis.

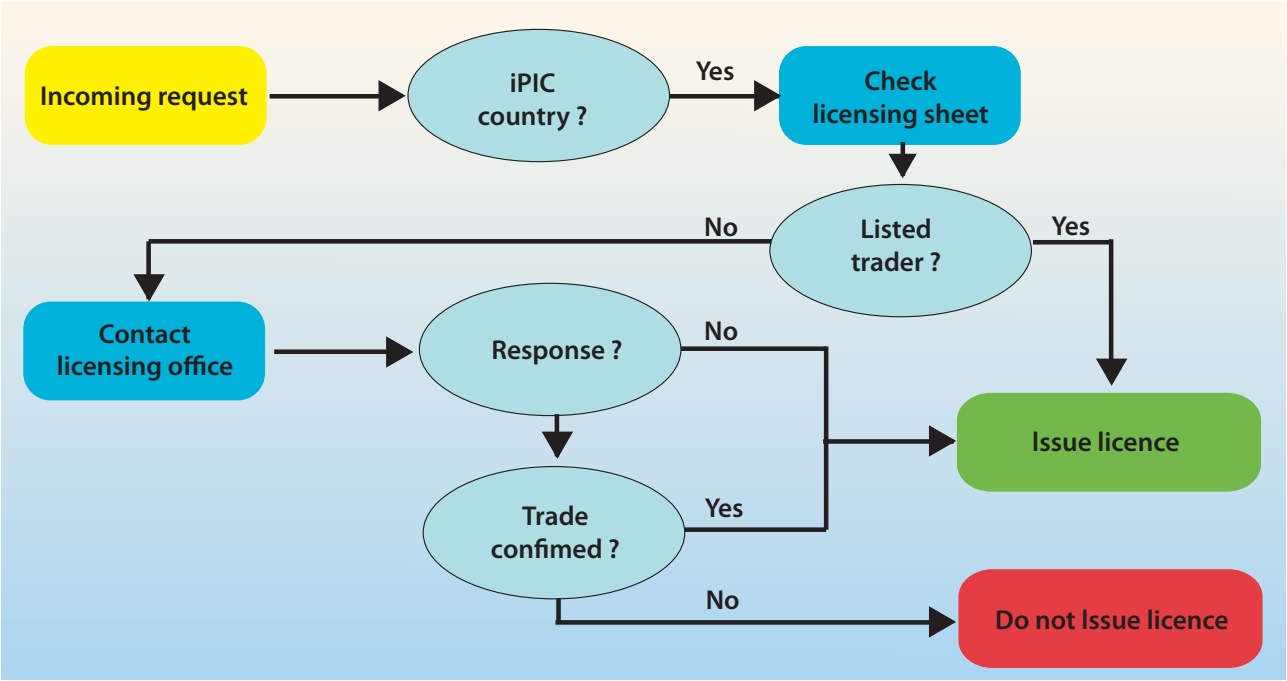
Lists of registered importers and exporters for each country facilitate the process of issuing a license as the Officer in charge of issuing trade licenses could immediately see whether the intended trade partner is registered in the other country, and whether the substance/equipment can be imported from or exported to another country.

The national authority responsible for the licence control has the possibility to verify the eligibility of a trade before approving the trade by checking the iPIC Information Sheet of the trade partner country, whether the trade partners involved appear as registered/authorized in both ends of a trade. When the national authority feels the information included the Information Sheet of the trade partner is not conclusive enough to confirm legitimacy of the trade, the authority can contact the iPIC focal point in the other country, enquiring more information. UNEP's regional CAP teams should be copied in these correspondences (called "queries") to facilitate the process.

It is important to note that unlike for formal Prior Informed Consent (PIC) systems such as in the Rotterdam or Basel Convention, in iPIC the absence of a reply is considered as agreement to the trade. This ensures that trade is not unduly delayed.

Participation in iPIC is voluntary, unlike the PIC mechanisms of some other MEAs that are mandatory. The iPIC for ODS control provides a standardized, but informal, method for targeted information exchange that would reduce the number of illegal or unwanted ODS shipments.

iPIC Procedure



Source: Prepared by A. Kiriazis, the European Union

While iPIC is relatively a simple mechanism, there are still a few requirements for countries before they could take part in it. First of all, countries that wish to participate in iPIC must have had established and implemented a national listening system for ODS import and export. As part of the licensing system, all importers and exporters need to be required to register with the national authority responsible for ODS trade control. Also, iPIC is more effective if the licensing system requires a permit for trading per single shipment of ODS. Exporters should give the details of the destinations to the national authority for ODS trade control of the importing countries.

Pros and Cons of being part of iPIC

The advantage of taking part in iPIC, and specifically for HCFCs, is that it allows both countries to monitor trade in those substances. The mechanism would give the authorities the chance to avoid illegal or unwanted shipments, resulting in a smoother implementation of the ODS phaseout plan without surprises. Also, by investigating in depth some of the trade cases that have surfaced through iPIC, NOUs have identified ODS importers that were unknown to the authorities before (e.g. methyl bromide for quarantine and pre-shipment [QPS] use in the Bahamas and R141b in Costa Rica and Panama).

There is no clear disadvantage of applying the iPIC procedure, though it definitely requires additional administrative effort in both the importing and exporting countries. Some exporting countries cite this increased administrative burden as a reason for not entering into such a mechanism. The need to update the iPIC Information Sheets on a regular basis is sometimes referred to as “not user friendly”. Plus, some non-English speaking countries find even relatively simple correspondences exchanged in iPIC, in English, burdensome.

For some countries, one of the decisive factors for non-participation in iPIC is their wish to maintain the confidentiality in trade information. Some do not want to disclose their lists importers due to legal reasons. Others

feel that, once submitted, the information contained in the iPIC Information Sheet is out of control of the NOU.

In ~~these~~ regard, the EU concluded as follows: "Based on those elements applied by the EU and despite the limitations described, the iPIC procedure has proven a useful tool for avoiding unwanted or illegal trade without creating a significant administrative burden".

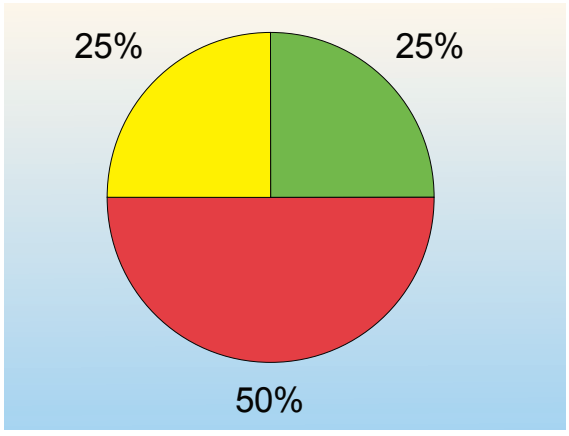
Key Statistics

As explained in the section on "How iPIC works" in this document, not all trade requests screened using iPIC are reported to UNEP. However, some insights into the performance of iPIC and also into the trend of ODS trade can be gathered by looking into basic statistics on iPIC queries over the years.

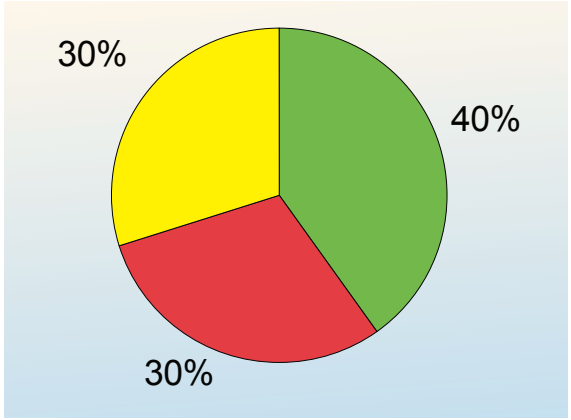
The number of trade requests screened using iPIC has risen exponentially in recent years. In 2007-2008, the number hovered around 20-24 queries per year. It increased to 38 in 2009, and in 2010, it has reached 98 queries in the end of October 2010 with two months to go still to continue counting cases for the year. The increase is believed to be closely linked with the establishment of Regional Enforcement Networks for Customs & Ozone Officers under the Montreal Protocol and active participation of key exporters of ODSs, such as the EU and China.

Between 25-46% of the requests screened by iPIC (and reported to UNEP) have been approved after a careful review using iPIC. The year 2007 marked the highest rejection rate so far of the requests, at 50% of trade requests turned down by the national authorities that are responsible for ODS trade control. Unfortunately, a significant portion of the iPIC queries each year remain unanswered, putting them in the category of "pending or unknown" outcome.

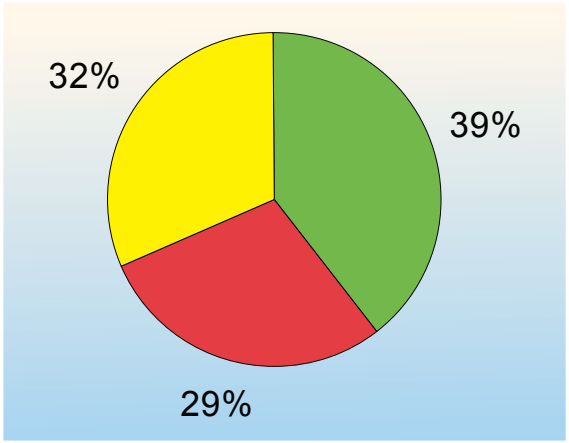
2007 – 24 queries



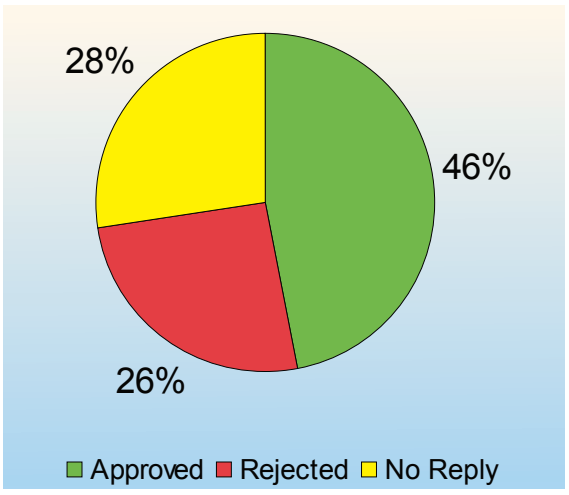
2008 – 20 queries



2009 – 38 queries



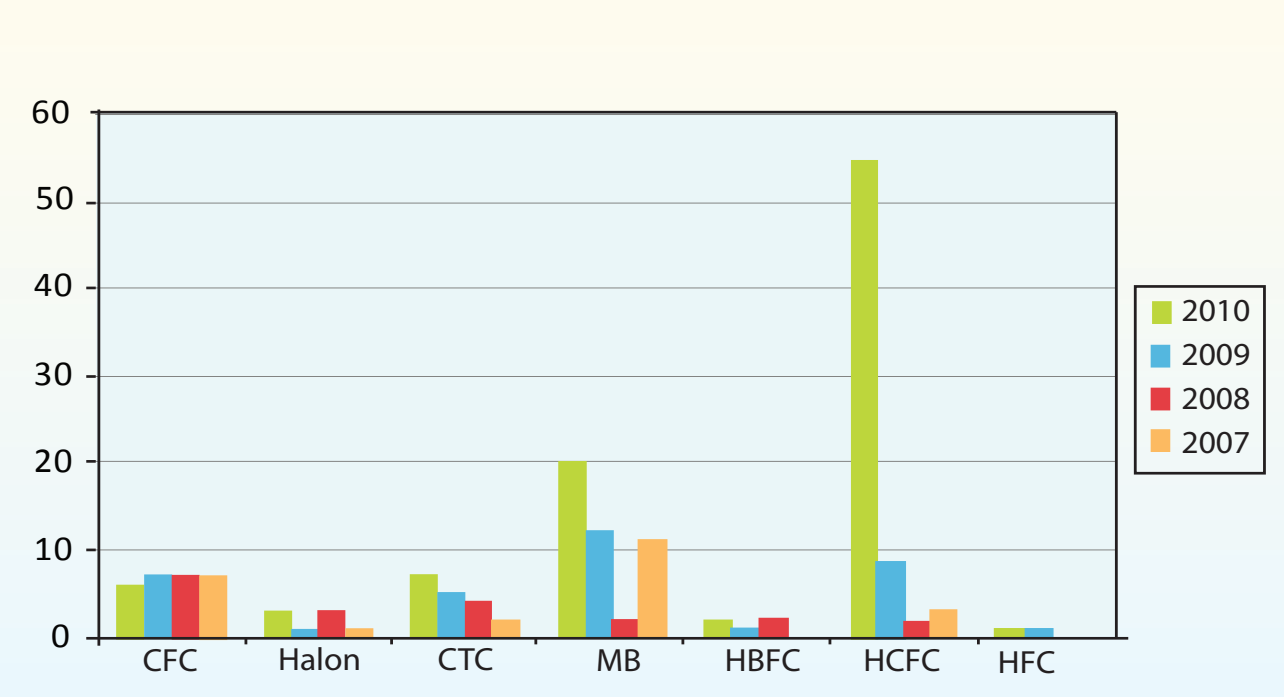
2010 – 98 queries



As to substances that have addressed in iPIC queries, CFCs and halons continue to appear though the numbers of cases notified have fluctuated over the years. Queries concerning methyl bromide and CTC trades are rising.

The number of queries concerning HCFCs (including HCFC-based blends) has increased ~~shapely~~ from 9 cases in 2009 to close to 60 cases in 2010.

Queries per Substances



Staying Dynamic

All countries participating in iPIC are encouraged to provide their ideas on how to improve the iPIC procedures so that it remains useful and relevant in supporting countries effort to enforce national licensing systems and to remain in compliance with the Montreal Protocol. Participating countries, mainly through UNEP's Regional Ozone Networks and their sister networks for regional enforcement, are looking into the following aspects to continue improving iPIC:

- A wider and more complete coverage of ODSs with iPIC - HCFCs and substances traded for QPS and laboratory and analytical use (i.e. CTC, methyl bromide). The iPIC mechanism was originally established to eliminate illegal trade in CFCs, but as ODS phase-out advances per the Montreal Protocol, countries are now required to meet other phase-down and phase-out targets, and iPIC ought assist the countries in their efforts.
- Options for tightening controls on trade in used or recycled ODSs. As false declaration as allegedly "recycled" ODSs has started to emerge, iPIC participating countries would need to know which importers and exporters hold valid permit to trade recycled ODSs.
- Countries ~~are~~ already active in iPIC wish to see more Article 5 and non-Article 5 countries taking part in the mechanism to make the mechanism more comprehensive and effective. Active and targeted recruitment might be needed to invite a few remaining ODS producing countries, and the countries in the Africa Regional Ozone Network.
- The ratification of all amendments of the Montreal Protocol by iPIC participating countries would be

extremely important in simplifying and standardizing the iPIC screening process.

- Countries could be alerted of possible implications of trade with Party/Non-party to Copenhagen, Montreal and Beijing Amendments by making the information more explicit in iPIC.
- While countries that request information on specific trade intended wishes to receive a reply on its query quickly, within 5 working days if possible. In reality, iPIC queries take an average of 7 days in the European Union and in some cases longer for queries among other countries. Also, iPIC participating countries are now requested to submit two individual contacts as iPIC national focal point in order to reduce the risk of queries remain unanswered while the main ozone focal point is away from his/her office.
- Migrating iPIC to an online, password protected web platform that would allow countries to update and share iPIC InfoSheets in real-time.

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Annex: Key Decisions and Recommendations on iPIC

Nineteenth Meeting of the Parties to the Montreal Protocol on Substances that Deplete the Ozone Layer Montreal, 17–21 September 2007 - Decision XIX/12: Preventing illegal trade in ozone-depleting substances

Acknowledging the need for action to prevent and to minimize illegal trade in controlled ozone-depleting substances and the importance of this issue in continuing discussions on the future of the Protocol,

Mindful of decision XVIII/18, which requested the Parties to provide written comments on the report entitled "ODS Tracking Feasibility Study on developing a system for monitoring the transboundary movement of controlled ozone-depleting substances between Parties" and requested the Ozone Secretariat to provide a compilation of such comments to the Nineteenth Meeting of the Parties in 2007,

Noting with appreciation the comments of the Parties on the medium- and longer-term options put forward in the tracking feasibility study,

Noting that there are other initiatives that could be used in the monitoring of the transboundary movements of controlled ozone-depleting substances between Parties,

Acknowledging that an important first step toward effective monitoring of transboundary

movements of ozone-depleting substances between Parties would be better implementation and enforcement of existing mechanisms,

Acknowledging the initiative to attempt to combat illegal trade through informal prior informed consent by countries in the South Asian and South East Asia and Pacific regions and implementation of Project Sky Hole Patching by the Regional Intelligence Liaison Office of the World Customs Organization,

Recognizing the benefits of transparency and information sharing on measures established by Parties to combat illegal trade,

Noting that action relevant to trade in ozone-depleting substances may occur in other forums such as the World Customs Organization,

1. To remind all Parties of their obligation under Article 4B of the Protocol to establish an import and export licensing system for all controlled ozone-depleting substances;

2. To urge all Parties to fully and effectively implement and actively enforce their systems for licensing the import and export of controlled ozone-depleting substances as well as recommendations contained in existing decisions of the Parties, notably decisions IX/8, XIV/7, XVII/12, XVII/16 and XVIII/18;

3. That Parties wishing to improve implementation and enforcement of their licensing systems in order to combat illegal trade more effectively may wish to consider implementing domestically on a voluntary basis the following measures:

   a. Sharing information with other Parties, such as by participating in an informal prior informed consent procedure or similar system;

   b. Establishing quantitative restrictions, for example import and/or export quotas;

   c. Establishing permits for each shipment and obliging importers and exporters to report domestically on the use of such permits;

   d. Monitoring transit movements (trans-shipments) of ozone-depleting substances, including those passing through duty-free zones, for instance by identifying each shipment with a unique consignment reference number;

   e. Banning or controlling the use of non-refillable containers;

   f. Establishing appropriate minimum requirements for labelling and documentation to assist in the monitoring of trade of ozone-depleting substances;

   g. Cross-checking trade information, including through private-public partnerships;

   h. Including any other relevant recommendations from the ozone-depleting substances tracking study;

4. To request the Ozone Secretariat to continue to collaborate with the World Customs Organization in relation to possible actions by Parties on any new amendments to the Harmonized Commodity Description and Coding System with respect to ozone-depleting substances and to report to the Meeting of the Parties on actions taken at the World Customs Organization.

First workshop of the Multilateral Environmental Agreements Regional Enforcement Network (MEA-REN), Bali, Indonesia, 8-10 November 2007

1. That, particularly the producing/exporting countries should be required to share information according to the PIC procedure (Decision MOP XVII/12).
2. In view of the recent strengthening of the control measures for HCFCs, the working group recommended the adoption of a mandatory PIC for HCFCs.
3. The quota system could be extended to export and import of HCFC.
4. Countries may also consider extending the import/export quota system to HFC.
5. Strengthening the licensing procedure by establishing permits for each shipment and obliging importers & exporters to report domestically on the use of such permits is recommended for "large" producing and/or consuming countries.

The Second Workshop of the Regional Enforcement Network on Multilateral Environmental Agreements (MEA-REN), Bangkok, Thailand, 24-26 September 2008

1. Information must be reviewed twice a year (start of the year (Feb- March) and middle of the year (31st July). To this end, UNEP will send a request to countries to inform whether any changes to the Information Sheet are to be made, and circulate the revised Information Sheets. However, countries are encouraged to inform UNEP of any revisions to be made to the Information Sheet at any time during the year.
2. A timely response is the key to the iPIC success, and is to be guaranteed by the use of phone calls and email for the fast exchange and delivery of information of registered importers and exporters among parties.
3. A confirmation of receipt should be issued on all exchanges of information. UNEP ROAP should be copied in all emails and should be informed of any difficulties in communication

The Third Workshop of the Regional Enforcement Network on Multilateral Environmental Agreements (MEA-REN), Chiangmai, Thailand, 12– 15 October 2009

1. All importers and exporters of ODSs, especially HCFCs, need to be registered. (Action taken: Countries)
2. A license be issued per single shipment of ODS. (Action taken: Countries)
3. An exporter should add the contract to the request for import license. (Action taken: Countries)
4. Exporters should give the details of the destinations. (Action taken: Countries)
5. Information of HCFCs importers and exporters should be included in Info Sheet. (Action taken: Countries)
6. When a NOU receives a query, he/she is required to acknowledge the receipt of the request as soon as possible not exceeding ten working days (Thailand considers this request later on). The time span to issue license could be discussed and agreed bilaterally. (Action taken: Countries)
7. Main contents of supporting documents for request should be translated into English. (Action taken: Countries)
8. UNEP to invite more countries, developing countries in particular, to join the iPIC mechanism. (Action taken: UNEP)
9. Tackle suspicious shipments identified by the iPIC mechanism through the use of experience from the Sky Hole Patching Project. (Action taken: Countries)
10. Exporting companies should be asked to furnish security or bank guarantee to be discharged only when authorities receive proof of receipt from importing countries. (Action taken: Countries)
11. Each country lists 3-5 people to contact on the iPIC Info Sheet in case the main focal point is absent. (Action taken: Countries)

Joint Meeting of the Regional Ozone Networks for Europe & Central Asia (ECA) and South Asia (SA), Istanbul, Turkey, 26-30 April 2010

1. NOUs are invited to submit of iPIC info sheets and, in particular, work with the major exporting countries (Russian Federation, Emirates, India, Republic of Korea, USA, etc.) to facilitate their participation.
2. iPIC info sheets should cover all controlled substances as well as traders of ODS for exempted uses. It would be useful to indicate whether the countries have destruction or reclaim facilities. Up-dates of the sheets should be possible at any time. An iPIC regime for each shipment could be considered as well.
3. Sharing of iPIC info sheets should be done through a password protected online platform. During the transition phase, countries participating in iPIC initiative should subscribe to CIRCABC in order to access the latest versions of iPIC info sheets.

The Fourth Workshop of the Regional Enforcement Network on Multilateral Environmental Agreements (MEA-REN), Beijing, China, 21-22 September 2010

1. PIC is a useful tool for ODS trade control. UNEP should circulate information on Pending/Unknown queries raised through iPIC for countries to check final outcome of the permit request.