

**Convention on Long-Range Transboundary Air Pollution (CLRTAP)**  
**41<sup>st</sup> session of the Executive Body (EB 41, 6-8 December 2021, Geneva/hybrid)**  
**Draft report on the review of the Protocol to Abate Acidification, Eutrophication and**  
**Ground-level Ozone, as amended in 2012 (ECE/EB.AIR/2021/4)**  
**Submission by the EU and its Member States**

30 November 2021

The EU and its Member States thank the GP review group for its work and welcome the Draft report on the review of the Protocol to Abate Acidification, Eutrophication and Ground-level Ozone, as amended in 2012.

Ahead of the discussions at EB 41, the EU and its Member States submit the following written inputs to the GP review group which we hope are of help to the GPG in their continued drafting:

- (a) Several of the sections in the report would need some language updates to more clearly explain the link to the review process of the Gothenburg Protocol. Notably chapters VIII, IX, XIII and XIV, as they are currently phrased, do not show the connection to the Gothenburg Protocol or its objectives. These links should be clarified for next report versions.
- For example, there is currently no clear link between the conclusion in paragraphs 16-17 (sectors with scope for further reduction) and the selection of sectors discussed in chapter VIII. The paragraphs in chapter VIII also have very different content, some describing randomly selected clean air measures and some describing the main pollutants emitted from that sector. It is not clear how this chapter should be understood in the specific context of evaluating the amended Gothenburg Protocol. General clean air information on e.g. reduction measures, not linked to this specific review, could be shortened or removed in order to keep the focus of the report while remaining within the word limit.
- (b) Paragraphs 25 and 27 should in the next step of the review work be updated to also take into account the updated WHO guidelines presented in September 2021.

- (c) In paragraph 46(a), we have a small proposal on clearer communication, since there is a risk that the reference to inventory adjustments may be misinterpreted. Depending on the circumstances, inventory adjustment applications may of course also be eligible in these cases, though the main recommended pathway to ensure reduction of PM<sub>2.5</sub> would normally be to adopt additional reduction measures. The language could simply be clarified, by removal of the final superfluous sentence, to avoid misunderstanding of our intentions and priorities.
- (d) Paragraph 47 refers to a description of policy implications: does this refer to the scenarios to be developed under item 1.1.3.2 of the draft workplan for 2022-2023? As item 1.1.3.2 is said to deliver in 2023, the discussion of these outcomes cannot be done within the framework of the *review phase* as implied by paragraph 47. The policy discussion on condensables cannot be completed without this scenario information.
- (e) It would be interesting to hear more details from the GP review group about the criteria to be applied for the upcoming assessment of adequacy of the emission reduction commitments, section VI(F). Will also the updated WHO guidelines be taken into account in this assessment?
- (f) The inventory adjustments are now discussed both in chapter VI(D) and chapter X. To avoid duplication and keep the text more concise and consistent, most of the text and conclusions on inventory adjustments in chapter X could be moved to section VI(D), keeping a shorter reference in chapter X to the inventory adjustments as possibly influencing Parties' willingness to ratify. This may also be a more strategic way to communicate about the inventory adjustments, given the sensitivity of the issue.
- (g) Paragraph 77 on possible recommendations on flexibility provisions to facilitate ratification is not very clear. More information is needed on the options for e.g. "operational improvements", "improved reporting and monitoring of the use of current flexibility provisions" and "new options ...that could help non-Parties overcome barriers" – an extended description of these options would be useful for the next steps of the review and to enable a constructive discussion among Parties.
- (h) In view of the ongoing transition of the energy sector with an increased use of renewable energy, the language in paragraph 99 could clarify the fact that a new energy mix with a more extensive use of for example biogas and bio-fuels will impact ammonia emissions as well as emissions of other nitrogen species, unless these side effects are targeted deliberately.

- (i) Could it be clarified whether or not the calculations referred to in paragraph 106(a) will include the sensitivity for including condensable PM emissions? The current language “may” is not fully clear. Our recommendation would be to indeed include this sensitivity into the calculations and analysis.
- (j) The calculations referred to in paragraph 106(b) should also take into account the *updated* WHO guidelines for comparison.

We also have a number of editorial suggestions (additions are marked in **bold**, deletions in ~~strikethrough~~):

- (a) Paragraph 23, last sentence seem to have missing words, e.g.: “In the EMEP region, total reduced N in air (ammonia + particulate ammonium) was reduced by 28 per cent, but the majority of sites **monitoring concentrations** in air show no declining trend for NH<sub>3</sub> (the United States of America and Canada will provide trends for NH<sub>3</sub> for the second draft of the present document).”
  - (b) There are several types of *adjustments* in the Gothenburg Protocol context. In the review report, e.g. chapter VI.D, (heading and paragraph 44) and chapter X (paragraphs 74, 75(d) and 77(a)), it should be clarified what adjustment process is referred to: adjustment of annexes (article 13) or inventory adjustments.
  - (c) The heading of chapter X should be clarified as “X. Flexibility provisions **to facilitate ratification**”
  - (d) Paragraph 101 is a duplication of information in paragraph 97, should be merged.
  - (e) There are several duplicating paragraphs on NH<sub>3</sub> and N including on reduction measures (e.g. paragraphs 64, 69, 70, 71, 102, 103), offering substantial opportunities for shortening and merging to enhance consistency of the text. Paragraphs not clearly specific to the review exercise could be reconsidered or moved into the background document with supplementary information.
  - (f) "These measures" in paragraph 105 should be clarified, e.g. “These measures **addressing NO<sub>x</sub> from soil** also reduce total N waste, with co-benefits for climate, stratospheric O<sub>3</sub> and water quality”.
-