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Review of the 2022 Adjustment Application

France

Expert Review Team Report

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Expert Review Team

Role	Sectors	Name	Country
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Basic checks (Step 1 and 2)	N/A	Sabine Schindlbacher	CEIP

Executive Summary

1. As mandated by Decision 2012/3 (ECE/EB.AIR/111/Add.1) of the Executive Body of the CLRTAP the nominated Expert Review Team undertook a detailed review of the adjustment application submitted by France. The review was undertaken on behalf of the EMEP Steering Body and following the guidance published in the Annex to decision 2012/12 (ECE/EB.AIR/113/Add.1) and 2014/1 (ECE/EB.Air/130) and additional Guidance provided in “Inventory adjustments in the context of emission reduction commitments (ERCs)”¹.
2. The application was reviewed by two independent sectoral experts during May and June 2022. The findings were discussed during the review week from 30 May to 06 June 2022. The conclusions and recommendations for the EMEP SB are documented in this country report.

Table ES1: Summary Information on the Submitted Application

Reasons for adjustment application (Decision 2012/3, para 6)	New emission source
Pollutant for which adjustment is applied for	NMVOG
Sector/Pollutant for which adjustment is applied for	3B and 3D
Year(s) for which inventory adjustment is applied	2005,2020
Date of notification of adjustment to the Secretariat	10.02.2022
Date of submission of supporting documentation	15.03.2022

3. The Expert Review Team reviewed and evaluated the documents submitted by France.
4. **NMVOG emissions from Manure Management (NFR 3B) and Agricultural soils (NFR 3D):** As specified in the "Technical Guidance for Emissions Inventory Adjustments under the Amended Gothenburg Protocol: Inventory adjustments in the context of Emission Reduction Commitments" (TFEIP 2022) the reference version of the EMEP/EEA Guidebook for adjustment applications under the amended Gothenburg Protocol is EMEP/EEA 2009 version (EMEP/EEA 2009). Since no default emission factors were available for NMVOG emissions from animal husbandry and manure management and agricultural soils in the EMEP/EEA 2009 Guidebook the ERT finds that these sources were not known at the time when the emission reduction commitments were set and thus constitute valid adjustments. The ERT finds that the emissions have been calculated in line with the EMEP/EEA Guidebook. Hence, the ERT is of the view that the application for adjustment meets the criteria as outlined in the Directive. The ERT therefore recommends that the EMEP Steering Body **ACCEPT** this adjustment application from France.

¹ Available at: <https://www.ceip.at/gothenburg-protocol/adjustments>

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1 Introduction and context

5. Parties may apply to adjust their inventory data or emission reduction commitments if they are (or expect to be) in non-compliance with their emission reduction targets. However, in making an adjustment application, they must demonstrate that extraordinary circumstances have given rise to revisions to their emissions estimates. These extraordinary circumstances fall into three broad categories:

- a) Emission source categories are identified that were not accounted for at the time when the emission reduction commitments were set; or
- b) For a particular source, the emission factors used to estimate emissions for the year in which emissions reduction commitments are to be attained are significantly different to those used when the emission reduction commitments were set; or
- c) The methodologies used for determining emissions from specific source categories have undergone significant changes between the time when emission reduction commitments were set and the year they are to be attained.

6. Any Party submitting an application for an adjustment to its inventory is required to notify the Convention Secretariat through the Executive Secretary by 15 February at the latest. The supporting information detailed in Decision 2012/12 must be provided (either as part of the Informative Inventory Report, or in a separate report) by 15 March of the same year.

7. As mandated by Decision 2012/12 and as amended by the Decision 2014/1 of the Executive Body of the CLRTAP, applications for adjustments that are submitted by Parties are subject to an expert review². Technical coordination and support to the review is provided by EMEP's Centre on Emission Inventories and Projections (CEIP). The members of the review team are selected from the available review experts³ that Parties have nominated to the CEIP roster of experts.

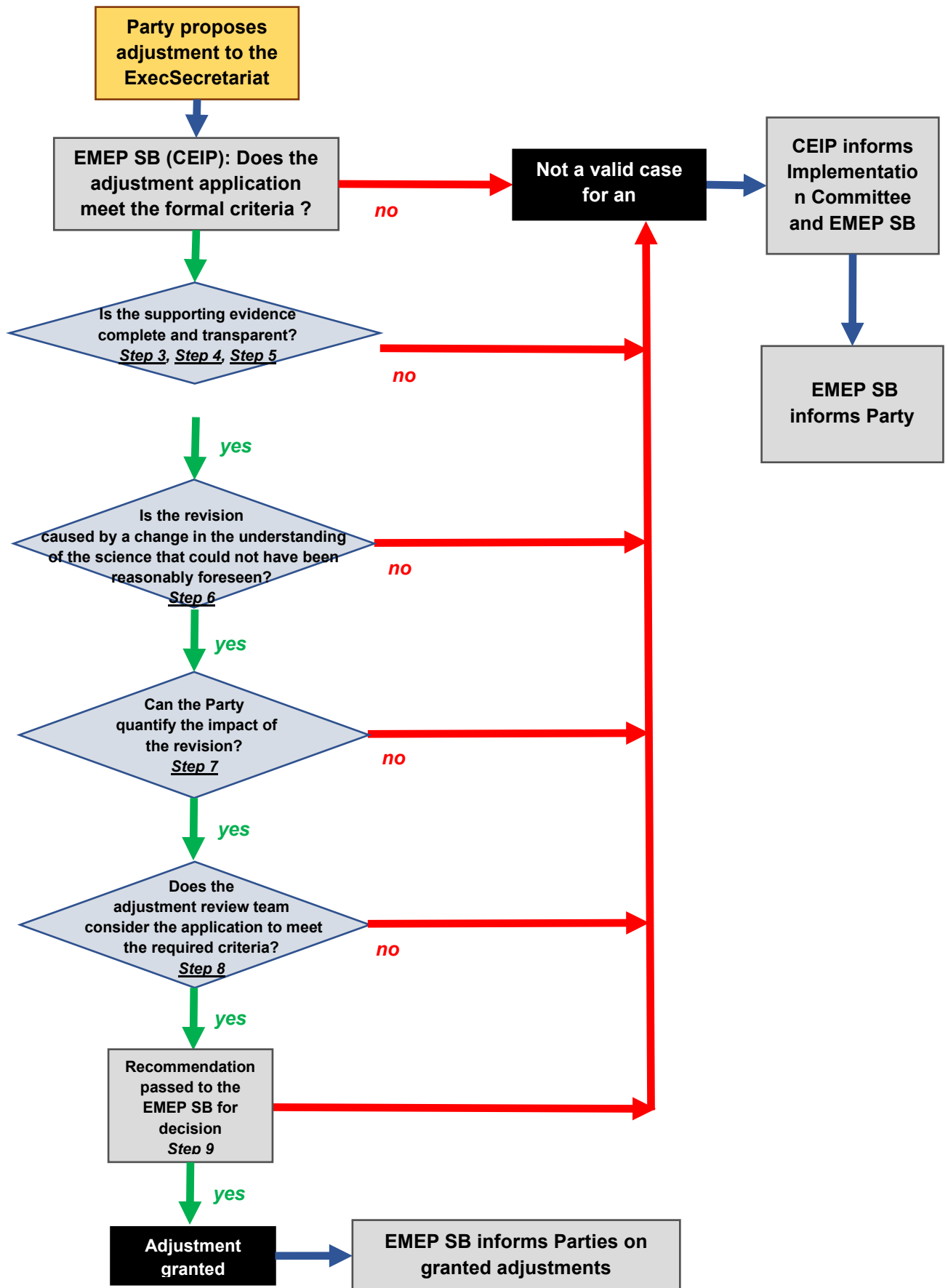
8. The Expert Review Team (ERT) undertakes a detailed technical review of the adjustment application in cooperation with the EMEP technical bodies and makes a recommendation to the EMEP Steering Body on the acceptance or rejection of the application. The EMEP Steering Body then takes its decision on any adjustment application based on the outcome of the technical assessment completed by ERT.

9. The flow diagram below outlines the different stages of the technical review. The following sections of this report are structured in the same way, and describe in detail the findings of the ERT at each of the decision gates in the process.

² The EMEP Steering Body, in conjunction with other appropriate technical bodies under EMEP, shall review the supporting documentation and assess whether the adjustment is consistent with the circumstances described in paragraph 6 of EB decision 2012/3 and the further guidance in EB decision 2012/12 as amended by EB decision 2014/1 and Technical guidance document ECE/AB.Air/130 ..

³ https://www.ceip.at/fileadmin/inhalte/ceip/3_review/0_roster_2022.pdf

Figure 1: Flow diagram/decision tree for the review of adjustment applications



2 Review of submitted new adjustments

2.1 Assessment of formal criteria

10. France notified the secretariat through the ECE Executive Secretary of its intention to apply for a new adjustment within the legal deadline on 10 February 2022. Supporting information requested by decision 2012/12 was provided as part of the Informative Inventory Report before the legal deadline of 15 March of the same year that it is being submitted for review by the EMEP Steering Body (decision 2012/12, annex, para. 1).
11. Additional information was provided during the review in response to requests from the ERT.
12. France submitted an application for emissions adjustments to NMVOC for 2020 for the following sectors:
 - (a) Manure management, 3B;
 - (b) Agricultural soils, 3D.
13. France does not comply with its NMVOC emission reduction commitment listed in Annex II of the Gothenburg Protocol, (paragraph 1 of Decision 2012/3).
14. France provided information on the impact of the adjustment to its emission inventory, and the extent to which it would reduce the current exceedance and possibly bring the Party into compliance with its emission reduction commitments for the year 2020 for NMVOC.
15. France included information on when it will meet its emission ceiling for NMVOC in the supporting documentation.
16. France indicated that without the adjustment, the ceiling for NMVOC will not be met before 2030 in the supporting documentation.

2.2 Assessment of consistency with the requirements of decision 2012/3

17. All adjustments have been justified with the explanation that these sources were unknown when the emission reduction commitments were set.

In case of a new emission source, the following information shall be provided:

- evidence that the new emission source category is acknowledged in scientific literature and/or the EMEP/ EEA Guidebook;
- evidence that this source category was not included in the relevant historic national emission inventory at the time when the emission reduction commitment was set;
- evidence that emissions from a new source category contribute to a Member State being unable to meet its emission reduction commitments, supported by a detailed description of the methodology, data and emission factors used to arrive at that conclusion.

The ERT concludes that the supporting evidence provided complies with the criteria presented in decision 2012/3, and that the circumstances on which the adjustment is based relate to a change in the understanding of the science relating to this source

The ERT reviewed the documentation that was provided to support the application (see annex).

The ERT is of the view that the application by France meets in general the criteria for the supporting documentation required by the Directive as listed above.

2.3 Assessment of the quantification of the impact of the revision

18. The adjustment application process requires that the Party submit a quantification of the impact of the adjustment for which an application has been submitted. Table 1 provides an overview of the NMVOC adjustment application of France in the Manure management and Agricultural soils sector as provided by France in Annex IIa.

19. In response to a question from the review team France provided details and further background documents on the model used to calculate emissions for 3De - cultivated crops. The ERT reviewed the quantification of the emissions adjustments provided by the country. The ERT concluded that the information provided was accurate and error free, and was consistent with the current EMEP/EEA Emissions Inventory Guidebook and scientific literature.

Table 1: Impact of adjustments on the NMVOC emission inventory of France for the year 2020 in kt

	Unit	2005	2020
ERC	% of 2005		-43%
ERC unadjusted	(kt)		905
NT for Compliance unadjusted	(kt)	1587	939
Gap to ERC unadjusted	(%)		-4%
ERC adjusted	(kt)		678
Adjusted NT for Compliance	(kt)	1190	550
Gap to ERC adjusted	(%)		19%
Impact of adjustment on NT for Compliance	(kt)	-398	-389

3 Conclusions and recommendations

20. The ERT has undertaken a full and thorough assessment of the application for an adjustment of the NMVOC emissions inventory that was submitted by France for the source sectors listed in Table 2.
21. The review of the submitted application followed the guidance provided in the Annex to Decision 2012/12 of the Executive Body of the CLRTAP. The findings of the ERT are described in detail in Section 2 of this report.
22. Table 2 below provides a summary of the adjustment applications received from France, and the subsequent recommendations made by the ERT to the EMEP SB.
23. The ERT recommends the EMEP SB to accept the new adjustment applications submitted by France.

Table 2: Recommendations from the ERT to the EMEP SB on new adjustments

Country	Sector	NFRs	Pollutant	Years	ERT Recommendation
France	Manure Management	3B	NMVOC	2005, 2020	Accept
	Agricultural soils	3D	NMVOC	2005, 2020	Accept

4 Information provided by the Party

24. Table 3 lists the information provided by the Party in its adjustment application. The information provided by Party can be downloaded from the CEIP website⁴.

Table 3: Information provided by the Party

Filename	Short description of content
annex_iaa_to_ece- eb.air130_adjustment_application_v20 21_FR_2022	MS Excel file with detailed data underlying the proposed adjustment applications for: Manure Management (3B) and Agricultural soils (NFR 3D)
UNECE_France_mars2022	IIR 2022, pdf-document ; here especially: Chapter 11. Adjustments.
FR_Notification_Template__CLRTAP_E MEP_emission_inventory_status_report _2022_FR	Word document
FR_ANNEX_Ila_2022.xls	Excel file

25. The ERT found it necessary to ask the Party for further information. The information provided is described in Table 6 below.

Table 4: Additional information provided by the Party

Filename	Short description of content
Adjustment Review 2022 - FR.xlsx	Excel file at "Clever space" - platform at Umweltbundesamt website
Revision du Modele COBRA du CITEPA, K. Pajot et. al, CITEPA 2003	PDF, Report describing the COBRA model

⁴ <https://www.ceip.at/gothenburg-protocol/review-of-adjustments>

References

Decision 2012/3 (ECE/EB.AIR/111/Add.1): Adjustments under the Gothenburg Protocol to emission reduction commitments or to inventories for the purposes of comparing total national emissions with them.

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/ece_eb.air_111_add.1_eng_decision_3.pdf

Decision 2012/4: Provisional Application of Amendment to the Protocol to Abate Acidification, Eutrophication and Ground-level Ozone

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/ece_eb.air_111_add.1_eng_decision_4.pdf

Decision 2012/12 (ECE/EB.AIR/113/Add.1): Guidance for adjustments under the 1999 Protocol to Abate Acidification, Eutrophication and Ground-level Ozone to emission reduction commitments or to inventories for the purposes of comparing total national emissions with them.

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/decision_2012_12.pdf

Decision 2014/1 (ECE/EB.Air/127/Add.1): Improving the guidance for adjustments under the 1999 Protocol to Abate Acidification, Eutrophication and Ground-level Ozone to emission reduction commitments or to inventories for the purposes of comparing total national emissions with them.

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/decision_2014_1.pdf

ECE/EB.AIR/130: Technical Guidance for Parties Making Adjustment Applications and for the Expert Review of Adjustment Applications, 14 April 2015

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/ece_eb_air_130_av_for_the_web.pdf

TFEIP 2022: Technical Guidance for Emissions Inventory Adjustments under the Amended Gothenburg Protocol: Inventory adjustments in the context of ERCs

<https://www.ceip.at/gothenburg-protocol/adjustments>

Data submitted by Parties applying for an adjustment:

<https://www.ceip.at/gothenburg-protocol/review-of-adjustments>

https://webdab01.umweltbundesamt.at/cgi-bin/adj_GP.pl

EMEP/EEA 2009: EMEP/EEA Air Pollutant Emission Inventory Guidebook 2009

<https://www.eea.europa.eu/publications/emep-eea-emission-inventory-guidebook-2009>

EMEP/EEA 2019: Air Pollutant Emission Inventory Guidebook 2019

<https://www.eea.europa.eu/publications/emep-eea-guidebook-2019>

ECE/EB.AIR/125: 2014 Reporting Guidelines (ECE/EB.AIR/125) for Estimating and Reporting Emission Data under CLRTAP

https://www.ceip.at/fileadmin/inhalte/ceip/1_reporting_guidelines2014/ece.eb.air.125_advance_version_reporting_guidelines_2014.pdf

The 1999 Gothenburg Protocol to Abate Acidification, Eutrophication and Ground-level Ozone

http://www.unece.org/env/lrtap/multi_h1.html

ECE/EB.AIR/114: The 1999 Protocol to Abate Acidification, Eutrophication and Ground-level Ozone to the Convention on Longrange Transboundary Air Pollution, as amended on 4 May 2012

https://unece.org/sites/default/files/2021-10/ECE.EB_.AIR_.114_ENG.pdf