

Draft Report on the Workshop to Promote the Ratification of Protocols of the UNECE Air Convention with Focus on Countries in the EECCA Region

Attendance:

- fifty-seven participants from 26 countries, with 2 industry associations, 1 environment association represented attended the workshop
- The LRTAP secretariat attended. Representatives from UNEP's Minamata Convention, OECD, European Investment Bank, and from the EU COM also were present at the workshop-

Financing:

The workshop was financed by Germany and the EU-funded project (Implementation of the UNECE Convention on Long-Range Transboundary Air Pollution (CLRTAP) – Phase II) managed by the secretariat.

Workshop Opening – Chaired by Anna Engleryd, Chair of the Executive Body of LRTAP Convention, Sweden

Anna Engleryd opened the workshop mentioning the LRTAP Convention being the oldest world-wide multilateral environmental agreement, which was established 40 years ago. Reductions of 80% of acidifying pollutants and 50% NO_x in the European part of the Convention led to positive effects in nature like halting of soil acidification and fish repopulating the lakes. Levels of other pollutants, like fine particles or ozone and nitrogen deposition, are still well above acceptable levels in wide areas. In the UNECE region, an uneven progress is noted, with EECCA countries lagging behind due to both growth and systems of energy production. The workshop shall be a platform to discuss today's challenges and how to go forward, in line with the long-term strategy of the Convention. An increased cooperation with other countries and organizations outside of the UNECE will also be important. She pointed out that a lot of progress is visible in the EECCA region with regard to, for example, reporting and monitoring, aspects which are noted and much appreciated within the Convention.

Till Spranger spoke on behalf of Germany's Federal Ministry for Environment, the host of the Workshop. He welcomed participants to this particularly important Workshop in Berlin. As member of the Policy Review Group (PRG) of the Convention, he emphasized how important the long-term strategy (LTS), for improving air quality, is, and the important role of the Convention for the governance of air pollution with regard to the use of the Best Available Techniques (BAT), the ratification of Protocols and challenges of globalization. Mr. Spranger stressed the importance of understanding that more ratifications of the LRTAP Convention Protocols are essential pre-requisites to achieve the overall aims for sustainability, including economic advantages, like an access to a level playing field in Europe and eligibility for international funding.

Session 1: Different BAT approaches in different regions of the world

The Secretariat of the Convention reported on provisions on BATs in the Protocols to the Convention and capacity-building activities in sharing information of emissions and effects of air pollution. 51 countries are Parties to the Convention, to date, and 7 protocols set emission targets. Due to a process of consolidation and updating, a series of amendments were adopted, e.g. the Protocol on Heavy Metals (amended in 2012), on Persistent Organic Pollutants (amended in 2009) and the Protocol to Abate Acidification, Eutrophication, Ground-level

Ozone (amended in 2012). To assist Parties in the implementation, several guidance documents, with reference to BAT, have been developed and an internet based regional Clearing House of Control Technologies was established (<https://tftci.citepa.org/en/clearing-house>). The website of the Task Force on Techno-Economic Issues (TFTEI), containing a large amount of information on BAT, is available in English and, partially, in Russian language. In its presentation, emphasis was given to activities aimed at raising both the political profile of the Convention and awareness among decision makers. The main topics in these activities are:

- a) workshops and meetings to improve emission reporting, inventories and projections;
- b) information sharing on BAT and other cost-effective measures and;
- c) provide support to develop national policies to overcome barriers towards ratification.

The LRTAP Convention contributes to the achievement of Sustainable Development Goals (SDGs) through commitments under the Batumi Action for Cleaner Air.

Several presentations were delivered by representatives coming from different regions of the UNECE and beyond, and international organizations, concerning their engagement in developing and applying BAT concepts.

Mr Brinkmann, EU Commission, reported on 22 years' experience to develop the Best Reference Documents (BREF), for major industrial activities in the EU. The EU BREF documents contain a very detailed description of techniques. In an evidence-based and participatory process, binding conclusions are developed. In the conclusion sections (separate documents), the requirements to be met are clearly defined (e.g. ELVs and measurement periods). The requirements apply also to existing installations, after a grace period of 4 years and permit conditions need to be checked and updated.

Ms. Hjort, OECD, informed about an ongoing project on BAT. The project compares worldwide policies on BAT or similar concepts (7 countries), approaches to establish BAT around the world and gives examples for measuring the effectiveness of BAT policies, which can be difficult since appropriate datasets are needed. Examples from countries illustrated that application of BAT leads to emission decrease, in a range between 8 and 62% and reduced health costs (Israel). Other examples from the Russian Federation, China, Korea, New Zealand, India and others were presented.

Ms Korolenko's presentation, (Russian Federation), addressed a Russian-German cooperation project on BAT, with the aim to develop reference documents for 8 industrial sectors, to educate stakeholders and disseminate information. Pilot installations were analysed and practical implementation tested to help enterprises in using BAT. The process was surveyed by experts, to check if the results were in line with Russian and EU BREFs. All materials are published online and can be used for further training purposes.

Ms. Yuchkovich, Belarus, reported on a project under the Batumi Action for Cleaner Air. Belarus intends to ratify the latest 3 Protocols, before the end of 2019, to be able to use the flexibilities allowed by the Protocols, however facing some obstacles. A cost-benefit analysis was done, but many enterprises are not ready yet, to be in compliance with the new requirements. 219 permits for emissions have been issued. The attainment of the permit will be mandatory from 2020. Authorities can use national BREFs and, in case the BREFs are not available for the specific sectors, Russian, European or American reference documents can be used.

Mr. Bhimani, India, addressed the situation in Gujarat, India. A first BREF document, for India's textile industry, was developed. A framework act on legally binding standards, for discharge of emissions (MINAS), was passed. Since, end-of-pipe solutions are often used, the ambition level is lower than the ambition level achievable applying the EU requirements. Nevertheless, the project is seen as a great success and shall be applied at national level. As challenges were mentioned, lack of experience with the BAT concept, accuracy of data, convincing stakeholder and the fact that industry was never involved before in policy making, and therefore resulting unsupportive. A detailed stepwise approach is explained in the slides.

Mr Peng, China, reported that BAT guidelines are in use since 2010 and a national permitting system is being implemented between 2016 and 2020. He gave examples from the power sector. Since 2015, ultra-low emission requirements are applied for new power plants (PP) and from 2020 for existing PP, which is very challenging. He gave an overview on applied techniques and emission limit values. In the power sector, between 2006 and 2016, the emissions were reduced, by 10% for dust, by 13% for SO₂, by 14% for NO_x (with respect the maximum value for NO_x, in 2011).

Session 2: BAT in other Conventions and Treaties

Tiziano Pignatelli, Co-Chair TFTEI, illustrated the approach to technology issues within the UN Framework Convention on Climate Change (UNFCCC) context. The development and transfer of technology to the Developing Countries is a key issue for the achievement of the ultimate objective of the Convention. In 2010, the Conference of the Parties (COP16 in Cancun), established the Technology Mechanism (TM) with the main following objective: "Develop and transfer climate technologies to the Developing Countries to ultimately reduce the GHG emissions (mitigation) and adapt to the adverse effect of the Climate Change (adaptation)". The TM consists of the Technology Executive Committee (TEC) and the Climate Technology Centre & Network (CTCN), which operate under the directions of the COP. The Technology Mechanism provides technical assistance to the Developing Countries and the TEC provides recommendations to the COP on technology issues engaging financial institutions like the Global Environment Facility, the Green Climate Fund and the Standing Committee on Finance.

Eisaku Toda, UNEP Secretariat, informed about the objective of the Minamata Convention on Mercury "(...) to protect the human health and the environment from anthropogenic emissions and releases of mercury and its compounds." The Convention entered into force in 2017, with 108 Parties. Its provisions cover the entire life cycle of mercury. Emissions from coal-fired power plants, coal-fired industrial boilers, smelting and roasting processes used in the production of nonferrous metals (lead, zinc, copper and industrial gold), waste incineration facilities and cement clinker production facilities are considered. BATs and best environmental practices are illustrated in a guidance document (adopted by COP1) for consideration of the Parties, in implementing the provisions of the Convention. As BAT are concerned, primary measures like coal washing, selection or blending are considered; fluidized bed boiler during the combustion, fabric filters (FF) or electrostatic precipitators (ESP), as end of pipe techniques; conventional air pollution control systems (ESP, FGD and SCR) also contribute to mercury emission reduction. Specific International Programme (SIP) exists to financially support capacity-building and technical assistance.

Svante Bodin, (Sweden), represented the International Cryosphere Climate Initiative (ICCI). He highlighted that focus is now on PM_{2.5} and Black Carbon (BC); and sectors like Domestic Heating and Open Agricultural Burning have a large potential of emission reduction. In

particular, domestic heating is responsible for a large share of the total emission of BC, according to statistics. Guidance documents exist for a more efficient wood burning in domestic heating installations. Coal stoves are still largely used in some countries (i.e. Poland). For new appliances, the Eco-design regulation is in force in Europe, other regulations for North America are in place, although emission limits for BC are not considered, yet. A testing protocol for emissions from stoves, developed by the Nordic Council and CCAC, found that the bionic stoves are the “state of the art” for reducing BC emissions. Open burning is largely used in the agro-forestry sector, for several purposes, and contributes significantly to PM_{2.5} and BC emissions, with consequent positive health and climate impacts. Low cost abatement options/alternatives exist: conservation agriculture, mechanical removal, pasture. Reduction of open burning may be the single largest and most cost-effective mitigation option for health, food security and climate.

Angela Filipas, European Investment Bank (EIB) reported on EIB’s practices of application of BAT. The EIB is the European Union’s Bank owned by and representing the interests of the EU Member States. The Bank’s activities are organised along three product lines: lending, blending and advising. EIB principles are coming from EU policy and law, pursuing, i.e.: the integration principle, a high level of protection resulting from the application of the precautionary principle, social principles deriving from the EU Charter of Fundamental Rights and the UN Universal Declaration of Human Rights. The EIB financing action follows 10 Environmental and Social Standards, applied to both public and private sector and to all regions. In particular, the standard 2 promotes an integrated approach to prevention and control emissions into air, water, soil, and clarifies and strengthens the requirements for the application of BAT.

Session 3: BAT for Priority Sectors identified in EECCA Countries

Giovanni Cinti, Italcementi, Italy, reported that European BATs are implemented all over the EU, in industry, both for new and existing plants. The example of cement industry showed that implementation is more expensive for existing plants than for new ones, when delivering emission reduction levels according to EU’s BREF documents.

Gerald Ebertsch, Regional Authorities Bavaria, Germany, introduced an example of implementation of IED in cement plants, carried out by Bavarian authorities. He explained the way regional authorities are checking the right implementation of IED, in cement plants.

Other important issues of European BATs, such as cross-media effects and monitoring in BAT reference documents (BREF), were presented by IPPCB Seville, underlining some difficulties linked to those specific and difficult aspects of BAT’s implementation in practice, particularly on cross-media effects.

A practical example of the drafting process of European BAT documents was presented by a member of the solvent industry and demonstrated that the drafting process is long and requires a lot of competences from experts, from both industry and national authorities. But it showed that, even if many long technical meetings are necessary to come to a final result, the drafting process is operational and is a real positive outcome of a fruitful discussion between industry and administration.

The work carried out on a code of good practice for solid fuel burning in small combustion installations was presented by the co-chair of TFTEI and it appears to be particularly and potentially relevant for EECCA countries. It is now clearly obvious that this work is close to

the end and full endorsement is expected very soon, with the final adoption by the Executive Body, at the end of 2019.

Session 4: Modelling, Monitoring, Reporting

Laurence Rouil, France, introduced the session and emphasized how science and policy influence each other, in this case.

By demonstrating harmful effects and knowledge of physical-chemical processes, requirements for monitoring, reporting of pollutants and reduction commitments can be made. The reported data can show trends and patterns of air pollution and indicate further or new problems. This will make it possible to revise and improve legislation, on a scientific basis, and to adapt strategies to the new scientific questions and, eventually, set new priorities.

Oleg Travnikov, MSC-East, informed that data from the monitoring networks and emission reporting allow the assessment of the pollution levels in the EMEP region. He gave an example for cadmium, but, unfortunately, no EMEP measuring data for Cd is available, from the EECCA region. However, more and more countries are reporting national emissions data. Therefore, it is possible to update the HM and POP pollution data, annually, (concentration / deposition maps, transboundary transport, trends of pollution levels). If sufficient national data are available (high-resolution national emission data, national measurements and participation of national experts in the analysis), a country-scale pollution assessment can also be carried out. The example of Belarus was presented.

Wenche Aas, Chemical Coordinating Centre (CCC), Norway, gave an insight on monitoring of long-range transported air pollution. EMEP is the first Protocol signed of the Air Convention, today including 42 Parties. Due to significant improvements over the last decades, the average life expectancy increased by one year, in Europe, but big challenges still exist with regard to human health, biodiversity, eutrophication and others. A new monitoring strategy shall be revised in 2019, leading to better data quality and understanding of atmospheric processes and sources of pollution. So far, only a few EECCA countries have EMEP measurement sites installed and report the related data. Since the EECCA region is an area characterized by high emissions and little monitoring, the EECCA countries are encouraged to take part in EMEP activities. Financial support for measuring sites is available and training and capacity building are arranged regularly.

Nadine Allemand, TFTEI, CITEPA (France), introduced the newest developments of the application of TFTEI Cost Methodology. The developed tool to calculate costs of pollution abatement for single installations, called ERICCa, can be applied in different industry sectors. Examples for the use of solvents in surface treatment were given, for car coating installations and the packaging and printing sectors. At the moment, TFTEI is working on the application of the tool in the cement and aluminium industry.

Tiziano Pignatelli, TFTEI (Italy), informed about the request of the EB to produce a report, together with TFIAM, on Costs of Inaction, where inaction is defined as no additional action than current policy. Relevant documents are available, e.g. a damage cost model developed by Finland and an OECD study on the economic consequences of outdoor air pollution (2016). The OECD study provides a comprehensive assessment of the economic consequences in the coming decades, up to 2060. The consequences would include rising emission levels of pollutants, like PM_{2.5} and Ozone, leading to increased premature deaths, especially in densely populated areas, like India and China. The health care cost and the welfare costs would increase immensely.

Session 5: Activities in the EECCA Region to Facilitate the Implementation of BAT

The Session was devoted to discussing the current state-of-the-art in BAT development in countries of Eastern Europe, the Caucasus and Central Asia (EECCA) and experience that can be readily transferred and applied across this UNECE sub-region. Key-note presentations were focused on:

- a) the on-going reform of the environmental regulatory framework in the Russian Federation, based on BAT approach;
- b) recently introduced novelties into the national legislation of Belarus, largely embedding requirements of the Gothenburg protocol, particularly, with regard to solvent application and related VOC emissions; and
- c) the experience of Bulgaria in its transition towards the adoption of the IPPC directive under the EU membership, as well as, ratification and implementation of the Gothenburg Protocol, since 2005.

Victoria Ventchikowa, Russian Federation, reported that, since the 2016 Berlin workshop, 51 national BATs Reference documents (Informatsionno-Tekhnicheskie Spravochniki) had been developed by the Russian BAT Bureau, in consultation with industries and formally adopted, for use in the Russian Federation. The nation-wide pilot phase for integrated environmental permitting (IEPs) started in 2019, potentially covering more than 300 major polluters. These enterprises, representing most of the industrial sectors, from power generation and metallurgy to pulp and paper production, have to apply and get IEPs from state authorities, going through a verification process and finally adopting plans, for BAT implementation, by 2022. The rest of the industrial entities will have to go through the procedure by 2025. A number of economic incentives and penalties are being introduced into the national legislation, in order to further motivate the industry to improve their environmental performances. Full implementation of the reform is expected by mid-2030s.

Andrej Pilipchuk, Belarus, informed that Belarus has been gradually moving towards comprehensive introduction of the BAT concept into the national legal framework, since 2008. A number of decrees embedding “best available techniques and practices”, including the Water Code, the Law on Ozone layer protection, as well as, administrative bylaws and business-oriented ordinances have been adopted, since then. In parallel, on a voluntary basis, any legal entity had an option of applying, for a review of a particular technology/technique being in use, for verification against the national BAT criteria. By 2018, state authorities issued 48 verification resolutions across most of the industrial sectors present in the country. Furthermore, in 2018 a number of the Gothenburg Protocol provisions were directly transposed into the national environmental legislation, in advance of the decision to ratify the Protocol by the end of 2019.

Ivan Angelov, Bulgaria, introduced the Bulgarian approach to BAT and IPPC Permitting which is streamlined with the EU legislation and methodologies. On the way towards the integration with the existing EU requirements, Bulgarian laws and regulatory practices have gone through a major reform. Gradual preparation to this change made it possible to adapt to the new requirements on BAT, ELVs and IPPC permits, for most of the sectors and individual plants. Key lessons learned from Bulgarian experience include an early review of the sectors existing in the country against requirements of sectoral BREFs, either EU-developed or equivalents available in the region, especially for newly designed and constructed plants; focusing on key polluters, in terms of their integrated impact; and be ready to adjust and fine-tune particular requirements, in the process of early implementation.

In order to make a snapshot of the current situation in the EECCA region regarding steps towards ratification of the Gothenburg Protocol, as well as BAT/ELV and integrated permitting, the TFTEI Secretariat developed a short questionnaire. The summary of 8 responses received suggested that, at least two countries have been making concrete steps towards the ratification of the Gothenburg Protocol, by 2021 at latest, subject to validity of the transition flexibility mechanisms. The majority of countries has been involved in ongoing development of national legislation addressing air quality management, introducing new or updating national standards and ELVs, promoting BATs (national equivalents of EU-adopted approaches) with various timeframes covering, as long as, 2035. Many obstacles remain, however, including high cost of BAT implementation, need for substantial modernization of large industrial sectors, lack of expert capacity, and need for further legislative framework development.

The session was concluded by three short national overviews delivered by Georgia, Kazakhstan and Ukraine.

All three countries are moving forward with their environmental policies and practices related to BAT and ELV adoption, as well as, ratification of the Convention's three most recent protocols.

Georgia is a forerunner with its "optimal scenario" to conclude ratification activities, for the three protocols, by the end of 2021, implement the integrated permitting by 2021, and BAT – by 2026.

Kazakhstan is moving at its own pace, with the current review of the national industry and identification of some 400 enterprises, across all the sectors, that shall be subject to future BAT regulation and implementation. Economic incentives and timeframe for BAT implementation are currently under consideration, at government level.

The Ukraine is going through an update and review of the national environmental legal framework, in order to increase efficiency of the existing mechanisms, requiring implementation of BAT and full compliance with integrated environmental permitting. In particular, in 2019, a national law on the Environmental Policy Framework (strategy) of Ukraine, has been adopted, until 2030. Key aims of the strategy include implementation of the Permitting system in line with the EU IPPC Directive (2010/75/EC), as amended, and promotion of the ecosystem approach in the administrative and industrial policies for improvement and streamlining the state integrated environmental management.

Round Table Discussion

The last item on the agenda was a round table discussion, chaired by Alexander Romanov (Russian Federation) and Ivan Angelov (Bulgaria).

They started with raising several questions addressing BAT, in the EECCA-countries:

1. What have EECCA countries done to make further progress in implementing BAT and ratification of Protocols?
2. What are the mechanisms to be used?
3. How can the Convention help the EECCA region? How do BATs and Protocols help the countries?
4. What could be future solutions?

5. What could be additional options for transitional arrangements?

The chairs made clear, that many steps forward are already made, but regarding the ratification of the protocols, there are many more steps to go. All countries should consider ratifying the protocols and benefit from the transitional conditions, expiring by the end of the year 2019. They encouraged the audience to think of mechanisms and forms of derogations to make the ratification easier for the EECCA-countries. Therefore, there is the need to think about a step by step solutions, contrary to the current mechanism which requires the ratification of a protocol in one single step.

In addition to raising the questions and focusing on the ratification of the three latest protocols, Alexander Romanov addressed the benefits of the current approach. With including the industry the improvements of air-quality, life, environment and health are the co-benefits. A joint protocol must therefore address the different economic situations of the different countries around the world.

For the further discussion the Chatham House rules applied. Therefore no names are used in the further report.

One EECCA representative stated that without flexible conditions and more time available the ratification of the Gothenburg Protocol is not possible. But even without, they are willing to continue their effort towards the ratification of the protocol, although they will not be able to sign it. For these efforts, European experts are needed to analyse the current situation and to explain certain points. For this analyses financial support is needed. Not every requirement in the Protocol is understood. Two specific fields of action are named:

- Especially the NO_x-emissions of large combustion plants (LCP) prevents the countries from ratifying. But this issue will improve soon. Because of a new nuclear power plant entering into service this year, a minor number of LCPs, using conventional fuels, will be operating.
- The measures for volatile organic compounds (VOC) and how to calculate the load in the emission flow are another major problem. Firstly, manufacturers cannot comply with the norms. Especially emissions coming from the usage of glue are a problem. New flue gas treatment, especially in smaller enterprises, is needed. Secondly, when it comes to solvent management, there are many questions about the application of rules (e.g. solvent management plans) and how to apply them, in practice. Major problems are with the catalogue of substances that need to be checked. In the old regulation, only 50 substances were listed, now, 140 substances are included. In addition, there is a lack of equipment for measurements and known methods of measuring main parameters like for example, the total organic carbon.

The clear statement was welcomed. For the requested extension of flexibility, concrete proposals are necessary, along with a timeline, in which steps are achievable by the EECCA countries. This would be really helpful and necessary to be brought to the attention of the WGSR. Also other EECCA countries mentioned to be willing to ratify the protocols. The ratification, if achieved in 2019, would benefit from five to fifteen years flexibility, to implement the requirements. WGSR needs to be informed on which protocol's provisions are posing difficulties (estimated in about 20%)

A participant stated that at least three EECCA countries could be able to ratify one or more protocols, in the near future, and before 2022. Flexible conditions would facilitate the process, e.g. national action plans, with mechanisms to reduce aggregated emissions.

Several participants addressed the issue, for countries, to have consultations regarding the ratification process and the implementation of a new legislation, or technical measures. Establishing an advisory board, offering help, through questions/answers before and after the ratification of the protocols, would be welcomed. This proposal was supported by a TFTEI representative. He proposed an advisory committee with the main task of answering questions, at all times, and explaining details on techniques. Furthermore, workshops could be organized on specific technical issues, for example regarding solvents and refineries. These tasks could be performed by TFTEI, for which, however, further financial resources would be needed.

A step by step ratification was also proposed. According to this new approach, for instance, the ratification annex by annex of each single protocol, would be highly appreciated by the EECCA-countries.

A representative of a Party to the GP, emphasized the advantages of ratification of the protocols, e.g. better environment quality but also better access to the international markets. Standards are important in the production of goods. Moreover, the ratification shows globally, that the country is committed to introduce changes and documents the related progress achieved. Quite soon, new negotiations of the revised GP are expected to start, due to its possible entry into force. The EECCA countries are invited to be active part of these negotiations and propose their suggestions.

One of the chairs claimed that generally more time milestones are needed to set up a timeline. In several EECCA countries, the preservation of the environment is often considered a less important issues and can be easily overtaken by economic considerations. Having fixed dates and milestones, could make easier bringing this topic on the agenda of the governments

Other experts expressed their will to work towards the ratification of the protocols. Regarding the emission reduction, in general, the protection of the environment, a lot needs to be done. EECCA countries still need to investigate what should be the next tasks and steps. Big tasks are, inter alia, the accession to the protocols, establishment and improvement of inventories and improved legislation. To solve these tasks, experts and technical support, from neighbouring countries in a similar position or from abroad, could be greatly beneficial.

As a final statement, from one of the chairs, it was recognized that a lot of examples for improvement of air quality have been provided, in comparison with the previous Berlin workshop, in 2016, while other issues, like i.e. emissions from the transport and fuel sectors are also very important and need to be addressed, as well. A lot of practical suggestions have been heard, at the current workshop. It is important for the EECCA countries to actively participate in the negotiations.

Recommendations and proposals of the workshop

- EECCA countries need further flexibility options to access protocols, after the end of 2019. They should propose derogations and simplifications that make the ratification of the Protocols easier for them. It is important to communicate among themselves and with other parties to find practicable solutions, similar and in addition to the flexibility mechanism already existing.
- There is the need for discussion regarding ratification of protocols as a package or in a “step-by-step” solution.

- Flexibilities could be applied in a differentiated way for each country, i.e. starting with a statement of the country applying for flexibility for a certain period (e.g. 5 to 15 years) instead of the fixed same deadlines for all the countries. .
- A time line with fixed mile stones could be helpful to bring the Gothenburg Protocol onto the agenda of all the EECCA region's countries.
- In the EECCA countries action plans, a mechanism to reduce pollution with aggregated emissions, could be considered and developed, assumed that this kind of mechanism is acceptable.
- Ratification and implementation of the protocols are a significant decision for the environment ministries. Therefore, it is quite important the governments have a clear and complete understanding of the protocols. Assigned experts could be involved for consultation assistance, within the ratification process of the protocols. An advisory board is proposed to be established, with the task of answering the coming questions of clarification, before and after the ratification of the protocols.
- Technical workshops on specific sectors, e.g. solvents or refineries, could be helpful in facilitating the ratification of the GP. The assignment of this task to TFTEI is one possible option which, however, would imply the need of additional financial resources.
- Regarding the specific topics of VOC and solvents, further assistance is needed. The development of a new and additional guidance document, on how to apply the rules and how to perform measurements, properly, is proposed. Another possible action is the organization of an ad hoc workshop, on specific technical questions on VOC measurements and calculations.