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KIGALI AMENDMENT · MOP38 · SUDAN

Kigali Amendment at 10: 175 Parties.

Sudan Has Yet to Ratify.

Parties meet in Kigali on 2–6 November. Five of Sudan's seven neighbours have ratified; Sudan has no HFC licensing system yet.

3Bi Research Team

20 October 2026

POLICY BRIEF

The Kigali Amendment Turns 10 With 175 Parties. Sudan Should Ratify Before the Montreal Protocol Meets in Kigali.

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Ten years after the Kigali Amendment was adopted, 175 of 198 Montreal Protocol parties have ratified it. Sudan has not. As parties meet in Kigali on 2–6 November, 3Bi asks Sudan to deposit its instrument and open the door to HFC phase-down finance.

Parties to the Montreal Protocol meet in Kigali from 2 to 6 November 2026, ten years after adopting the Kigali Amendment there. Sudan is one of 23 parties that have not yet ratified it. (Illustration: 3Bi)

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The Ask

Before the Thirty-Eighth Meeting of the Parties to the Montreal Protocol (MOP38) opens in Kigali on 2 November 2026, Sudan's Government should deposit its instrument of ratification of the Kigali Amendment with the UN Secretary-General, or, if the paperwork cannot clear in time, announce a firm date for deposit when ministers meet on 5–6 November. Ratification is a procedural step that Sudan has taken four times before for earlier amendments, it costs the Treasury almost nothing, and it is the condition for full access to the Multilateral Fund money that parties will set for 2027–2029 at the same meeting.

Sudan is one of 23 parties to the Montreal Protocol, out of 198, that have not ratified the amendment, and one of six in Africa (Ozone Secretariat, all-ratifications table, accessed 20 October 2026). The amendment's tenth anniversary fell on 15 October. Its return to Kigali, the city where it was adopted, is the natural moment to close that gap.

Why Now

The Kigali Amendment, adopted on 15 October 2016, adds hydrofluorocarbons (HFCs) to the Montreal Protocol. HFCs are the refrigerant gases that replaced ozone-depleting chemicals in air conditioners and refrigerators. They do not harm the ozone layer, but many are powerful greenhouse gases. The Ozone Secretariat's tenth-anniversary briefing note says the agreed phase-down is projected to prevent more than 80 billion tonnes of CO₂-equivalent emissions by 2050 and to avoid up to 0.5°C of warming by 2100 (Ozone Secretariat, *KA@10 briefing note*, draft of 12 July 2026). GIZ Proklima, marking the anniversary, notes that pairing the phase-down with more efficient cooling equipment could roughly double those benefits (Green Cooling Initiative, 15 October 2026).

Three dates now line up. The Montreal Protocol's Implementation Committee meets in Kigali on 30–31 October, a Kigali Amendment anniversary workshop follows on 1 November, and MOP38



runs from 2 to 6 November, with a high-level segment on 5–6 November (Ozone Secretariat, MOP38 meeting page, accessed 20 October 2026). The provisional agenda includes, as item 14, the “Status of ratification of the Kigali Amendment” and, as item 4, the replenishment of the Multilateral Fund for 2027–2029 (UNEP/OzL.Pro.38/1, 10 August 2026). COP31 opens in Antalya on 9 November, three days after MOP38 closes (UNFCCC, COP31 overview schedule, accessed 20 October 2026).

The parties have asked for this formally. At MOP37, Decision XXXVII/17 noted that 169 parties had ratified and urged all others to do so (Ozone Secretariat, Decision XXXVII/17, 7 November 2025). Six more have joined since. Madagascar ratified on 10 August 2026, becoming the 174th party (International Institute of Refrigeration, 11 August 2026), and the Secretariat’s table now shows 175.

The anniversary also lands in a hot week. The African Centre of Meteorological Applications for Development (ACMAD) issued a heat-wave vigilance map on 19 October that expects a moderate heat wave in Sudan from 20 to 24 October. ACMAD’s “moderate” category means apparent temperatures of 40–44°C for two days (ACMAD, Continental Hazard Outlook, 19 October 2026). Cooling is not a luxury in Sudan, and the refrigerants that cooling depends on are what this amendment governs.

The Evidence

First, Sudan already belongs to the system; Kigali is the one piece missing. Sudan acceded to the Vienna Convention and the Montreal Protocol on 29 January 1993. It ratified the London and Copenhagen Amendments on 2 January 2002 and the Montreal and Beijing Amendments on 18 May 2004. The Kigali column of its Ozone Secretariat profile is blank (Ozone Secretariat, Sudan country profile, accessed 20 October 2026). The amendment allows deposit only by a State that has already joined the Beijing Amendment (Kigali Amendment, Article II), a condition Sudan met 22 years ago. The same profile records that Sudan has an operating licensing system for ozone-depleting substances but no HFC licensing system. In practice, the national ozone unit at the Higher Council for Environment and Natural Resources (HCENR) already runs the import controls that Kigali would extend to a new group of gases. Most of Sudan’s region has moved. Five of its seven neighbours have ratified: Chad (26 March 2019), Ethiopia (5 July 2019), Eritrea (7 February 2023), Egypt (22 August 2023) and the Central African Republic (15 October 2025). Libya and South Sudan have not. Across the Red Sea, Saudi Arabia ratified on 10 September 2025 (Ozone Secretariat, all-ratifications table, accessed 20 October 2026).

Second, ratification is the key that opens the Multilateral Fund’s HFC window, and the next three years of that money are being set in Kigali. Sudan already draws on the Fund for its ozone work. As at 26 June 2026, approvals for Sudan totalled US\$10,364,702, including its HCFC phase-out management plan implemented by UNIDO and institutional strengthening support through UNEP (Ozone Secretariat, Sudan country profile, accessed 20 October 2026). For HFCs, the Fund has worked in stages. Its first stage, enabling activities, was open to countries that had ratified or



had sent a letter stating their intent to make “best efforts to ratify the Kigali Amendment as early as possible” (Multilateral Fund, UNEP/OzL.Pro/ExCom/92/7, 27 April 2023). Under that rule Sudan received US\$150,000 for enabling activities through UNEP and UNIDO, approved at the Executive Committee’s 80th meeting (same document, Annex I). The next stage, the Kigali HFC Implementation Plan (KIP), is where the larger sums sit: 106 countries have received US\$21.6 million to prepare KIPs, and 91 countries have had first-stage KIPs approved, worth US\$171.8 million (Ozone Secretariat, *KA@10 briefing note*, 12 July 2026). The KIP door has stayed shut to non-parties. In its 2024 progress report, UNIDO wrote that KIP preparation requests for seven countries “could not be submitted due to the fact that the countries did not ratify the Kigali Amendment” (UNIDO progress report, in UNEP/OzL.Pro/ExCom/97/15, 7 November 2025). The scientific panel advising the parties estimates that the Fund needs US\$1.230–1.692 billion for 2027–2029, of which US\$664–999 million is for HFC activities (UNEP/OzL.Pro.38/2/Add.2, 25 September 2026). Its task force lists Sudan, as of 10 August 2026, among the parties “pending ratification” and models remaining non-parties on the assumption of “100% ratification by 2029”. For the later-schedule group it adds that ratifying in time is “critical to access technical and financial support in time to meet compliance targets” (TEAP Replenishment Task Force, supplementary report, September 2026). Ratifying sooner lets Sudan’s plans enter that pipeline sooner.

Third, the rules on trade and heat both favour moving early. The amendment requires each party to ban imports and exports of HFCs to and from any State that is not a party. That ban takes effect on 1 January 2033 (Kigali Amendment, Article I on Article 4 paragraphs 1 sept and 2 sept, and Article IV). The Protocol counts as a “State not party” any State that has not agreed to be bound by the control measures for a substance, and the parties may lift the ban only for a non-party they find to be in full compliance (Montreal Protocol, Article 4 paragraphs 8 and 9). With 175 parties already in, staying outside does not keep Sudan out of the phase-down. It risks making legal trade in the gases Sudan still uses harder just as cooling demand rises. The Ozone Secretariat cites International Energy Agency (IEA) analysis that minimum energy performance standards covered about 89% of global air-conditioning energy use in 2024, but only about 50% in Africa (*KA@10 briefing note*, 12 July 2026). Refrigeration, air conditioning and heat pumps produced 91% of global HFC emissions in 2020 (same source). The parties also built a heat-specific flexibility into the deal. Decision XXVIII/2, adopted in Kigali in 2016, created a high-ambient-temperature exemption for listed air-conditioning sub-sectors. It applies to parties averaging at least two months a year over ten consecutive years with a peak monthly average temperature above 35°C, and Sudan is named in its Appendix II list of eligible parties (Ozone Secretariat, Decision XXVIII/2, 15 October 2016). The same decision provides funding for enabling activities that include licensing systems, data reporting and national strategies. Hot countries were given room in the agreement; only parties can use it.



Addressing the Counter-Case

The strongest objection is that ratifying now means taking on obligations late. Sudan would be an Article 5 Group 1 party, the group whose HFC consumption was frozen from 2024 and must fall 10% from 2029, while its national ozone unit is still completing HCFC work. The Fund's own reporting shows that the second stage of Sudan's HCFC plan, for the foam sector, has had its completion date extended to December 2026 (UNEP/OzL.Pro/ExCom/97/15, 7 November 2025). That is a real constraint, and 3Bi is not claiming that ratification will be costless to implement. But the amendment's design softens the shock. Group 1 baselines are set at average HFC consumption in 2020–2022 plus 65% of each party's HCFC baseline (Kigali Amendment, Article I on Article 5 paragraph 8 qua). The amendment enters into force for a new party only on the ninetieth day after deposit (Article IV). Licensing must be in place within three months of that date (Article I on Article 4B paragraph 2 bis). The Fund exists to meet agreed incremental costs. Delay does not remove the 2033 trade ban; it only shortens the time to prepare for it.

A second objection is that Sudan has more urgent priorities than an ozone treaty amendment. We agree that ratification will not cool a single home this week. But it is one of the cheapest climate commitments available to Sudan: one legal instrument, an existing licensing system, an existing relationship with UNEP and UNIDO, and a payoff in finance, cleaner equipment and, if paired with efficiency standards, lower electricity use over time. 3Bi does not have verified figures for Sudan's current HFC consumption, and we do not estimate them here. That data gap is itself a reason to enter the KIP process, which funds exactly this survey work.

What 3Bi Recommends, Specifically

These recommendations are 3Bi's reading of the treaty texts and Fund records cited above. All are low-cost and procedural.

First, before 2 November 2026, the Government, through the Ministry of Foreign Affairs and with HCENR as the national ozone unit, should complete Sudan's domestic approval of the Kigali Amendment and deposit the instrument with the UN Secretary-General as depositary. If deposit cannot be completed in time, Sudan's delegation should use agenda item 14 or the high-level segment on 5–6 November to announce a firm deposit date before the end of 2026.

Second, in parallel, HCENR and Sudan's customs administration should prepare the HFC extension of the existing ozone licensing system, including the customs codes for HFCs and HFC blends. The aim is to have it ready to take effect within the three months the amendment allows after entry into force.

Third, before MOP38, HCENR should ask the Ozone Secretariat in writing how the high-ambient-temperature exemption in Decision XXVIII/2 applies to a party listed in Appendix II that ratifies after the original notification deadline. It should publish the answer so that importers and



installers know which air-conditioning sub-sectors may qualify.

Fourth, once the instrument is deposited, HCENR should ask UNEP and UNIDO to put a KIP preparation request for Sudan on the agenda of the Executive Committee's first meeting of 2027. The request should include an HFC consumption survey and a plan for minimum energy performance standards for air conditioners. Sudan should also consider endorsing the Global Cooling Pledge at COP31; Chad, Ethiopia, Djibouti and Kenya are among its signatories, and Sudan is not (Cool Coalition, national signatories list, accessed 20 October 2026).

Fifth, 3Bi will track the UN depositary notifications, the MOP38 report on agenda item 14, and the Executive Committee's 2027 agendas, and will publish a follow-up by mid-December 2026.

Sourcing & Contact

Primary sources: Ozone Secretariat, "All ratifications" table (accessed 20 October 2026); Ozone Secretariat, Sudan country profile, including ratification dates, licensing-system status and Multilateral Fund approvals as at 26 June 2026 (accessed 20 October 2026); Kigali Amendment to the Montreal Protocol, text adopted 15 October 2016 (Articles I, II, IV and V); Montreal Protocol, Article 4; Ozone Secretariat, Decision XXVIII/2, "Decision related to the amendment phasing down hydrofluorocarbons", including Appendix II, 15 October 2016; Ozone Secretariat, Decision XXXVII/17, "Status of ratification of the Kigali Amendment", 7 November 2025; Ozone Secretariat, MOP38 meeting page (accessed 20 October 2026); UNEP/OzL.Pro.38/1, MOP38 provisional agenda, 10 August 2026; UNEP/OzL.Pro.38/2/Add.2, note on the TEAP replenishment supplementary report, 25 September 2026; TEAP Replenishment Task Force, supplementary report on the 2027–2029 replenishment (Volume 4), including Annex 1, September 2026; Ozone Secretariat, *The Kigali Amendment: tenth anniversary briefing note* (draft 4), 12 July 2026; Multilateral Fund, UNEP/OzL.Pro/ExCom/92/7, desk study on enabling activities for HFC phase-down, 27 April 2023; Multilateral Fund, UNEP/OzL.Pro/ExCom/97/15, including the UNIDO progress report for 2024, 7 November 2025; GIZ Proklima / Green Cooling Initiative, "10 Years of Kigali Amendment", 15 October 2026; International Institute of Refrigeration, Madagascar ratification, 11 August 2026; ACMAD, Continental Hazard Outlook (heat-wave vigilance map, valid 20–24 October), 19 October 2026; Cool Coalition, Global Cooling Pledge national signatories (accessed 20 October 2026); UNFCCC, COP31 overview schedule (Antalya, 9–20 November 2026). For methodology questions or to propose a correction, contact 3Bi's Research Team via 3bisudan.org.

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