

Convention on Long-Range Transboundary Air Pollution (CLRTAP)
42nd session of the Executive Body (EB 42, 12-16 December 2022, Geneva/hybrid)
Report on the review of the Protocol to Abate Acidification, Eutrophication and
Ground-level Ozone, as amended in 2012 (ECE/EB.AIR/2022/3)
Submission by the EU and its Member States
3 November 2022

The EU and its Member States thank the GP review group (GPG) for its work and welcome the Report on the review of the Protocol to Abate Acidification, Eutrophication and a Ground-level Ozone, as amended in 2012. We find this report well drafted and extremely valuable for future work.

Ahead of the discussions at EB 42, the EU and its Member States submit the following written inputs to the GPG which we hope are of help to the group in their continued work:

- On paragraph 22

It could be useful to add a footnote with the link to the 2021 WHO air quality guidelines (<https://apps.who.int/iris/handle/10665/345329>).

- On paragraph 40, subparagraphs *a* and *b*

The preliminary results of the European Commission's latest study for the preparation of the third Clean Air Outlook indicate that, for the EU Member States, inclusion or non-inclusion of condensables makes no difference in the likelihood of achieving the **2030 NEC Directive ERCs**. In the Commission's preliminary findings (planned to be published in early December 2022), there are no cases of EU Member States matching either the scenario in paragraph 40a or the scenario in 40b, for 2030 and beyond. The relevance of the hypothetical cases described in paragraph 40 could therefore be reconsidered in the light of this new modelling and the GPG may want to consider shortening or redrafting this paragraph.

- On paragraph 87

We would suggest to include complementary information in technical annex II to support the last conclusion in this paragraph where it indicates that “*Even the most optimistic scenario for 2050 still shows that 30 per cent of the population in the EMEP domain will be exposed to PM_{2.5} concentrations above the 2021 WHO guideline level and that, in the European Union, in 30 per cent of the ecosystem area, the nitrogen critical load will be exceeded. For non-European Union countries this figure will be 15 per cent*”. We also suggest adding a clarification on which indicator the 15% stands for.

- On paragraph 89 (a)

The difference between statements in paragraphs 89a and 32a could be more explained. Paragraph 32a mentions a gap for PM_{2.5} when it comes to reported emissions for 2019; this gap is no longer mentioned in paragraph 89a. Either of the two paragraphs should be complemented to address this difference.

To complement the reference to the emission reduction commitments, the role of the technical annexes could also be more clearly addressed in the conclusions to reflect the findings of part IV of the Review.

- On paragraph 89 (b)

The language in this paragraph is unclear; we propose as alternative and more exact wording the following (new text in bold; deletions in strike-through):

*(b) Emission reporting has generally improved, although there are still differences in the quality and completeness of the emission inventories reported by the Parties. ~~Policies and measures may be misrepresented in reported emissions~~ **There may be issues in how to correctly assess the impacts which policies and measures will have on actual emissions, resulting in differences between reported and actual emissions. Further effective reductions will depend on the decrease in actual emissions and on the reconciliation of reported and actual emissions;***

- On paragraph 89 (d)

This paragraph mentions PM-soiling but leaves out corrosion. Neither soiling nor corrosion for 2050 are mentioned in the report text nor in annex I. It is however mentioned in annex II (although regarding the year 2030, where the goal for corrosion is said to be met). Important conclusions should be part of the main report as well.

- On paragraph 89 (f)

In this paragraph, a minor editorial clarification could be added, also changing the verb “implement” when it comes to reduction commitments:

*(f) To increase the effectiveness of the amended Protocol, more Parties will have to ratify and implement **the Protocol and deliver on the associated** emission reduction commitments. This will require new flexibilities or other solutions to overcome the barriers to ratification faced by current non-Parties. Some of the technical annexes are considered too complex and demanding by some current non-Parties;*

- On paragraph 89 (g)

The information in the first and the last sentence in this paragraph is somewhat repetitive (insufficiency of available technical measures to achieve the long-term objectives of the amended Protocol); we propose to be slightly redrafted and shortened.

- On paragraph 90 (c)

It is not fully clear what is meant by “next emission reduction steps”. We propose to rephrase this paragraph for clarity:

c) **Continue to** apply a multi-pollutant/multi-effect approach ~~when preparing the next emission reduction steps~~, **in future analysis to identify and evaluate control strategies to reduce air pollution** including **exploring and benefiting from** synergies and interactions with other areas (such as climate change) and **taking into account** ~~including~~ non-technical measures (to increase the overall cost-effectiveness and coherence of policies in different areas). Optimize future scenarios for new interim impact targets for 2030/2035/2040, **possibly relative to a more recent base year.**

- On paragraph 90 (d) or elsewhere

Some wording on Convention actions to strengthen international cooperation on air pollution could be added in this paragraph, notably with reference to the newly established Task Force on International Cooperation on Air Pollution (TFICAP) as an important tool to make use of under the Air Convention.

- Regarding lessons learned and proposals for future work

We would like to suggest using, for future scenario analysis, the same indicators as the ones used in the Guidance document on health and environmental improvements using new knowledge, methods and data (ECE/EB.AIR/124):

- i. the percentage of ecosystem area where the critical load for nutrient nitrogen is exceeded (similar to how is done in Technical Annex); and
- ii. the average accumulated exceedance (AAE) or exceedances (similar to what is done in Scientific Annex).

Both indicators are complementary and provide information not only about the area affected but also about the distribution and pressure of air pollution on the ecosystems.
