

Gap-analysis of national air quality management policy and regulatory framework

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Task

Analyze the gaps in national policies and legislation in the field of air quality assessment and management, assessing the sufficiency of the current legislation for ratification and implementation of the key protocols to the Convention and European standards and providing recommendations on possible adjustments to fulfil the requirements.

Gap assessment – Heavy Metals Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Reduce emissions of Cd, Pb and Hg	Directive 2004/107/EC on As, Cd, Hg, Ni and PAH in ambient air	Ratification of Minamata Convention	Actions required	<i>[See activities below]</i>
Apply BAT and ELVs to each stationary source	Directive 2004/107/EC and Directive 2010/75/EU on industrial emissions	Legislation includes definition of “green technologies”, “low waste technologies” etc., but not BATs. ELVs for stationary sources available, but not associated with BATs.	Actions required	<ol style="list-style-type: none"> 1) Development and introduction of the integrated permitting system (2024) 2) Monitoring of the functionality of the earlier introduced integrated permitting system (2031)
Apply product control measures (limiting Pb in petrol and Hg in batteries)	Directive 2004/107/EC	<p>Standard AZS 388-2011 "Motor fuel. Unleaded petrol. Technical specifications" – applies to vehicles with engines running on unleaded petrol (gasoline Euro-92, Premium Euro-95, Euro Super-98).</p> <p>Planned: Introduction of fuel quality standards equivalent to the EU requirements (Directive 98/70/EC)</p>	Partially covered → <i>in progress</i>	<ol style="list-style-type: none"> 1) Develop and implement amendments to the existing product standards (2022) 2) Develop legal act defining maximum concentration of mercury in alkaline manganese batteries (2021)

Gap assessment – Heavy Metals Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Consider applying management measures to other products containing HM	Directive 2004/107/EC	UNEP initiative that supports the development and implementation of legislation for limitation of Pb in paint.	<i>Actions required</i>	Investigate the potential for introduction of measures aimed at control of Hg content in products – assessment of the current situation and investigation of potential for introduction of regulatory or voluntary measures (2024)
Develop and maintain emission inventories for Cd, Pb and Hg		Submission of NFRs and IIRs under CLRTAP. However, additional improvements should be implemented to facilitate full compliance with the requirements.	<i>Generally covered, but improvements are needed</i>	Improvement of the detailed emission inventory including information on the past and present levels of emissions based on higher level methodologies stipulated in the Protocols (2022)

Gap assessment – POPs Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Eliminate production and/or use of certain specified substances in Annex I		Under development: National Action plan on the implementation of Stockholm Convention	<i>In progress → actions required</i>	Develop legal acts banning and restricting use of certain types of POPs (2022)
Restrict the use of specific substances listed in Annex II		Under development: National Action plan on the implementation of Stockholm Convention	<i>In progress → actions required</i>	Develop legal acts banning and restricting use of certain types of POPs (2022)
Develop strategies for identifying articles still in use and wastes containing certain substances, and take appropriate measures		Under development: National Action plan on the implementation of Stockholm Convention	<i>In progress</i>	

Gap assessment – POPs Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Reduce the emissions of substances by applying LVs or BATs specified in Guidance	Directive 2010/75/EU on industrial emissions (IPPC)	Legislation includes definition of “green technologies”, “low waste technologies” etc., but not BATs. ELVs for stationary sources available, but not associated with BATs.	<i>Actions required</i>	<ol style="list-style-type: none"> 1) Development and introduction of the integrated permitting system (2024) 2) Monitoring of the functionality of the earlier introduced integrated permitting system (2031)
Develop and maintain emission inventories for PAHs, PCDD/F, HCB, PCBs		Submission of NFRs and IIRs under CLRTAP. However, additional improvements should be implemented to facilitate full compliance with the requirements.	<i>Generally covered, but improvements are needed</i>	Improvement of the detailed emission inventory including information on the past and present levels of emissions based on higher level methodologies stipulated in the Protocols (2022)

Gap assessment – Gothenburg Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Reduce sulphur, NOx, VOCs, NH3 and PM2.5 emissions (reduction targets)			<i>Actions required</i>	Integrate emission ceilings/emission reduction commitments in to the national legislation (2024)
Apply ELVs and BATs to new/existing stationary sources	Directive 2010/75/EU on industrial emissions (IPPC)	Legislation includes definition of “green technologies”, “low waste technologies” etc., but not BATs. ELVs for stationary sources available, but not associated with BATs.	<i>Actions required</i>	<ol style="list-style-type: none"> 1) Development and introduction of the integrated permitting system (2024) 2) Monitoring of the functionality of the earlier introduced integrated permitting system (2031)
Apply ELVs and BATs to Mobile sources		EURO-4 standard has been introduced in 2014	<i>Generally covered, but improvements are needed</i>	Development of the optimal and most efficient policies introducing emission limit values for mobile sources (2023)

Gap assessment – Gothenburg Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Motor fuel quality		AZS 380-2011 "Diesel fuel. Technical specifications." AZS 381-2011 "Euro Diesel. Technical specifications. " AZS 443-2011 "Motor fuel for medium- and low-speed diesel engines. Technical specifications" Additional: improvement of quality of fuel produced by SOCAR.	<i>Generally covered, but improvements are needed</i>	Develop and implement amendments to the existing product standards (2022)
Apply limit values for the VOC content in products	Directive 2004/42/EC on emissions of VOCs from paints, varnishes and vehicle refinishing products		<i>Actions required</i>	Assessment of potential for reduction of VOC emissions through introduction of the regulatory control for VOC content in specific products (2025)

Gap assessment – Gothenburg Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Apply specific NH ₃ control measures and BATs	Potential for synergies: Directive 91/676/EC on protection of waters from nitrates from agriculture	Law on environmentally friendly agriculture (2008)	<i>Actions required</i>	Development of the Code of Good agricultural practice or equivalent and establishment of the necessary legal framework (2024)
Emission inventory and Projection (SO ₂ , NO ₂ , VOCs, NH ₃ , and PM).		Submission of NFRs and IIRs under CLRTAP. However, additional improvements should be implemented to facilitate full compliance with the requirements.	<i>Generally covered, but improvements are needed</i>	<ol style="list-style-type: none"> 1) Improvement of detailed emission inventory incl. information on the past and present levels of emissions (2022) 2) Establishment of framework for development of emission projections (2023) 3) Enhancement of legislative, institutional and human capacities for development of yearly emission report (2023) 4) Ensure availability of human resources – 2 additional staff members (from 2020)

Gap assessment – Gothenburg Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
<p>Introduction and implementation of air quality standards (Critical levels of O₃, PM, NH₃ (Annex II); Critical loads of acidity and nutrient nitrogen; ambient concentrations and depositions of sulphur and nitrogen compounds; ambient concentrations of O₃, VOCs and PM; Estimation of exposure to O₃ and PM.)</p>	<p>Directive 2008/50/EC on ambient air quality and cleaner air for Europe</p>	<p>Currently Soviet time air quality standards are applied.</p>	<p><i>Actions required</i></p>	<p>Assessment (modelling and mapping) of Critical Loads and Levels based on available data (2025)</p>

Gap assessment – Gothenburg Protocol

Basic obligations	Linkages with EU directives	What is covered by Legislation, NAPs or other programmes	Status	Actions to be taken and planned timeline
Development and update of BATs database	Directive 2010/75/EU on industrial emissions (IPPC)		<i>Actions required</i>	Dissemination of information regarding the principles of BAT and development of the national framework of the information exchange (2023)
Apply measures to reduce emissions from waste products containing VOCs		National Solid Waste Management Strategy 2018-2022 (no VOC-containing wastes' measures)	<i>Actions required</i>	Assessment of potential options for reduction of emissions from the waste products containing VOC (2025)