

## Compilation of responses to the questionnaire to support the review of the flexibilities in the amended Gothenburg Protocol

The questionnaire was circulated to the focal points for the UNECE Air Convention on 8 July 2021, with responses due by 30 September 2021. Nine countries provided responses. One of these nine countries is a non-Party to the present Gothenburg Protocol.

In order to increase the number of responses from non-Parties, a shortened version of the questionnaire was sent to non-Parties on 15 November 2021, with a request to reply by 10 January 2022. This resulted in one additional response from a non-Party, however to the original questionnaire circulated on 8 July 2021.

Below a compilation of the 10 responses to the questionnaire.

Where cells or spaces in the tables below have been left blank/open, no answer has been given to that particular question.

Furthermore, one country that is not a Party to the Convention yet, provided a response to the shortened version of the questionnaire. Its response is included in the annex to this document.

### Responses to questions

1. Country / Party (national focal point)

Ten Parties to the Convention provided responses to the questionnaire. The names of these Parties have been rendered anonymous in this compilation by designating the countries as C1 to C10, except in the section specifically dedicated to Parties outside the geographical scope of EMEP, where it is clear that this section applies to Canada and the United States. Information in the answers themselves that could conceal the identity of the Party was also slightly modified.

2. Status of ratification of the amended Gothenburg Protocol: indicate 'YES' if ratified or 'expected year for ratification' or 'not known' if not yet ratified

'YES' for eight countries  
 'NOT KNOWN' for two countries

3. Contact details

Personal contact details are not disclosed.

4. General assessment of available flexibility provisions for ratification and implementation in the amended Gothenburg Protocol

4.a. Indicate to what extent you agree with each of the following statements. Scale from 1 to 5 where 5 is *highest agreement* and 1 is *no agreement*.

Statement	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10
(i) the current flexibility provisions strike the right balance in terms of the amount of flexibility, in line with the ambition and complexity level of the protocol	5	2	5		2	4	3	3	5	1
(ii) Additional flexibilities are needed (see 4.b below)	5	3	1		2	2	1	4	2	3
(iii) Different flexibilities are needed (see 4.c below)	5	4	1		2	2	4	4	1	3

(iv) No amount of flexibility would be sufficient to overcome current barriers (i.e. political, institutional, financial, regulatory, capacity) to the ratification of the amended Gothenburg Protocol (see further question 8)	1	3	N/A		5	3	2		1	4
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4.b. If agreeing with statement 4.a(ii) in part (a) above, please indicate which protocol requirements would benefit from additional flexibility. Please refer to the relevant paragraphs in the articles and annexes.

C1	N/A see comments in 4.e.
C2	In order to be an effective tool for additional ratifications, timescales for application of limit values for emissions from existing stationary sources may need to be longer than 15 years.
C3	N/A
C4	
C5	NA
C6	
C7	
C8	We are unable to be specific on what additional flexibilities are needed. However, if it can be established that additional/different flexibilities would encourage greater ratification of the protocol, we would be supportive of consideration of additional/different flexibilities.
C9	Overall, we recognize there is limited insight into the extent to which the flexibility provisions in the amended Gothenburg Protocol are considered useful, used or potentially effective, given that amended Protocol only recently entered into force less than 24 months ago, and more than half of that time has elapsed under a global pandemic. Further, we recognize that there is little or no information on the extent to which Parties make or will make use of flexibilities allowed by Articles 3.2, 3.3, and 3.7 or included in the technical annexes. That said, while we find the extended timescales for application of limit values for emissions from existing stationary sources, fuels and new mobile sources to be potentially quite helpful, we appreciate that these may need to be further extended in the future. We also recognize there is a complexity problem with the technical annexes, that may contribute to a capacity gap that acts as a barrier. We hope that the thematic session can further illuminate what solutions are necessary from a non-Party view.
C10	

4.c. If agreeing with statement 4.a(iii) in part (a) above, please indicate which protocol requirements would benefit from different flexibility and/or which flexibility provisions are superfluous. Please refer to the relevant paragraphs in the articles and annexes.

C1	N/A see comments in 4.e.
C2	Possible simplification of the technical annexes with emission limits for existing installations may be explored.
C3	N/A
C4	
C5	NA
C6	
C7	Superfluous: with the relative ceilings the possibility for adjustment of emission inventories for comparison with emission reduction commitments to assess compliance is no longer needed. Additional flexibility: the possibility to ratify in a staged approach could be added, i.e. allowing ratification substance by substance or sector by sector
C8	See above
C9	N/A
C10	

4.d. Indicate to what extent you agree with the following concluding statement. Scale from 1 to 5 where 5 is *highest agreement* and 1 is *no agreement*.

Statement	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10
Current flexibility provisions for ratification and implementation are generally considered to be useful, effective and adequate	5	2	5		2	4	2	3	5	1

4.e. Comment section to provide additional clarifications or observations.

C1	The responses to these questions have been provided based on our perspective as well as their applicability to us. The provisions in the Gothenburg Protocol specific to us were important in ensuring ratification of the Protocol, given that at the time of negotiation our domestic air quality management approach was not yet finalized. Although the flexibilities mentioned in this question are not applicable to us, our view is that they are needed in the Protocol. Having not used these flexibilities, we cannot judge their effectiveness, but they do seem appropriate for other countries.
C2	As a first step towards additional ratifications, non-parties need to identify and communicate protocol-related barriers for ratification and make specific suggestions for additional/different flexibilities for overcoming these barriers. An additional roadmap leading to ratification of the GP may improve acceptance for different/new flexibilities.
C3	
C4	Current flexibility provisions are considered too complex to increase number of ratifications or implementation by Parties
C5	
C6	
C7	Given the low ratification rate for Parties in the EECCA region, current flexibilities do not seem to be useful, effective and adequate.
C8	
C9	Reviewing the flexibilities in the amended GP, inclusive of amendments made via Decision 19/3, it is difficult to see what to propose for additional flexibility, that would not cross into differential obligations for different Parties, which we believe would not be helpful. Overall, we recognize there is limited insight into the extent to which the flexibility provisions in the amended Gothenburg Protocol in use by Parties, given that amended Protocol only recently entered into force less than 24 months ago, and more than half of that time has elapsed under a global pandemic. Those constraints notwithstanding, we generally find the diversity of current flexibility provisions for ratification and implementation likely to be useful, effective and adequate.
C10	Ratification of the protocol under consideration would require economic operators to undertake measures to modernise and reconstruct industrial facilities, with very high total costs in a pessimistic scenario.

5. Assessment of specific flexibility provisions applicable to current non-Parties (at the time of adoption of the amended Gothenburg Protocol) specifically designed to facilitate their ratification

5.a. Indicate to what extent you consider current flexibility provisions listed in the table below useful. Scale from 1 to 5 where 5 is *very useful* and 1 is *not useful*. Note that two of these four flexibility provisions expired on 31 December 2019 (article 3bis and 7.6). For article 3bis and 7.6, please respond on their usefulness for the time they were applicable.

Flexibility provision	Considered useful									
	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10
Article 3bis Flexible transitional arrangements for the implementation of limit values in annexes VI (VOC) and/or annex VIII (fuels and new mobile sources)		3			2	NA	NA		NA	1
Article 7.6 Reporting of limited emission inventories		5			2	NA	NA		NA	5
Article 13.1 Possibility to postpone the setting of emission reduction commitments for Annex II until ratification		5	N/A		1	NA	NA		NA	1
Annex VII.4 Extension of timescales for application of limit values for emissions from existing stationary sources (annexes IV, V, VI, X), fuels and new mobile sources (annex VIII) and LV for VOC content of products (annex XI)		5	5		2	NA	NA		NA	2

5.b. Comment section to provide additional clarifications or observations.

C1	
C2	In order to be an effective tool for additional ratifications, timescales for application of limit values for emissions from existing stationary sources may need to be longer than 15 years.
C3	
C4	
C5	It is very difficult for non-Party to scale on what extend current flexibilities are useful, so these are just our assumptions.
C6	
C7	We have not used any of these provisions.
C8	
C9	N/A
C10	Due to stricter requirements for VOC emissions and an unclear terminology of the VOC definition set out in the Gothenburg Protocol, it is not possible to correctly determine the technical capabilities of enterprises at present and in the future, which, in turn, does not allow an assessment of the technical re-equipment of technological processes in the industries. Our accession to the Gothenburg Protocol at present will entail technical re-equipment, re-registration of a large number of normative and technical documentation under the limited possibilities of enterprises to finance projects and the high cost of credit resources, which in the current economic conditions may be unaffordable for a number of enterprises.

6. Assessment of the main flexibility provisions for ratification and implementation available in the amended Gothenburg Protocol (e.g. did the flexibility provisions play a role in your decision to ratify, are they helpful and being used for implementation or compliance purpose, etc.?)

6.a. Mark with 'X' in table 'Key for ratification' where listed flexibility provisions played a role in your decision to ratify.

Mark with 'X' in table 'Used' where listed flexibility provisions have been used and/or are being used (either within the context of the original or the amended version of the Gothenburg Protocol).

Indicate in table 'Considered useful' to what extent you consider listed flexibility provisions useful for yourself or for another Party (for possible future use). Scale from 1 to 5 where 5 is *very useful* and 1 is *not useful*.

Flexibility provision	Key for ratification									
	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10
Article 3.2 Use of equivalent emission reduction strategies to comply with limit values for new stationary sources		X			NA					
Articles 3.2bis and 3.2ter Flexible application of limit values applicable to new stationary sources for Parties already Party to the protocol prior to the entry into force of the amended version					NA					
Article 3.3. Use of equivalent emission reduction strategies to comply with limit values for existing stationary sources		X			NA					
Article 3.3 and 3.7. Derogation to comply with limit values for existing stationary sources and VOC contents of products in case it is technically and economically not feasible					NA					
Articles 3.6 and 3.8(b) Non-mandatory application of BAT		X			NA					
Articles 3.9, 3.10 and Annex III The use of a Pollutant Emissions Management Area (PEMA) for large countries (Canada, USA, Russian federation, potentially Kazakhstan)					NA					

Article 3.11 quinquies The use of the adjustment procedure to adjust national emission totals for comparison with national emission reduction commitments to account for further developments and improvements of the reported emission inventories					NA	X				
Article 13.2 The use of the adjustment procedure to adjust emission reduction commitments to account for further developments and improvements of the reported emission inventories					NA	X				
Annex II.5. Three-year averaging of national annual emission totals to comply with applicable emission reduction commitments					NA	X				
Annexes IV, V, VI, VIII, IX, X, XI Special derogation provisions in the technical annexes (to derogate from the standard technical requirements)		X			NA	X				

Flexibility provision	Used									
	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10
Article 3.2 Use of equivalent emission reduction strategies to comply with limit values for new stationary sources		X			NA					
Articles 3.2bis and 3.2ter Flexible application of limit values applicable to new stationary sources for Parties already Party to the protocol prior to the entry into force of the amended version					NA					
Article 3.3. Use of equivalent emission reduction strategies to comply with limit values for existing stationary sources		X			NA					
Article 3.3 and 3.7. Derogation to comply with limit values for existing stationary sources and VOC contents of products in case it is technically and economically not feasible					NA					
Articles 3.6 and 3.8(b) Non-mandatory application of BAT		X			NA					
Articles 3.9, 3.10 and Annex III The use of a Pollutant Emissions Management Area (PEMA) for large countries (Canada, USA, Russian federation, potentially Kazakhstan)	X				NA				X	
Article 3.11 quinquies The use of the adjustment procedure to adjust national emission totals for comparison with national emission reduction commitments to account for further developments and improvements of the reported emission inventories				X	NA			X		
Article 13.2 The use of the adjustment procedure to adjust emission reduction commitments to account for					NA			X		

further developments and improvements of the reported emission inventories										
Annex II.5. Three-year averaging of national annual emission totals to comply with applicable emission reduction commitments					NA					
Annexes IV, V, VI, VIII, IX, X, XI Special derogation provisions in the technical annexes (to derogate from the standard technical requirements)	X	X			NA	X				

Flexibility provision	Considered useful									
	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10
Article 3.2 Use of equivalent emission reduction strategies to comply with limit values for new stationary sources	X	5	5	X	2	4			5	2
Articles 3.2bis and 3.2ter Flexible application of limit values applicable to new stationary sources for Parties already Party to the protocol prior to the entry into force of the amended version	X	5	5	X	NA	4			5	5
Article 3.3. Use of equivalent emission reduction strategies to comply with limit values for existing stationary sources	X	5	5	X	2	4			5	5
Article 3.3 and 3.7. Derogation to comply with limit values for existing stationary sources and VOC contents of products in case it is technically and economically not feasible	X	5	5	X	3	4			5	4
Articles 3.6 and 3.8(b) Non-mandatory application of BAT	X	5	4	X	3	4			5	5
Articles 3.9, 3.10 and Annex III The use of a Pollutant Emissions Management Area (PEMA) for large countries (Canada, USA, Russian federation, potentially Kazakhstan)		5			NA	4			5	1
Article 3.11 quinques The use of the adjustment procedure to adjust national emission totals for comparison with national emission reduction commitments to account for further developments and improvements of the reported emission inventories	X	5			2	5		5	3	5
Article 13.2 The use of the adjustment procedure to adjust emission reduction commitments to account for further developments and improvements of the reported emission inventories	X	4	5	X	2	5		5	3	5
Annex II.5. Three-year averaging of national annual emission totals to comply with applicable emission reduction commitments	X	5	5	X	3	5		3	3	3
Annexes IV, V, VI, VIII, IX, X, XI Special derogation provisions in the technical annexes (to derogate from the standard technical requirements)		5			2	5			3	4

6.b. Comment section to provide additional clarifications or observations (e.g. reasons why a particular provision is used/not used or considered/not considered useful).

C1	Our reduction commitments are based on our domestic air quality management approach, and so are our obligations in the technical annexes which allow us to submit its domestic measures to annexes IV, V, VI, VIII, X, XI. These measures that control emissions of NO <sub>x</sub> , SO <sub>2</sub> , VOCs and PM <sub>2.5</sub> are equivalent in ambition to the emission limit values, as appropriate.
C2	For compliance with annexes VI and XI we implemented an incentive tax on volatile organic compounds (CHF 3.-/kg emitted VOC into air) together with substance specific limit values for stationary sources. In 2016, we reported within WGSR under <i>Reporting by Parties on Strategies and Policies</i> on the incentive tax on VOC as an alternative reduction strategy according to art. 3 para. 2 and 3 GP.
C3	
C4	Annex II. 5 is consider useful but it is difficult to see how it will be implemented, in particular the reference year for defining exceptional events should be clarified. Additionally, a risk of non-compliance could appear when a year cannot be evaluated until a year later (average with the previous and the subsequent year is required).
C5	It is very difficult for non-Party to scale on what extend current flexibilities are useful, so these are just our assumptions.
C6	
C7	We have not used any of these provisions.
C8	Additionally, the ability to be assessed for compliance on the basis of fuels used in the road transport sector not fuels sold is considered a useful flexibility.
C9	<u>Articles 3.2, 3.3 and 3.7:</u> The equivalent emission reduction strategies associated with Article 3.2, 3.2bis, 3.2ter and 3.3. are non-applicable to us, as we apply the limit values specified in annexes IV part C, V part C., VI part C, and X part C, in order to bridge our air quality management systems to those used by Parties within the geographical scope of EMEP. The ELVs specified for us in the annexes are as stringent as those for the other Party outside the geographical scope of EMEP and Parties within the geographical scope of EMEP. We have not required derogation to comply with limit values for existing stationary sources and VOC contents of products associated with Articles 3.3. and 3.7. Recognizing that Informal Document 4 on Flexibilities reported that insufficient information exists to inform the extent to which these provisions (original or amended) have been used, in the absence of evidence to the contrary, we find the provision for equivalent emission reduction strategies to be potentially helpful, and are hopeful that additional information from Parties in response to this questionnaire can inform these data gaps. <u>Articles 3.6 and 3.8:</u> Articles 3.6 is non-applicable to us as we apply BAT to the mobile sources covered by annex VIII and to each stationary source covered by annexes IV, V, VI, and X. Article 3.8 it is not applicable since we do not have any obligations related to ammonia emissions. Recognizing that Informal Document 4 on Flexibilities reported that insufficient information exists to inform the extent to which these provisions (original or amended) have been used, in the absence of evidence to the contrary, we find the provision for non-mandatory BAT to be potentially helpful, and are hopeful that additional information from Parties in response to this questionnaire can inform these data gaps.
C10	The use of the Pollutant Emission Management Area (PEMA) leads to the fact that when compiling the inventory, each of our constituent entities included in the PEMA (currently 58 constituent entities located in the ETR) must be considered separately, which significantly increases the time and resource costs of preparing the inventory. Expansion of EMEP to the east has led to the fact that a number of our subjects are only partially included in PEMA, which makes it practically impossible to carry out work on assessment of pollutant emissions in these regions.

7. Section specifically dedicated to Parties outside the geographical scope of EMEP (Canada and USA)

Provide your comments or observations to specific provisions applicable to Canada and USA (i.e. with respect to articles 3.9, 3.10, 3.11, 3.11bis, footnotes to tables 1, 2, 3, 5 and 6 of Annex II, Annex III and sections B and C of Annexes IV, V, VI, VIII, X and XI).

Articles 3.9 and 3.10

These articles are still relevant. As with other countries with a total land area greater than 2 million square kilometres, Pollutant Emissions Management Areas (PEMAs) in Annex III of the amended Gothenburg Protocol are listed for the United States and Canada. We do not consider PEMAs to represent a flexibility provision, but rather reflect a practical accommodation for air quality management of large geographic areas, and recognition of where transboundary air pollution issues between the U.S. and Canada exist. The use of PEMAs, was not key to our ability or choice for ratifying the Gothenburg Protocol or the 2012 amendments to the Gothenburg Protocol. Discussions on PEMAs will be informed by discussions taking place as part of the review of the Canada-US Air Quality Agreement.

Article 3.10 ammonia exemption

This article is still relevant. At the time of negotiating the Protocol, it was determined that Canada and the US are exempt from ammonia reduction commitments because eutrophication was not a transboundary issue between Canada and the US.

Article 3.11

While the United States and Canada made use of this provision in the amended Gothenburg Protocol in 2017, we do not understand this to represent a flexibility, rather as a necessary accommodation to bridge our air quality management systems to those used by Parties within the geographical scope of EMEP. If the Convention begins discussions on amendments to the Protocol, this article may need to be updated.

Article 3.11 bis automatic incorporation into annexes

If there are future amendments made to the Gothenburg Protocol, we will want to retain this provision, in order to allow our measures to be updated to reflect potentially different commitments. The automatic incorporation would still be relevant.

Footnotes in tables 2, 3, 4, 5, 6 of Annex II

These have been used. These should be retained in any potential future amendments of the GP.

Section B in Annexes IV, V, VI, VII, VIII, X, XI

These continue to be relevant. In any potential revision of the Gothenburg Protocol, updates/revisions will be needed on the listed measures to reflect any new potential emission reduction commitments, as well as any new measures put in place since the last list was added to the Protocol.

8. Other barriers to ratifying the amended Gothenburg Protocol: addressed to current non-Parties

8.a. Scale from 1 to 5, where 5 represents a *major obstacle* and 1 represents *no obstacle*.

Barrier	C5	C10
Lack of political awareness, sense of urgency or willingness to ratify	5	2
Gaps in or lack of knowledge and/or insufficient technical staff / support / capacity	4	2
Lack of funding	5	4
Lack of regulatory frameworks for i.a. permitting and emission reporting	2	2
Institutional barriers	2	2
Technical complexity of the Protocol, the large number of requirements	4	5
Other, please specify: C5: "Socio-economic situation (especially given the negative impact of the COV19 pandemic). Implementation of several requirements of the amended Gothenburg Protocol is related to the significant investments not only by the private sector, but it will also affect the expenses of citizens (e.g. introduction of emission limits for mobile source will significantly increase the price of vehicles; emission reduction of VOCs from petrol storage and distribution is associated with high capital expenditures from companies which will lead to higher fuel prices etc.)"	5	

8.b. To what extent are your emission inventories for the 5 main pollutants (SO<sub>2</sub>, NO<sub>x</sub>, VOC, NH<sub>3</sub> and PM<sub>2.5</sub>) of sufficient quality to be able to propose meaningful emission reduction commitments upon accession to the Protocol? Please clarify.

C5 Mostly, emissions of main pollutants from key sources are estimated using Tier 1 or Tier 2 methods. There are different reasons for that. For example, emissions from stationary sources (which are the key sources for SO<sub>2</sub> and PM<sub>2.5</sub>) are available at Tier 3 method, but only for recent

limited years. Since we are obliged to report emissions from 1990 we are not able to use Tier 3 method. Same can be said for road transport emissions which is the key source of VOC and NOx emissions. We can use COPERT model for recent years, but to calculate emissions from 1990 we are forced to use Tier 1 method. Another reason is lack of activity data, e.g. we do not have statistic data on types of ovens and boilers used for wood burning. Thus, we are using Tier 1 method to calculate emissions from this category which is the key source for PM<sub>2.5</sub>. Limited statistical data is an obstacle for using higher Tier methods to calculate emissions from Agriculture sector that is the main source of NH<sub>3</sub> and key source for NOx. Taking into consideration above mentioned, we can assume that definitely quality of our emission inventory is not sufficient to be able to propose meaningful emission reduction commitments. We think that for non-Parties base year should be updated and requirement for emission inventory from 1990 should be switched to much later period (for example 2010). This will significantly increase quality of emission inventory.

- C10 Currently, the emission inventories are of insufficient quality as there are no approved methodological documents for PM<sub>2.5</sub> and PM<sub>10</sub> emission inventories in our country and they are not collected by statistical authorities on a systematic periodic basis. In addition, the transfer in 2018 of the responsibility for the formation of official statistical information on emissions of pollutants from stationary sources to the Federal Service for Supervision of Natural Resources Management has led to inconsistency in the series for individual pollutants and industries.

8.c. To what extent is the use of the year 2005 as baseline year for % reduction commitments a barrier for your ratification process (for instance because of lack of the necessary statistics for estimating emissions for historic years)? Other preferences if 2005 is considered a barrier. Please clarify.

- C5 It is a significant barrier. First of all, sufficient activity data for development of high quality emission inventory for this year is not available. Moreover, for the small country like ours which is situated in region with unstable geopolitical situation and with developing economy there are many internal and external factors that can significantly influence economic activities and consequently amount of emissions. Therefore, we think that base years for this type of countries should be later than 2005 and three-year averaging of national annual emission totals instead of one year.

- C10 Is not an obstacle. Considered to be an obstacle. We have a developing economy with two factors. On the one hand, the country is undergoing technological re-equipment, introducing more advanced technologies, which contributes to the reduction of emissions. On the other hand, due to the sanctions imposed, a policy of import substitution is actively implemented in the country, which leads to an increase in production, which, in turn, is inevitably accompanied by an increase in emissions. The result of these two opposing factors is, at best, zero emissions growth.

## Annex: response from a non-Party to the Convention

1. Country / Party (national focal point)

Non-Party to the Convention

2. Status of ratification of the amended Gothenburg Protocol: indicate 'YES' if ratified or 'expected year for ratification' or 'not known' if not yet ratified

NA

3. Contact details

Personal contact details are not disclosed.

4. General assessment of available flexibility provisions for ratification and implementation in the amended Gothenburg Protocol

4.a. Indicate to what extent you agree with each of the following statements. Scale from 1 to 5 where 5 is *highest agreement* and 1 is *no agreement*.

Current flexibility provisions for ratification and implementation are generally considered to be useful, effective and adequate	4
Additional flexibilities are needed	3
Different flexibilities are needed	5
No amount of flexibility would be sufficient to overcome current barriers (i.e. political, institutional, financial, regulatory, capacity) to the ratification of the amended Gothenburg Protocol (see further question 7)	3

4.b. Comment section to provide additional clarifications or observations.

At present, we are not a party to the Convention on Long-range Transboundary Air Pollution and consequently not a party to the Gothenburg Protocol.  
At the same time, we participate in most of the events, meetings and seminars organized by the secretariat of the Convention and are currently actively studying the feasibility of an accession to the Air Convention.  
Questions relating to the study of the advisability of accession to the Air Convention are included in the recommendations of our third Environmental Performance Review and in our national plan for environmental protection by 2030.

5. Assessment of specific flexibility provisions applicable to current non-Parties (at the time of adoption of the amended Gothenburg Protocol) specifically designed to facilitate their ratification

5.a. Indicate to what extent you consider current flexibility provisions listed in the table below useful. Scale from 1 to 5 where 5 is *very useful* and 1 is *not useful*. Note that two of these four flexibility provisions expired on 31 December 2019 (article 3bis and 7.6). For article 3bis and 7.6, please respond on their usefulness for the time they were applicable.

Article 3bis Application of flexible transitional arrangements for the implementation of limit values for VOC emissions from stationary sources (annex VI) and for fuels and new mobile sources (annex VIII)	4
Article 7.6 Reporting of limited emission inventories	5
Article 13.1 Possibility to postpone the setting of emission reduction commitments for Annex II until ratification	5
Annex VII.4 Extension of timescales for application of limit values for emissions from existing stationary sources (annexes IV, V, VI, X), fuels and new mobile sources (annex VIII) and LV for VOC content of products (annex XI)	5

5.b. Comment section to provide additional clarifications or observations.

No
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6. Assessment of the main flexibility provisions for ratification and implementation available in the amended Gothenburg Protocol. Indicate to what extent you consider current flexibility provisions listed in table below useful for yourself (for possible future use). Scale from 1 to 5 where 5 is *very useful* and 1 is *not useful*.

<p>Article 3</p> <p>Use of equivalent emission reduction strategies to comply with limit values for existing and new stationary sources.</p> <p>Derogation to comply with limit values for existing stationary sources and VOC contents of products in case it is technically and economically not feasible.</p> <p>The use of the adjustment procedure to adjust national emission totals for comparison with national emission reduction commitments to account for further developments and improvements of the reported emission inventories</p>	3
<p>Technical Annexes</p> <p>Three-year averaging of national annual emission totals to comply with applicable emission reduction commitments</p> <p>Special derogation provisions in the technical annexes (to derogate from the standard technical requirements)</p>	3

7. Barriers to ratifying the amended Gothenburg Protocol

7.a. Scale from 1 to 5, where 5 represents a *major obstacle* and 1 represents *no obstacle*.

Lack of political awareness, sense of urgency or willingness to ratify	1
Gaps in or lack of knowledge and/or insufficient technical staff / support / capacity	5
Lack of funding	5
Lack of regulatory frameworks for i.a. permitting and emission reporting	4
Institutional barriers	4
Technical complexity of the Protocol, the large number of requirements	3
Other, please specify:	

7.b. To what extent are your emission inventories for the 5 main pollutants (SO<sub>2</sub>, NO<sub>x</sub>, VOC, NH<sub>3</sub> and PM<sub>2.5</sub>) of sufficient quality to be able to propose meaningful emission reduction commitments upon accession to the Protocol? Please clarify.

No explanation
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7.c. To what extent is the use of the year 2005 as baseline year for % reduction commitments a barrier for your ratification process (for instance because of lack of the necessary statistics for estimating emissions for historic years)? Other preferences if 2005 is considered a barrier. Please clarify.

No explanation
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