



Republic of Macedonia
Ministry of Environment
and Physical Planning

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Mr. Marco Keiner, Director Environment, Housing and Land Management Division United Nations Economic Commission for Europe

Ms. Albena Karadjova, Secretary to the Convention on Long-range Transboundary Air Pollution, United Nations Economic Commission for Europe
Environment, Housing and Land Management Division

Address: Bureau C-407, Palais des Nations
City-1211 Geneva 10
State - Switzerland

Subject: Submission of adjustment of the Annex 2 - to the 1994 Oslo protocol on further reduction of sulphur emissions

Dear Ms. Karadjova and Mr. Keiner,

In 2010, the Republic of Macedonia ratified the total of eight Protocols to the Convention on Long-range Transboundary Air Pollution (CLRTAP). The adjustment to Annex II to the current Protocol has not been submitted until now because of several reasons stated below:

Republic of Macedonia submitted adjustment to the Gothenburg protocol in September 2011. At the EMEP SB 36th session it was suggested that we need to make sure that the values for 2010 are lower than those for the baseline year and that we need to explain the profound inconsistencies among officially reported data, the data in Note Verbal, the GAINS outputs and the proposed ceilings for 2010. In this direction we were already working on updating the 1990 emission data and correcting 2010 emission ceiling for SO₂ within the Annex II of the Gothenburg protocol. Bearing in mind that the identical emission figures for 1990 and 2010 are part of the 1994 sulphur protocol, we would have been able to send the figures

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after they were accepted on the next EB session in December this year.

Unfortunately, you have informed us that not submitting the Annex II figures to the present protocol until the end of August will result in the removal of the Republic of Macedonia from the list of Parties to the 1994 Sulphur Protocol. Therefore, we are sending the figures for adjustment of Annex II of the present protocol, as promised in the letter sent to the air compliance on 14.08.2013. I would like to emphasize that even with the great time constraints; we accepted the challenge and worked in parallel on both protocols and on the basic obligation requirements.

Following this, there is a need regarding the present protocol, of calculating SO₂ emissions in 1980. Please note that in 1980 we have been part of ex-Yugoslavia, meaning we were existing in a different political system and therefore face severe shortage of the required statistical data for 1980 compared to 1990 (especially in the transport sector and energy sector). Consequently, a lot of estimations were used for calculating 1980 sulphur emissions. Additionally, the major emission source, the Power plant REK Bitola, whose share in the total SO₂ emissions is above 80%, was put in the function only in 1982. The Republic of Macedonia in 1980's was importing electricity from the other republics from ex-Yugoslavia. This means that if the percentage of emission reductions for our country should be based on the sulphur emissions calculated for the year 1980 (as it is the case for most of the countries) we will have growth of the emissions instead of reduction. Taking into account that the major source of emissions started working after 1980 and due to the high uncertainty of 1980 emission data, we propose that the percentage of the emission reduction for our country to be based on the sulphur emissions calculated for the year 2000 since this data is more reliable.

Last but not least, I wish to emphasize that, since we have ratified the protocol at the end of 2010, we propose emission ceiling only for 2010 (a figure which is now in compliance with IIASA proposal). Once again, we would like to explain that the lower reported SO₂ emissions for 2010 of 83 kt is only because of the lower quantity of used solid fuel due to the repair work on one block of the power plant and its partial operation in that year. On the other hand, following the trend of reported SO₂ national emission over the last

10 years (which are based on emission measurements) are confident that that the emission ceiling for SO₂ should be 110 kt.

As for the 2000 and 2005 emissions, we propose that the reported numbers should be taken into account, since we cannot propose emission ceilings for these past years.

Finally, we like to stress that the Republic of Macedonia is committed to comply with the protocol obligations, even though we are small country in development facing barriers due to the limited human and financial resources. Therefore, we will require more time compared to other EU member countries for fulfilling our obligations to the protocols.

Since we are one of the few countries that have ratified all protocols, it is important to remember that as a result of our strong desire and efforts our country has achieved significant improvement of the reported emission inventory compared to other developing countries. Therefore, we hope that the progress that we have achieved will be more recognized in the future. We believe that our way forward can be accomplished only with mutual respect and understanding.

I hope that you will take into account the explanations given above, bearing in mind that we have put all our efforts to prepare this adjustment according to article 11 paragraph 1 of the 1994 sulphur protocol and that you will accept our proposal.

In this regard, please refer to the Addendum, which contains the proposal for an adjustment to annex II to the present Protocol to add our country name, together with our data for sulphur emission levels for the year 1980, 1990, 2005 and 2000 as a baseline year, as well as sulphur emission ceilings for the year 2010 and percentage emission reductions based on the sulphur emission ceilings indicated for the year 2000.

Yours sincerely,

Minister
Abdilaqim Ademi

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Addendum:

Proposed Adjustment of the Annex 2 - to the 1994 Sulphur protocol on further reduction of sulphur emissions with figures on sulphur emission levels for the year 1980, 1990, 2005 and 2000 as a baseline year, as well as sulphur emission ceilings for the year 2010 and percentage emission reductions based on the sulphur emission ceilings indicated for the year 2000 for the Republic of Macedonia.

Emission levels kt SO ₂ per year		Sulphur emission ceilings a/ kt SO ₂ per year			Percentage emission reductions (base year 2000)		
1980	1990	2000	2005	2010	2000	2005	2010
62	107	105	100	110	0	5	-5

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