

Discussion note on the Gothenburg Protocol for the 46th WGSR

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At our 46th meeting of the WGSR we will continue the negotiations for a revised Gothenburg Protocol. To be able to conclude our negotiations in 2011 we will need to address several issues and make choices. This discussion note sketches these issues and raises questions on them for the WGSR to answer.

Technical annexes on stationary sources

EGTEI has prepared the annexes with 3 options of different level of ambition. Option 3 refers back to the Gothenburg Protocol of 1999 and the technology behind it is two decades old. Option 1 and 2 are covered by current technology (ca 2008), 1 is more ambitious and 2 is less ambitious. The WGSR will have to choose between these two options. ELVs are related to a. available techniques and to b. the emission ceilings we want to achieve. In this respect it is good to know that the ELVs for new sources will enter into force probably not before 2016 and for existing sources certainly not before 2020 (CET countries 2025). Most ELVs of option 1 can already now be met by using current BAT.

The WGSR should give guidance to the technical experts on what direction they need to go in their discussions of the TA's.

The WGSR should therefore discuss the following questions:

- 1. Should we just choose between option 1 or 2?*
- 2. Should there be a distinction between new and existing sources e.g. new=option 1 and existing=option 2?*
- 3. Should we have the highest ambition for large sources e.g. large existing sources=option 1?*

Technical annex ammonia/nitrogen (agriculture)

The TFRN has also produced a draft annex with 3 options. And although the experts do not meet at this WGSR they need guidance on the further development of the draft annex. Guidance is needed on:

- the ambition levels;
- the threshold per type of animals;
- a possible differentiation of target dates and target levels for CET countries; and
- the approach to farm size thresholds (number of animal places or the amount of manure (N) used).

For the ambition level generally one could argue that addressing most emission of NH₃ would mean that most animals need to fall under the measures of the Protocol. More than 40,000 poultry and more than 50 cattle accounts for more than 70% of the total animals/emission in the EU-27, following the data statistics of 2007. The Gothenburg threshold for pigs, 750 sows and 2000 fattening pigs, accounts for just 20% of the total number of pigs. To raise the percentage of the number of pigs falling under the Protocol measures to on average 70%, the threshold for the number of pigs on a farm need to be lowered to roughly 400 sows and 1000 fattening pigs. Just as for stationary sources one could argue that the larger the farm size the higher the level of ambition should be. One could devise a system with two ambition levels with option 1 for the largest farm sizes and option 2 for a category medium-large size (poultry: >75,000 for option 1 and 40,000-75,000 for option 2; cattle: >100 for option 1 and 50-100 for option 2; sows: > 750 for option 1 and 400-750 for option 2; fattening pigs: > 2000 for option 1 and 1000-2000 for option 2).

The WGSR should therefore discuss the following questions:

- 1. Should the threshold for pigs be lowered to account for ca 70% of the emissions/pigs?*
- 2. Would it be a good idea to set two categories of thresholds with option 1 measures for the largest farm sizes and option 2 for medium to large farm sizes?*
- 3. Would the CET countries need extra delay-time for existing animal housing?*
- 4. Should countries be allowed to choose for a system referring to the number of animal places or the amount of manure (N) used?*

Emission ceilings 2020

To be able to discuss the ambition level of the ceilings for 2020 in September at the 47th WGSR the WGSR should have information on the emission levels, costs of measures and environmental and health benefits of the following scenario's: CLE, MFR, ambition levels 1,2, 3, outcome of the discussion above on the annexes (For many countries the level of ambition of the emission ceilings is coupled to the level of ambition in the annexes). Furthermore, it would be interesting to know what level of the various environment and health end-points can be reached at low, medium and high emission reduction/costs.

Does the WGSR support the above request to the TFIAM and CIAM/IIASA?

New Protocol or amending the Gothenburg Protocol

An issue that has been postponed until now is whether to make a new Protocol or an amended one. Apart from the pros and cons of each option both options have consequences with respect to timing. If the WGSR chooses to amend the Protocol one or more countries need to submit the amendments in time to the Executive Body unless the WGSR agree to send the outcome of the negotiations to the EB and adopt the amendments there.

The WGSR should therefore discuss the following questions:

- 1. Does the WGSR propose to amend the current Protocol or a new Protocol?*
- 2. If the WGSR opts for amending the Protocol how would it see to the submission of the amendments to the EB?*