

Responses to the questionnaire to guide the discussion at the thematic session on barriers and solutions

Introduction

The thematic session on barriers towards ratification and implementation of the amended Gothenburg Protocol, organised as an informal segment of the forty-second session of the Executive Body on Tuesday, 13 December, was dedicated to discussing barriers to ratification and implementation and solutions to overcome them.

The key findings and messages from this session will contribute to the review of the Protocol and beyond.

A list of guiding questions was prepared and sent in advance to the EECCA countries, Western Balkan countries and Türkiye to facilitate the discussions during the thematic session.

Following nine countries provided responses: Armenia (AM), Georgia (GE), Moldova (MD), Montenegro (ME), North Macedonia (MK), Serbia (RS), Russian Federation (RU), Türkiye (TR) and Uzbekistan (UZ). These respondents have a different profile which partly explains the extent to which these countries have made progress in ratifying and implementing the protocol:

- 1 responding country is not a Party to the Convention
- 8 responding countries are a Party to the Convention, of which
 - 5 are also EU candidate, and
 - 1 is also potential EU candidate

Below is a compilation of these responses. Uzbekistan, not being a Party to the Convention, provided one general response. Its response is included in the annex to this document. Türkiye's response was not included in the compilation at its request.

Summary - key findings

The questions were grouped into the following two blocks:

- Questions on the amended Gothenburg Protocol
- Questions on a possible future

With following questions on the amended Gothenburg Protocol

- Progress? Challenges? By when is ratification expected/feasible?
- Main barriers? What support helped/is needed? Other flexibilities needed?
- Is the amended GP considered a useful instrument? An asset? Pros/cons?

And with following questions on a possible future

- Preferences for next steps? Status quo? Revision of amended GP? Other? Which?
- Technical annexes: mandatory? Restructured? Separate sections for EECCA/WB/TR?
- Which policy targets are feasible for 2030, 2035, 2040

Summary of responses to the questions on the amended Gothenburg Protocol

- Progress? Challenges? By when is ratification expected/feasible
 - Significant progress reported in several areas: emission inventories and reporting, policies and measures, analysis, monitoring, legislation, ...;
 - Challenges: road transport (import vehicles), domestic heating, energy (lignite use), agriculture, diversity of sectors / regions, high PM/NO₂ concentrations (cities), improving emission inventories, setting emission reduction commitments;
 - Ratification: earliest by 2025 (1); by 2035-2040 (2); not a priority (1).
- Main barriers
 - Financial barriers (economic situation, low incomes, high abatement costs, insufficient financial support, ...)
 - Lack of capacity for preparing emission inventories, defining emission reduction commitments, modelling; frequent turn over staff ...
 - Regulatory barriers: aligning legislation is a demanding process, ...;
 - Complexity of the amended Gothenburg Protocol; retrofitting, high variety in technologies, local conditions, large number of requirements, ...;
 - Other priorities than air quality, lack of political will for improving air quality.
- What support (other than financial) helped/is needed?
 - EU association agreements (commitments in exchange for benefits, assistance, ...);
 - Capacity building projects (bilateral, international, TA/EX, EU, TFEIP workshops, ...);
 - Expert missions, hands on training, technical assistance of international experts;
 - E-learning course, webinars, TF meetings, EMEP Guidebook, info exchanges, dialogues,
 - Areas for support: air quality monitoring, modelling, emission inventories, action plans, adaptation national legislation,
- Other flexibilities needed?
 - Several respondents expressed a need for additional flexibilities
 - Ratification sector by sector is mentioned as a possible option
 - Update of timeline flexibilities (for application of limit values and limited reporting);
 - The use of the inventory adjustment procedure; improving guidance on the use of flexibilities and exchanging experience /information on the use of flexibilities.
- Is the amended GP considered a useful instrument? An asset? Pros/cons?
 - Pro:
 - Protocol as one single document bundling all requirements
 - Protocol as mandatory instrument attracts political attention, brings pressure;
 - For EU candidates: requirements in line with EU legislation.
 - Con:
 - Protocol is too complex (financial / human resources limited); mandatory nature;
 - Protocol lacks comparable support (unlike other international agreements);
 - Missing: various mechanisms (financial, technical, political) to support implementation;
 - Protocol is under-promoted in political circles (lack of awareness of importance).
 - Asset:
 - As one single document a useful reference/benchmark; important under LRTAP;
 - Supporting guidance documents, methodologies, science, emission inventory preparation, exchanges ...;
 - For EU candidates: main driver is association agreement (ratification as commitment), but risk of parallel processes.

Summary of responses to the questions on a possible future

- Preferences for next steps? Status quo? Revision of amended GP? Other? Which?
 - By several: preference to continue with the amended Gothenburg Protocol (in current or revised/restructured form); with due account of barriers; step by step transition towards ratification;
 - No preference expressed for a new legal instrument / approach;
 - Potential revision should be realistic; concern about potentially further increasing ambition;
 - Useful: new funding instrument; hybrid approach (protocol + voluntary instrument);
 - Further focus on awareness raising and capacity building is considered useful/necessary, extending to TR;
 - Initial focus on implementation: considered useful by some.
- Technical annexes: mandatory? Restructured? Separate sections for EECCA/WB/TR?
 - Mandatory vs voluntary: mixed response (also, mandatory but less stringent);
 - Broad preference for separate sections for EECCA/WB/TR;
 - Some preference for separate ratification of individual annexes.
- Which policy targets are feasible for 2030, 2035, 2040?
 - Acceding the amended Gothenburg Protocol is feasible in the long-term (by 2035?), although conditional (with support, flexibilities, ...);
 - Low quality of data and lack of capacities for emission projecting can prevent defining realistic expectations and targets for future periods;
 - Significant emission reductions achievable by 2030; one country has adopted the objective to half health damage caused by air pollution by 2030 compared to 2015.

**Compilation of responses from
Armenia, (AM), Georgia (GE), Moldova (MD), Montenegro (ME), North Macedonia (MK), Serbia (RS),
Russian Federation (RU) and Uzbekistan (UZ)**

Amended Gothenburg Protocol

1. What progress has been made in implementing the requirements of the amended Gothenburg Protocol (AGP) so far? Which sectors and/or pollutants pose the biggest challenge? When do you expect to achieve ratification and full implementation? Is ratification of the AGP in its current form feasible in the next 10 years?

AM	<p>Currently, the air quality management policy in Armenia is being built on the Comprehensive and Enhanced Partnership Agreement (CEPA) signed between the European Union, the European Atomic Energy Community and their Member States and the Republic of Armenia, on 24 November 2017 (entered into force on 1st March 2021) in the framework of the 5th Eastern Partnership Summit, with the synergy the Climate policy considering ratification of Gothenburg protocol of LRTAP convention, Technical regulations of Eurasian Economic Union, and provisions other Conventions signed by the Republic of Armenia.</p> <p>The roadmap for the implementation the commitments of CEPA was approved by the Decision of the Prime Minister of the Republic of Armenia N 666-L on June 1, 2019.</p> <p>The roadmap consists of actions of 6 EU directives related to air quality management and are linked to AGP:</p> <ul style="list-style-type: none"> • Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe • Directive 2004/107/EC of the European Parliament and of the Council of 15 December 2004 relating to arsenic, cadmium, mercury, nickel, and polycyclic aromatic hydrocarbons in ambient air • Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) • Directive 2004/42/EC of the European Parliament and of the Council of 21 April 2004 on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints and varnishes and vehicle refinishing products and amending Directive 1999/13/EC • European Parliament and Council Directive 94/63/EC of 20 December 1994 on the control of volatile organic compound (VOC) emissions resulting from the storage of petrol and its distribution from terminals to service stations • Council Directive 1999/32/EC of 26 April 1999 relating to a reduction in the sulphur content of certain liquid fuels and amending Directive 93/12/EEC <p>Besides, the Directive 2003/4/EC on public access to environmental information and repealing Directive No 90/313/EEC and Directive 91/676/EC concerning the protection of waters against pollution caused by nitrates from agricultural sources as amended by Regulation No 1882/2003, which are also included in the roadmap of CEPA, are related to AGP.</p> <p>In general, the approximation of above mentioned directives will be implemented during 2021-2027.</p> <p>As a first step of legislative reforms the Law on Atmospheric Air Protection was fully updated which was adopted by the National Assembly of the Republic of Armenia on 7 December 2022.</p> <p>In the updated law the definition of pollution level, and critical level of pollution, and its method of determination, limit value, agglomeration and zone, BAT, technical norms of emitted pollutants has been added.</p>
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	<p>The Provisions related to the technical regulation of emissions, accounting of emissions, distribution of credentials, to establish the integrated emission inventory of GHG and atmospheric pollutants have been added.</p> <p>In order to reduce emissions from mobile sources and protect the environment, legislative reforms and the development of the necessary infrastructure for the use of electric motor vehicles are ongoing in the Republic of Armenia.</p> <p>On December 10, 2021, the National Assembly adopted the law "On Amendments to the Tax Code of the Republic of Armenia", according to which, electric motor vehicles (belonging to the codes of the EEU ETA AA 8702 40 000, 8703 80 000 and 8711 60) buses, passenger vehicles, motorcycles and mopeds the period of exemption of value added tax on import and/or disposal has been extended until January 1, 2024.</p> <p>On March 17, 2022, a zero customs duty was set for the import of 7,000 electric cars in 2022 and 8,000 electric cars in 2023. The privilege also extends to electric cars imported after January 1, 2022.</p> <p>As a result of the reforms, in 2022, a significant increase in the number of exclusively electric motor vehicles imported into the RA territory was recorded.</p> <p>The number of vehicles with electric motor was 668 in 2019, in 2020- 2155, in 2021-6645, as of the 3rd quarter of 2022- 10421.</p> <p>The number of electric cars was 145 in 2019, in 2020- 258, in 2021-1898, as of the 3rd quarter of 2022: 2323.</p> <p>In 2019, "Armenian National Action Plan (NAP) for ratification CLRTAP protocol and fulfilment of correspondent commitments" was prepared by international consultants to the United Nations. The project for review and update of the plan is carried out under the assistance programme to support countries in Eastern Europe, the Caucasus and Central Asia (EECCA) with the aim to encourage ratification of the key protocols to the Convention on Long Range Transboundary Air Pollution, to raise the political profile of the Convention in the mentioned sub-region and to increase cooperation and exchange of information with countries in EECCA supporting their involvement in the Convention's activities. The basic conclusions and the next steps towards ratification of CLRTAP protocols were presented during the High-level awareness-raising meeting and roundtable discussion which took place 25 September, 2019 in Yerevan, Armenia.</p> <p>Based on the conclusions of NAP the CEPA contains obligations related to air quality, which would bring the country into the position to implement and eventually ratify the Gothenburg Protocol.</p> <p>Regarding to the ratification of GP, the biggest challenge will be the sector of road transport, agriculture, and residential stationary sources. Apart from that, it is also necessary to improve the road transport and residential combustion emission inventories, in order to get an accurate picture of the emissions of these sectors and to make emission projections.</p> <p>Although, by the RA Government Decision N 860-N, the permissible limit values of emissions of motor vehicles operated in the territory of the Republic of Armenia was defined in 2017, a significant part of motor vehicles operated in the country do not comply with adopted standards.</p> <p>According to the emission data of 2021, emissions into the atmosphere comprised 308.9 kt/y, 69.6% of which fell to the share of mobile (road transport), and 30.4% - to stationary sources of emission. The pollutants with the biggest emissions are carbon monoxide, non-methane volatile organic carbon, nitrogen oxides, and ammonia.</p>
GE	<p><u>Progress towards implementation of the requirements of AGP</u></p> <ul style="list-style-type: none"> • Significantly improved air quality assessment system. In particular: <ul style="list-style-type: none"> ○ Introduced EU air quality assessment regime and criteria; ○ Enlarged and modernized monitoring network; ○ Introduction of AQ modelling system; ○ Improved QA/QC.

- Improved emission inventory and emission projection.
 - Full time series emission inventory;
 - Improved data consistency;
 - Improved data transparency;
 - Developed emission projection;
 - Development of gridded emission inventory.
- Obligation for the subject of specific activities (almost all activities covered by Annex I of IED) to carry out continuous self-monitoring of emissions;
- Increased sanctions for the absence or non-use of emission abatement systems, for exceeding the emission limit values, for non-compliance with the conditions of environmental impact permit/environmental decision.
- Developed draft Law on Industrial Emissions (based on EID) that will introduce an integrated permitting system and implies application of modern environmental management principles, such as Best Available Techniques (BAT) and Emission Limit Values (ELV). Full implementation of the new law is intended by 2035.
- Adopted Government Resolution №256 (25.03.2017) on “Establishment of limit values of Sulphur content in certain liquid fuels” (in line with EU Sulphur Directive);
- Inventory of petrol storage terminals.
- Developed draft amendments of existing by-laws to introduce VOC emission reduction requirements during petrol storage and distribution (based on EU Directive 94/63/EC). Requirements for new installations will be entered into force from 1 January 2024 and for existing installations from 1 January 2029.
- The Euro 5 standard for petrol – since 2017.
- The Euro 4 standard for diesel – since 2019.
- The Euro 5 standard for diesel fuel – from 2023.
- State control of fuel quality launched in 2016 and more than 1200 samples were taken as of 2022.
- Sanctions for violation of fuel quality standards increased significantly.
- Promotion of clean transport including electric and hybrid cars by tax exemptions.
- Developed draft by-law on establishment of emission standards (Euro 5/V) for passenger cars and heavy duty vehicles.
- Developed "Voluntary Code - Best Agricultural Practice for Reducing Ammonia Emissions" to decrease ammonia emissions from agriculture (Based on “Framework Code for Good Agricultural Practice for Reducing Ammonia Emissions”). Code covers following issues:
 - Nitrogen management, taking account of the whole nitrogen cycle;
 - Livestock feeding strategies;
 - Low-emission manure spreading techniques;
 - Low-emission manure storage systems;
 - Low-emission animal housing systems;
 - Possibilities for limiting ammonia emissions from the use of mineral fertilizers.
- Developed draft by law to Introduce **legal requirements on use of organic solvents in paints** with the aim to reduce emissions of Volatile Organic Compounds (VOCs) (based on EU Directive 2004/42/EC) – will be entered into force from 01.09.2023.

The most challenging pollutants and sectors

In the biggest cities and next to international roads (some of them pass through the cities) annual concentrations of NO_x are higher than Georgian limit values (equal to EU limit values). Moreover, in the four biggest cities concentration of PM are higher than limit values. In particular, in Tbilisi annual and daily concentration of PM₁₀ are higher than limit values. In Rustavi, where is the biggest industrial zone, annual concentrations of both PM₁₀ and PM_{2.5}, and daily concentrations of PM₁₀ are exceeded. In other two cities (Batumi and Kutaisi) number of exceedances of PM₁₀ daily mean values are higher than 35.

Main and the most problematic source of NO_x emissions is a road transport sector. At this stage, in Georgia emission limit values for any mobile sources are not established. Georgia is not a vehicle manufacturing country. The vast majority of vehicle imports come from the USA. It is almost impossible to identify emission standard of vehicles imported from the US. This is the one of the main challenge at this stage to establish at least Euro 5 emission standard for

	<p>passenger cars and heavy duty vehicles. Furthermore, establishment of Euro 6 fuel quality standard will significantly increase price of petrol and diesel. Issue of fuel price in Georgia is extremely sensitive issue for general public. Increased fuel price affects the prices of most products.</p> <p>Another, very challenging sector (or source) is small combustion installations, especially stoves and boilers in residential sector. Wood burning in residential sector is the key source of PM2.5 emission in country (more than 76%). Wood stoves are mostly used in rural areas. Taking into account socio-economic situation in those areas introduction of mandatory emission limit values for stoves and boilers seems almost impossible in near future.</p> <p><u>Ratification and full implementation</u> Probably, from 2035 to 2040 Georgia will be able to ratify and fully implement the AGP.</p>
MD	<p>Moldova has signed but not ratified the Gothenburg Protocol, so it has not committed itself to the requirements of the amended Gothenburg Protocol.</p> <p>https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-1-h&chapter=27&clang=en</p> <p>The progress as a whole can be seen as the beginning and progress of work on the assessment of current total emissions of pollutants, which has already been carried out in several cycles of work: for 1990-2012, 1990-2014, 1990-2017, 1990-2019, 1990-2020. Total emissions have been calculated for all pollutants, and the trends in emissions across all categories have begun to be observed and analysed. Four editions of IIR books for this period were published (90-12; 90-17; 90-19; 90-20). Emission values for the country began to be analysed, which will allow to develop measures to reduce emissions on a continuous basis.</p> <p>The largest contributors to total emissions in 2020 are the categories listed below. The greatest attention to the development of measures to reduce emissions must be paid to two sectors - Residential: Stationary and Road transport: Passenger cars. Also a number of other sectors, the emissions of which are considered key (separately for each pollutant), require attention.</p> <ol style="list-style-type: none"> 1) 91% emissions of SO_x in 2020: <ul style="list-style-type: none"> ○ Road transport: Passenger cars- 1A4bi (44.0%), ○ Stationary combustion in manufacturing industry and construction: Non-metallic minerals 1A2f (34.8%), ○ Commercial/institutional sector: Stationary 1A4ai (12.2%); 2) 82.2% NO_x emissions from: <ul style="list-style-type: none"> ○ Road transport: Heavy duty vehicles and buses 1A3biii (31.2%), ○ Public electricity and heat production 1A1a (16.4%), ○ Agriculture/Forestry/Fishing: Off-road vehicles and other machinery 1A4cii (9.7%), ○ Road transport: Passenger cars 1A3bi (8.9%), ○ 3Da1 (8.5%), ○ Residential: Stationary 1A4bi (7.4%); 3) 81.2% NH₃emissions from: <ul style="list-style-type: none"> ○ Manure management - Swine (Sows+ Fattening pigs) 3B3 (24.9%), ○ Inorganic N-fertilizers (includes also urea application) 3Da1 (17.7%), ○ Animal manure applied to soils 3Da2a (16.5%), ○ Residential: Stationary 1A4bi (8.5%), ○ Other organic fertilizers applied to soils 3Da2c (7.3%), ○ Domestic wastewater handling 5D1 (6.2%); 4) 83.2% MVOC emissions from: <ul style="list-style-type: none"> ○ Other solvent use 2D3i (26.6%), ○ Road transport: Passenger cars 1A4bi (23.5%), ○ Coating applications 2D3d (10.7%), ○ Food and beverages industry 2H2 (6.1%), ○ Chemical products 2D3g (5.5%) 2D3a (5.5%), ○ Biological treatment of waste - Solid waste disposal on land 5A (5.2%); 5) 85.0% CO emissions from:

	<ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (72.0%), ○ Road transport: Passenger cars 1A3bi (7.7%), ○ Road transport: Heavy duty vehicles and buses 1A3biii (5.3%); <p>6) 85.1% TSP emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (41.9%), ○ Road paving with asphalt 2D3b (23.2%), ○ Chemical products 2D3g (19.9%); <p>7) 80.3% PM10 emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (71.4%), ○ Road paving with asphalt 2D3b (8.9%) <p>8) 87.7% PM_{2.5} emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (87.7%); <p>9) 86.0 % Pb emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (54.7%), ○ Glass production 2A3 (18.0%), ○ Stationary combustion in manufacturing industry and construction: Non-metallic minerals 1A2f (13.2%); <p>10) 80.3% Hg emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (26.0%), ○ Clinical waste incineration 5C1biii (21.8%), ○ Stationary combustion in manufacturing industry and construction: Non-metallic minerals 1A2f (14.3%), ○ Iron and steel production 2C1 (11.4%), ○ Public electricity and heat production 1A1a (6.8%); <p>11) 83.1% Cd emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (83.1%); <p>12) 91.9% DIOX emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (48.1%); ○ Clinical waste incineration 5C1biii (43.8%) <p>13) 88.5% PAH emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (73.2%), ○ Chemical products 2D3g (15.3%); <p>14) 95.7% HCB emissions from:</p> <ul style="list-style-type: none"> ○ Residential: Stationary 1A4bi (69.0%), ○ Clinical waste incineration 5C1biii (26.7%)
ME	<p>Montenegro ratified AGP in 2011, but failed to become a party to the Protocol since it was not feasible to commit to emission reductions as required by the Protocol. In the meantime, in the scope of the EU accession process, Montenegro prepared the Air Emissions Control Programme in line with EU acquis (NEC Directive) in order to reduce emissions of pollutants covered by the amended AGP.</p>
MK	<p><u>What progress has been made in implementing the requirements of the amended Gothenburg Protocol (AGP) so far?</u></p> <p>Emission inventory for all pollutants for whole time serial is reported on yearly base since 2016 and started with basic pollutants in 2005; IIRs were prepared by consulting company (2006, 2010, 2012), but from 2016 IIR onwards is prepared and reported on yearly basis by MEPP team received award for significant improvements in 2012 and 2016; LPS emissions are reported on regular base; Emissions per new EMEP grid reported in 2017 and 2021; Emission inventory became solid base for all strategic documents for prioritization of sectorial measures!</p> <p><u>Which sectors and/or pollutants pose the biggest challenge?</u></p> <p>Energy production due to use of lignite and households heating due to major use of wood and use of commercial stoves.</p> <p>Energy production contribute to emissions of: SOx (95%), Ni (65%), Hg (51%), Cd (25%) TSP (24%), NOx (22%), Pb (21%), PM10 (20%) PM2.5(12%). Combustion in households and</p>

	<p>administrative facilities contribute to emissions of: PM2.5 (69%), CO (68%), PAHs (65%), Cd (51%), TSP (39%), PM10 (46%), Pb (29%) and NMVOC (25%).</p> <p>With regards to pollutants the main problem with air quality is with particulate mater which is considered as critical substance.</p> <p><u>When do you expect to achieve ratification and full implementation?</u></p> <p>The preparation activities depend on the beginning of IPA II technical proposed project "Support for implementation of Air quality directives". In which the following activities are planned: full transposition of the new NEC directive in National legislation, Further improvement of the national emission inventory, Preparation of DSIP for the amended Gothenburg Protocol, Preparation of reduction commitments for 2030 for NOx, SOx, NH3, PM2.5 and VOCs accordance with Annex II of the amended protocol, Preparation of National Air Pollution Control Program for the period 2025-2035, Establishment of working group for implementation of NAPCP and implementation of protocols. Additional Adoption of the Law on industrial emissions and new Rulebook on ELV is expected for the next year. These are preparatory activities and preconditions to start ratification. The implementation of the requirements given in the AGP will be partial.</p> <p><u>Ratification of the amendments of the Gothenburg protocol: is ratification of the AGP in its current form feasible in the next 10 years?</u></p> <p>Depends on the finalization of IPA II project at earliest in 2025 amendments could be adopted.</p>
RS	<p>In the past ten years the Republic of Serbia has made a considerable progress in establishing the emission inventory. The last reported data are for the period 1990 to 2020 for all pollutants covered by CLRTAP protocols. However, Gothenburg protocol has not been ratified yet (neither original nor amended). Serbia did not establish any national emission reduction commitments. It is expected that ratification of Gothenburg protocol will be considered in parallel with the EU negotiations progress where Serbia is supported by Environment Accession Project (ENVAP3) funded by Swedish International Development Cooperation Agency (SIDA). It has to be noted that the ratification of the GP and its amendments is the final step once all the relevant sectoral policy gaps regarding the emissions from stationary, mobile sources, fuel quality and policy gaps related to ammonia emissions from agriculture sectors will be addressed.</p> <p>Public electricity and heat production is by far the biggest source of SO2 emissions. SO2 emissions are driven by the consumption of domestic lignite in thermo-power plants and the sulphur content of the domestic lignite. Serbia adopted National plan to reduce emissions of major pollutants from large old combustion plants (in 2020) to address the emissions from the biggest air pollution source in the country. However, since additional actions are needed both at the national and local level, Serbia prepared for the first time the National Programme of Air Protection of the Republic of Serbia for the period 2022-2030 with Action plan that includes measures and activities to reduce emissions from various sectors relevant for the Gothenburg protocol.</p> <p>When it comes to NOx emissions in Serbia, Public Electricity and Heat production is a predominant source of emissions. Transport sector is the next significant source of NOx emissions. Predominant source of emission of PM2.5 is Other stationary combustion (emission of PM2.5 from biomass and lignite burning in households), followed by Agriculture waste burning (field burning) and Industry. VOC emissions in Fugitive sector is followed by Other Stationary Combustion (with biomass burning in households). Predominant driver for trends of ammonia emissions is agriculture sector.</p> <p>It is also important to note that numerous of significant national subsidiary legislation as well as "umbrella" Law on Air Protection will enter the revision procedure in the next two years, which will enable further alignment with relevant EU legislation and more clearly determine the status of Serbia in relation to the requirements of the current protocol as amended.</p>
RU	<p>The Russian Federation is currently implementing two federal laws: 219-FZ of 21/08/2014 on the BAT implementation and Integrated Environmental Permitting, and 195-FZ of 23/08/2019 on an experiment on quotas for emissions of polluting substances, covering 41 settlements</p>

	<p>across the country with a focus on industrial sources, transport and individual households (residential heating).</p> <p>219-FZ prescribes 270 larger industrial facilities to apply for Integrated Environmental Permits by 2024 (extended timeline). That includes: up-to-date inventories for all media releases, BAT implementation programme with a 3-5-year timeline, continuous releases monitoring programme with 1-3-year timeline.</p> <p>195-FZ is region-oriented and based on the integrated assessment of air pollution in most polluted areas. The first step of the experiment includes modelling of air emission releases and distribution, identification of key (priority) polluters (industrial facilities, transport, sources of residential heating), and key pollutants to be further controlled. The second step includes comprehensive pollution reductions plans development and implementation on the public-private basis. Such plans typically include several activities aiming at measured emission reductions at identified sources: facility level emission abatement measures, e.g. improving filter efficiency, change of technology/efficiency improvement; urban management actions through road network development, conversion of public transport to LNG/CNG and development of electric mean; district heating development for areas with substantial contribution of residential burning sources into the overall pollution levels; subsidizing conversion to higher efficiency stoves/individual residential heating systems.</p> <p>The action target for 12 settlements, covered by the experiment Stage 1 (2020-2026) is 20% off in air pollution by priority pollutants, and Stage 2 target is the 50% cut in emissions of priority pollutants across all 41 settlements of the experiment by 2030.</p> <p>It is expected to reach significant air quality improvements in the most polluted areas of the country and meet the public request for cleaner air through aforementioned activities.</p> <p>The approach in implementation partly addresses the AGP provisions, yet is mainly region-, rather than sector-oriented. Most of industrial sectors, as well as transport, and residential heating, are super diverse across the country, with various generations of technologies being in operation in parallel. Partial reindustrialization, technology shift, as well as discontinuation of the most environmentally degrading practices, and further urbanization makes the system very dynamic and resource-intense. Therefore, numerous activities under the laws referred to above are implemented at various levels of private sector and state involvement, including corporate responsibility, state subsidy, grant and tax incentive instruments, as well as state credits, and commercial loans.</p> <p>Indirect economic restrictions and direct sanctions imposed on the Russian Federation and its national legal entities have significantly affected activities focused on industrial modernization, emissions reduction, development of air quality and emission control systems. It is expected to cause a further delay in full implementation of the developed provisions and subsequently in meeting the final pollution reduction targets.</p>
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2. What are the main barriers towards ratification and implementation of the AGP? Political barriers, financial barriers, institutional barriers, regulatory barriers, capacity and knowledge barriers and/or protocol-related barriers?

AM	<p>The informal document No 2 on the “Barriers to ratification and implementation of the Gothenburg Protocol, as amended in 2012, and potential solutions” prepared by the Gothenburg Protocol Review Group fully presents the overall barriers. Most of them are also relevant for Armenia.</p> <p>From the list of barriers, most need to be emphasized are the follows:</p> <p><u>Political barriers</u> Economic considerations and other priorities such as energy security, competitiveness, agriculture and climate change prevail;</p> <p><u>Financial and economic barriers</u></p> <ul style="list-style-type: none"> • Several protocol provisions require substantial investments and costs, mobile and stationary sources
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	<ul style="list-style-type: none"> Initial investment costs in modern monitoring stations <p><u>Capacity and knowledge barriers</u> In Armenia, the technical and administrative capacity and expertise in air quality management, monitoring and modelling, preparing and reporting of appropriate emission inventories and projections, and development of policies and legal instruments are insufficient and weak. Slow development of air quality and effects-based monitoring networks; Lack of up-to-date measurement equipment and methodologies; Lack of experience and resources in developing national actions plans or roadmaps; Insufficient understanding of the costs and benefits of abating air pollution (introduction of best available techniques): cost-benefit analysis is essential for designing cost-effective abatement strategies, which form the basis for decision-making, communicating and raising awareness on air pollution; Gaps in understanding of the protocol provisions and what is needed to ratify and implement them;</p> <p><u>Technical and protocol design related barriers</u> Insufficient quality of emission inventories for the five main pollutants (SO₂, NO_x, VOC, NH₃ and PM_{2.5}) to be able to establish meaningful emission reduction commitments; The complexity and the large number of the protocol provisions (contributing to a capacity gap that acts as a barrier);</p>
GE	<p>The most important barrier towards ratification and implementation of the AGP is socio-economic situation in the country. For example, due to difficult socio-economic situation in the near future it is impossible to introduce Euro 6 standards for fuel and vehicle emissions. The same is true for small combustion installations. Due to difficult socio-economic situation in the rural areas it is impossible to establish mandatory emission limit values for wood stoves and boilers. The income of small and medium-sized enterprises is also low, so the Government (primarily the Ministry of Economy) will block any legal initiatives aimed at establishing any restrictions for small combustion installations. This factor reduces the political will to introduce unpopular and harsh measures.</p> <p>Economic growth and the creation of an attractive investment environment by minimizing the regulatory framework is top priority for the government. Limited political will leads to insufficient funding and human resources in the field of air quality management.</p> <p>Lack of adequate knowledge and capacity in the state and private sectors required for the introduction of BATs is another very important obstacle. Brain draining from state authorities to the private sector is also a very challenging issue.</p> <p>The high capital costs of BAT are also a significant constraint.</p> <p>And the last, but perhaps the most important problem is the lack of a tool in AGP, namely carrot. Unfortunately, improved air quality is not considered to be a tangible benefit that can outweigh the costs and difficulties associated with the implementation of the AGP. Thus, without offering other concrete benefits (such as: financial support for the introduction of BATs and/or introduction of a system for the calculation and assessment of the adverse effects associated with air pollution, etc.), it will be practically impossible to move forward with ratification.</p>
MD	<p>The complexity of the Protocol, and lack of funds to enhance the capacity and knowledge of human resources are the main obstacle to ratification</p>
ME	<p>The main barriers so far were related to a specific situation of the country related to emissions of SO₂ and NO_x, coming from the single key source (thermopower plant Pljevlja). Emissions from this particular source are estimated to be more than 90% of total national emissions of SO₂ and some 70% of NO_x. Finally, in April 2022 first steps were taken towards reconstruction of the power plant, comprising installation of the abatement equipment which will drastically reduce emission of SO₂ and NO_x in the range of 50-80% of the total emissions from this source.</p>

	Another barrier to successful accession to the Protocol relates to very limited capacities for regular reporting on emission inventories and especially for emission projection development.
MK	ELV given in the Annexes of the amended Gothenburg are still not transposed in the National legislation. The IED and MCP are not transposed yet but the procedure for their transposition has begun. There is limited technical capacity for preparation of emission reduction commitments that will be incorporated in the Annex II. The knowledge for modelling in different sector is limited. Therefore we depend on IPA project on this activity, which was cancelled and reannouncement is time consuming. No national strategic documents were developed for reduction for air emissions in the latest years due to limited capacities and knowledge. The previous documents like National emission reduction plan for LCPs, National air quality plan 2012-2017 and National emission reduction program under Directive 2010/81/EC were developed with technical support within projects and TAEIX workshops. The implementation of amendments will require major financial investments especially in energy production sector and households combustion sector.
RS	<p>Regulatory barriers. The national legislation is in the phase of alignment with the EU directives relevant also for the Gothenburg Protocol requirements and this process is very demanding and complex and requires time as well as resources.</p> <p>Also, capacity barriers are identified. Lack of human resources in relevant institutions responsible for preparing and reporting emission inventories and projections, developing of policies and legal instruments exists.</p> <p>Institutional barriers. Coordination between different governmental bodies from different sectors such as environmental protection, energy, agriculture, transport and exchange of information between them, must be strengthened. There are also divisions of responsibilities at the local, provincial and state levels which additionally makes coordination and implementation more challenging.</p> <p>In addition, economic barriers exist. Investment costs as well as operational and maintenance costs which are related to the information system and the operators, are very high.</p> <p>Also, it has to be noted that implementation of measures that are contained in the National Programme of Air Protection of the Republic of Serbia for the period 2022-2030 with Action plan will have significant costs in order to fulfil the objectives of NEC and Ambient Air Quality directives, as well as others relevant for the protocol.</p> <p>Protocol-related barriers. Difficulties in meeting some of the protocol requirements may be sufficient reason not to ratify the entire protocol. Also, the complexity of the protocol challenging.</p>
RU	<p>The main barriers are:</p> <ul style="list-style-type: none"> • significant diversity in technology levels across all major industrial sectors makes it increasingly difficult to apply a universal/unified approach and to ensure compliance; • high variety in local conditions of industrialized areas across the country, this includes climatic/meteorological conditions, level of socio-economic development, level of public awareness in relation to air quality issues; • economic and financial constraints due to sanctions; • complexity of the AGP that causes institutional difficulties and increases “power play conflict” between socio-economic, industrial development, and environmental considerations.

3. What kind of support has helped so far? What has been most welcome? What further support besides financial support is still needed?

AM	The organization of capacity-building workshops (2019 and 2018) on emission inventories and reporting obligations in accordance with the Convention’s requirements has helped Armenia improve the Emission Inventory and reporting.
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	<p>To support Armenia also to all ECCA countries, in the ratification and implementation of commitments of GP, through national and regional projects the main steps and actions are as follows:</p> <p><u>Develop technical capacity in terms of air quality monitoring</u></p> <ul style="list-style-type: none"> • Modernize existing air quality monitoring system in accordance with international requirements, • Introduce air pollution modeling and forecasting system, linkage to the satellite data <p><u>Improve the emission inventories and develop the emission projections</u></p> <ul style="list-style-type: none"> • Introduction of advanced methodologies for the development of emission inventories (mobile sources, fugitive emissions from diffused sources) • Introduction of advanced modeling tools for the development of emission inventories and emission projections <p><u>Adapt the national legislation to GP commitments</u></p> <ul style="list-style-type: none"> • Adaptation of the commitments of CEPA/directives into national legislation and implementation of its • Integrate emission ceilings/emission reduction commitments into the national legislation • Harmonization of fuel quality standards with the requirements of the Protocols • Develop the optimal and most efficient policies introducing emission limit values for mobile sources <p><u>Develop the national framework of the information exchange between different initiatives and policies such as Climate change, stakeholders</u></p> <p>Continue fundraising efforts to support in particular the EECCA countries in implementing the provisions of the amended Protocols.</p>
GE	<p>In case of Georgia, the most helpful is Association Agreement between EU and Georgia (AA). Issues covered by this agreement are most advanced. Reason of this success is that from implementation of AA country receives very concrete benefits, both political and economic (DCFTA). Thus, this document is an excellent instrument to introduce regulations and measures covered by the AGP.</p> <p>Capacity building activities in to improve emission inventory and introduce emission projection were very useful. However, of course this is not enough to ratify the AGP. Due to frequent turnover of staff, further support to increase capacity is necessary.</p>
MD	<p>Significant support was provided by the opportunity to complete the online course on the Convention on Long-range Transboundary Air Pollution, and especially Module 2 on the Gothenburg Protocol, its key principles, core obligations and provisions of technical annexes to be complied with by Parties to the Protocol.</p>
ME	<p>Recent international projects helped in re-calculation of the emission inventories with the newest EMEP/EEA methodology (2019) but further capacity building is necessary in order to achieve regular emission reporting and emission projection expertise.</p>
MK	<p><u>What kind of support has helped so far?</u></p> <p>Continuous improvement of inventory using TAEIX instrument, EU projects, TFEIP workshops, COPERT workshops, regional meetings, Stage 3 review reports and participation (3 experts).</p> <p><u>What has been most welcome?</u></p> <p>The expert missions in which we have hands on training with technical experts.</p> <p><u>What further support besides financial support is still needed?</u></p> <p>Straightening capacities for emission inventory improvement, modelling and projections through expert missions or specific technical workshops. Please have in mind that due to the different stage of development in the area of air emissions the regional workshops are not so beneficial.</p>
RS	<p>Balkans project supported the implementation of the Convention on Long-range Transboundary Air Pollution in Western Balkan countries, and it was completed with following</p>

	<p>major outputs: Serbia developed the National Action Plans for the implementation and ratification of the three most recent protocols of the Convention and Serbia deposited its instrument of ratification of the Protocol on Heavy Metals and the Protocol on Persistent Organic Pollutants in 2012. However, the ratification of Gothenburg protocol was postponed.</p> <p>Continuation of capacity building activities for the SEE countries is still needed. Training opportunities for the SEE countries have been identified as potentially helpful, especially in a region where several countries face similar problems. Also, it would be very useful to share the experiences of the countries Parties of the amended Gothenburg protocol original in fulfilling the requirements of the protocol, as well as difficulties and cases of non-compliance and the way they were overcome, with the countries that have not yet ratified the GP. This would certainly help in defining further steps and planning on the way to the common goal of joining the GP.</p> <p>The support from UNECE, Parties to the amended GP and its relevant bodies would be very much welcomed, especially regarding the organization of such trainings and provision of technical support for the national experts. Such support, resulting in exchange of experiences and knowledge will help strengthening Serbian national expertise, filling in the existing gaps and uncertainties as well as achieving the common goal of providing measurable and sustainable data in support to the Convention work. Participation of SEE countries in joint training programs, exercises and workshops is of importance for improving the knowledge and skills of relevant national experts.</p> <p>In addition, strengthening of institutional and administrative capacities is necessary to enforce the IPPC permitting system and to introduce BAT for key industries in the country.</p> <p>Capacity building and awareness raising and strengthening of monitoring, reporting and data management between all stakeholders relevant for implementation of AGP are considered necessary.</p> <p>Also a detailed step-by-step analysis should be done prior ratification process, which would include comparative analysis of the obligations arising from the amended Gothenburg Protocol in accordance with all relevant Serbian legislation in force; state of compliance of the relevant national legislation concerning different sectors according to the requirements of the amended Gothenburg protocol; gap analysis and development of proposal for the implementation of the measures prescribed by the amended Gothenburg protocol.</p>
RU	<p>Information and experience exchange in BAT, integrated environmental permitting, emissions inventory development, continuous emissions monitoring have been utmost helpful. In particular, EU BREFs have become the basis of the Russian BAT reference documents. EEA/EMEP Guidance has been a valuable reference document at both governmental and industrial levels. Awareness-raising instruments developed under the Convention have been in use to better explain some key issues related to air pollution.</p> <p>Prolonged unbiased and politically neutral multistakeholder dialog is utmost desirable to maintain interagency and peer-to-peer expert communications during turbulent times.</p>

4. Are additional or different flexibilities needed to facilitate ratification and implementation of the AGP? Which?

AM	The LRTAP convention and its protocols, particularly the Gothenburg protocol, are multilateral and cross-sectoral, touching all branches of the economy and the policies. This a one of the barriers of countries in ratifying the Gothenburg protocol. It requires great inter-sectoral cooperation, rapid exchange of information and stable economic and political situation.
GE	Ratification sector by sector can be an option. However, without introduction of funding mechanism in the protocol it would be extremely difficult to achieve full ratification.
MD	Yes, there is a need for additional flexibilities
ME	Taking into account the size of Montenegro and the total amount of national emissions, once the major sources are addressed it will be difficult to achieve further reductions. Also,

	reporting capacities have to be improved in order to reflect the emission reduction efforts. For example, if Tier 1 is used for estimation of emissions from agriculture sector, only reduced number of domestic animals will affect reported emissions, while all other policies and measures will not be reflected.
MK	The timeline flexibilities may be updated.
RS	Flexibilities such as reporting of limited emission inventories and longer timescales for application of limit values were found very useful. The inventory adjustment procedure can also facilitate compliance with obligations. Also, development of Guidance for the proper application of flexibility provisions would be important. Also, it would be significant and useful to exchange of experiences and difficulties in applying the existing flexibilities so far by Parties to the AGP with SEE countries.
RU	Currently, AGP ratification is not considered a priority by the Russian Federation. Implementation of actions under the laws as referred to above is expected to substantially increase air quality and put in full practice BAT-related instruments. The overall result may become the basis for future consideration of the GP ratification.

5. Is the amended Gothenburg Protocol (AGP) considered a useful instrument?

- a. What are the advantages and disadvantages of this instrument in the context of your national circumstances?

AM	/
GE	Advantage is that in one document you can find almost all EU requirements related to EU clean air policy. Disadvantage is that the protocol is too complex. The amount of obligations is intimidating and taking into account very limited human and financial resources, looks very difficult to fulfil.
MD	A step-by-step transition to ratification would be desired
ME	The main advantage of the instrument relates to international pressure for improvement of air quality, but unlike the other international instruments (e.g. climate convention) it does not provide comparable support to enhance the achievements of the objectives of AGP.
MK	The stricter ELV are beneficial for reduction of emissions coming from the industry. However, there is a need for adjustment of the industry as well.
RS	The strategic commitment of the Republic of Serbia is the accession to the EU and harmonization of national legislation with the EU environmental <i>acquis</i> , as well as ratification and implementation of the three latest protocols to the Convention on Long-Range Transboundary Air Pollution. Republic of Serbia is Party to the CLTRAP and EMEP protocol by succession since 2001 and since 2012 also a party to the 1998 POPs protocol and the 1998 Protocol on Heavy Metals. Consistent enforcement of the provisions of these protocols are directly related to the EU accession process, primarily due to the fact that requirements of the protocols are also part of the current EU legislation with which Serbian national legislation is intensively harmonized. On the other hand, GP as an international treaty that prescribes similar requirements, also requires additional parallel processes of monitoring and reporting the compliance of national legislation and implementation, which could complicate procedures in the country and contribute to difficulties in understanding of the obligations.
RU	/

- b. Is its mandatory nature necessary to attract sufficient political attention and create sufficient political will for the required measures?

AM	/
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GE	The status of the Protocol definitely attracts political attention, but the mandatory nature of the very stringent requirements practically kills political will.
MD	No, there is no need for a mandatory nature. Voluntary commitments would be preferable to, and more fruitful than, requirements that are difficult to fulfil.
ME	Yes. EU makes it even stronger in its own legislation. However, my personal impression is that AGP is not promoted enough in political circles and decision makers are not aware enough of its importance, while they are mostly familiar with GHG emission reduction obligations.
MK	Yes.
RS	/
RU	/

- c. As an instrument that brings emission reduction commitments, reporting requirements and source-based emission requirements for a variety of pollutants and activities together in one single document, is the AGP an asset or does this essentially prevent ratification? Do the mandatory emission limit values in the technical annexes help with implementation or, at the same time, also hinder ratification?

AM	/
GE	In general, existing the huge amount of topics and obligations covered by the protocol can be considered as an obstacle rather than an advantage. Having specific emission limit values is very helpful in determining what should be achieved. However, when we compare them with the existing local limit values, their mandatory nature makes them a barrier to ratification.
MD	The Protocol is a benchmark for emission reduction work. Perhaps the new Parties to the Protocol should be given time and assistance in preparing the first AGP report. In the process of such cooperation, all the difficulties and shortcomings of this instrument will become clearer.
ME	What is missing is the enhanced international dialog. Mandatory emission limit values are not by themselves contributing to implementation. Implementation has to be supported through various mechanisms both financial and with technical and political dimension.
MK	They help with implementation. The IED and MCP are in compliance with these values so they do not present an additional burden with EU candidate country.
RS	Difficulties in meeting some of the protocol requirements may be sufficient reason not to ratify the entire protocol. The mandatory emission limit values in the technical annexes at the same time, could also hinder ratification. Also, establishing of reliable national emission reduction commitments is a long complex process that require prior extensive analyses of national data and this may slow down ratification. Complexity of the AGP protocol, large number of protocol provisions covering different sectors can be an obstacle to ratification. Coordination between different governmental bodies from different sectors and exchange of information between them, is often very challenging which could affect implementation.
RU	/

- d. Does the AGP have added value compared to own implemented and planned national legislation or compared to EU legislation used as a reference by countries that have agreements with the EU?

AM	/
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GE	Very minor. The main driver in Georgia is and AA with EU (please find answer on question 3).
MD	<p>The Protocol is an important international document, and it provides guidelines for the work in countries on the arrangement of measures to reduce emissions at the national level and is used as a reference document for comparing emissions of pollutants in the country with the limit values specified in it.</p> <p>The Protocol documents describing possible emission reduction measures by sector and the experience of other countries in implementing the Protocol, the difficulties and achievements obtained as a result of the measures are useful.</p>
ME	As described above, EU has added the value to AGP transforming it from soft international law into mandatory requirements for EU member states and candidate countries. Montenegro has the ratification of the amended Gothenburg Protocol within the negotiation benchmarks for closing accession negotiations with EU.
MK	Yes, it gives added value. As a party to the protocol, we implement all requirements for preparation of emission inventory and reporting and by being active in the work of LRTAP and its bodies we are improving our inventory and implementing NEC directive even it is not yet transposed and we are not EU member.
RS	Under the scope of the Convention and its work, AGP has significant value. With this instrument, specific measures to be taken by the Parties to reduce their air pollutant emissions and thus affecting also globally, are identified. Parties develop policies and strategies to combat the discharge of air pollutants through exchanges of information, consultation, research and monitoring, which is of great importance for each country individually.
RU	The GP is considered a valuable framework, implementation of which by resource-ready countries brings important experience and lessons learned. Supporting methodology and guiding documents based on fundamental and applied research are readily applicable and very much welcome by many developing countries and countries with economy in transition across the globe. The AGP can serve as a model target/reference for many countries that cannot directly adopt and implement it in its entirety, yet sector specific approaches, targets and instruments have been in use by many, including the Russian Federation. In fact, a number of air quality governance related developments across the EECCA region have been moving forward in accordance with or with a close look at the GP/AGP over the past 10 years.

Future

6. What is your preference if any?

- a. Do you prefer to continue working with the present AGP and further focus on the necessary capacity building and awareness raising to facilitate its ratification and implementation?

AM	Yes, considering the conclusions of the “Armenian National Action Plan (NAP) for ratification of CLRTAP protocols and fulfillment of correspondent commitments”), the ratification of AGP will be fasten by implementation national and regional project.
GE	I do not think that this is the right way to achieve ratification and implementation.
MD	<p><u>What is your preference if any?</u></p> <p>To promote the implementation of the Protocol in national documents, it is necessary to carry out the inventory and assessment of total emissions (according to EMEP) in a stable and optimal way, so that the country can report annually and in a timely manner. This requires an annual contractual agreement with the implementers.</p> <p>The Implementing Group, thanks to the assistance of the Ministry of Environment, the UNECE training workshops over the last 5 years, some completed e-courses and its own efforts, has sufficient capacity to undertake emissions inventories for all sectors as well as other work in this area (projections, mapping, development of a dedicated website, etc.). The current institutional state is not satisfactory, and some of the work is done on a voluntary basis (publication of the book "Information Inventory Report-2022", development of the first version of the website on emissions of 25 pollutants, etc.).</p> <p>The second point is the need to expand the possibilities of direct measurements of pollutants with the special equipment. Therefore, additional resources are needed to carry out such works, including regular inventories of emissions.</p> <p><u>Do you prefer to continue working with the present AGP and further focus on the necessary capacity building and awareness raising to facilitate its ratification and implementation?</u></p> <p>Yes, time and efforts are needed to build further capacity and awareness, because the Protocol is extensive and complex. It is good that the text of the Protocol is available in other languages, for which we can thank the secretariat for its efforts. Particularly noteworthy was the fact that E-courses, including in several languages, were available, which gave an opportunity to broaden the audience.</p> <p>Work can continue if new measures and reporting provisions are not mandatory for new Parties.</p>
ME	Yes.
MK	On the necessary capacity building and awareness raising to facilitate its ratification.
RS	/
RU	In principle, yes. This approach has been particularly beneficial for a number of EECCA countries. Further awareness raising works both ways, informing not only non-parties about the existing experience/capacities, but also letting know parties of the non-party views, problems and perspectives.

- b. Do you prefer a targeted revision of the AGP to further facilitate its ratification and implementation?

AM	/
GE	Zero ratification outside of EU and North America clearly shows that revision is necessary. Together with other substantial changes (please see answers below), for non-parties should

	be established new base years (not one year) and reporting timeline should be shortened as well (e.g. start not from 1990, but 2010).
MD	/
ME	/
MK	Maybe on the expired time periods.
RS	Targeted revision of the AGP concerning flexibilities would be very beneficial.
RU	No particular preference.

- c. Do you prefer a new instrument or approach to make further progress in reaching the long term objectives on health and ecosystems?

AM	/
GE	I think that the revised protocol that will contain separate part for non-parties and/or new flexibilities (such as sector by sector ratification) and with resourceful funding instrument could be a quite effective tool to achieve the long term goals.
MD	/
ME	/
MK	No, it takes a long time for preparation and negotiations.
RS	/
RU	No. Legacy problems still persist. Gradual implementation of the existing provisions by non-parties, even if considered outdated by the forerunners, is considered more beneficial than rearranging the setting altogether.

- d. If so, would you favour a mandatory instrument, a voluntary instrument (e.g. similar to the Batumi Action on Clean Air) or a hybrid approach? Any initial ideas?

AM	/
GE	In parallel to the mandatory instrument, a voluntary tool (the BACA) was very efficient in Georgia. Thus, we are in favour of a hybrid approach. However, it is important to promote the launch or continuation of the voluntary instrument at a high level, and then actively communicate with parties about the implementation of voluntary commitments taken, as well as suggesting to take new commitments. Successful fulfilment of voluntary commitments should be internationally recognized and relevant information should be effectively disseminated to create greater interest.
MD	Preference is given only to voluntary instruments.
ME	/
MK	/
RS	/
RU	Step-by-step approach, gradual implementation/ratification should not require a new instrument to be developed.

- e. Are you open to discuss a revision of the AGP or a new instrument that adds new requirements (for example with respect to CH₄) and increases the ambition towards meeting the long term objectives on health and ecosystems? On what terms?

AM	/
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GE	Yes, but new requirements should be implementable for my country.
MD	This question requires further consideration.
ME	/
MK	Yes.
RS	/
RU	The AGP as it stands has proved itself as one of the most ambitious MEA instruments to date. Gradual implementation/ratification approach can be considered for increasing the ambition level for those who consider themselves ready to do so. No further universal/general obligations are considered feasible, and thus no further revision along this line is practical.

- f. Should the Technical Annexes containing the emission limit values remain mandatory in case of a revision of the AGP? Should they be restructured per sector? Should they include separate sections for the EECCA and Western-Balkan countries? Should the protocol be unbundled into a core instrument (framework protocol) and various separate technical annexes that can be ratified separately and incrementally? Should the emission limit values be moved to a non-mandatory guidance document to be used as advisory guidelines instead of obligations? Other options?

AM	/
GE	Emission limit values should be restructured by sector in the EECCA and Western Balkan countries sections, stay mandatory but be less stringent than they are now. In this case, probably it will be very difficult to identify new ELVs that can be suitable for all countries in this regions. Another approach can be just to restructure existing mandatory ELVs per sector in separate annexes which can be ratified separately.
MD	Yes, it would be useful and effective to include in the text of the Protocol separate sections for EECCA countries, as was done for Canada and the United States; it would be desirable to specify the emission limits in such a document.
ME	/
MK	Maybe different ELV for EECCA and WB countries. The ELV should stay mandatory. Separate Annex ratifications maybe more complicated.
RS	/
RU	<u>Yes, the following option should be considered:</u> “the protocol be unbundled into a core instrument (framework protocol) and various separate technical annexes that can be ratified separately and incrementally” <u>Yes, the following option should be considered:</u> “the emission limit values be moved to a non-mandatory guidance document to be used as advisory guidelines instead of obligations”

- g. Should the policy focus shift from promoting ratification of the AGP to implementation of measures. Focus in the short term more on solutions that are aimed at implementation? Pending ratification of the AGP, how can progress in the implementation of measures in EECCA and Western Balkan countries be made visible to more clearly demonstrate the added value of the AGP to the general public?

AM	/
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GE	<p>Definitely focus should be on implementation. Progress in implementation will naturally entail readiness for ratification.</p> <p>It is necessary to show benefits of ratification of the protocol to the general public and raise their awareness, but some times and in some cases it is more important to do this for decision makers.</p>
MD	<p>It is desirable to increase visibility of Protocols of the Convention, in particular, AGP, to ensure transparency in reporting on AGP.</p> <p>Actions on ratification and development of measures should be considered as two separate lines of activity.</p>
ME	<p>Public awareness is necessary. While the globe is generally aware of negative impacts of GHG gases, obvious negative effects of air pollution stayed neglected and outside environmental community nobody knows about Gothenburg Protocol and its importance. More political and general awareness is necessary. If AGP continues to be discussed only in Geneva in closed circles of air pollution experts it will not enhance its ratification nor implementation.</p>
MK	/
RS	<p>It would be of great importance to focus not only on promoting ratification of the AGP but also implementation of measures, as well as to focus in the short term more on solutions that are aimed at implementation.</p> <p>Progress in the implementation of measures in EECCA and Western Balkan countries could be made visible through capacity-building programmes and regional and national trainings to help countries put recommendations into practice, platforms for international policy dialogues in order to exchange of best practices and lessons learned. Through development of guidance and practical solutions to problems identified by experts.</p>
RU	<p>Proposed approach is definitely worth considering. As mentioned above, a number of actions being taken by various parties to the Air Convention, are more or less in line with the AGP provisions with no clear reference/link to it. Making the AGP a “golden standard”/point of reference may be as beneficial for some non-parties without the ratification requirement and related uncertainties.</p>

7. Which policy targets are considered technically and politically feasible for 2030, 2035 and 2040 for your country, as well as the most effective pathway to reach these endpoints (acceptable loads and levels on health and ecosystems).

AM	/
GE	<p>If Georgia becomes an EU candidate country and the financial and political support towards EU membership continues, we believe that by 2035 the country will be able to realize most of the AGP, if not all of it. Candidacy for EU membership is the best way to achieve cleaner air in Georgia.</p>
MD	<p>AGP ratification is possible in the long term using flexible possibilities and approaches, with sufficient elaboration of all aspects of impact of requirements of the Protocol and its Annexes in the national economy.</p> <p>These complex issues require additional study and consideration in the country.</p>
ME	<p>As described above, low quality of emission data and lack of capacities for emission projecting prevent us from defining realistic expectations and targets for future period up to 2040. However, significant emission reductions of SO₂ and NO_x are certain in Montenegro by 2030.</p>
MK	/
RS	<p>Programme of Air Protection of the Republic of Serbia for the period 2022-2030 with Action Plan is adopted by the Government of the Republic of Serbia on 8th December 2022.</p>

	<p>The general objective of this Programme is: <i>To reduce up to 2030 the health damage due to poor air quality by half compared to 2015 by reducing exposure to air pollution while aligning Serbia with the European Union’s regulatory limits to air pollution and limiting the damage on ecosystems.</i></p> <p>For the Programme purposes and achievement of the air quality vision, in addition to baseline (WEM) scenario, three air quality mitigation scenarios were analysed: WAM A (With Additional Measures A); WAM B (With Additional Measures B, intensive control scenario); WAM C (With Additional Measures C, full control scenario that has the greatest positive environmental impact and health benefit).</p> <p>Action plan is an integral part of this Programme and is prepared for the period of 5 years (up to 2026). The list of measures and activities, their effects, impacts, responsible institutions, deadlines, financial resources and other information related to monitoring and reporting on measures and activities, are described in detail in the Action Plan.</p>
RU	<p>Currently set targets are:</p> <p>20% reduction in air pollution levels in 12 most polluted settlements by 2026;</p> <p>50% cut in emissions in 41 most polluted settlements by 2030.</p>

Annex - Response from Uzbekistan - unofficial English translation

UZ	<p>The Republic of Uzbekistan is currently not a party to the Convention on Long-range Transboundary Air Pollution (hereafter LRTAP), and has not ratified the Gothenburg Protocol "On the Control of Acidification, Eutrophication and Ground-level Ozone".</p> <p>At present, issues on the accession of the Republic of Uzbekistan to the LRTAP Convention are included in the "Road Map" in the field of environmental protection, approved on 01.08.2019 by the First Deputy Prime Minister of the Republic of Uzbekistan A. Ramatov, where under this "Road Map" it was decided to establish a working group of all ministries and departments involved in the Republic to study the feasibility of accession to the LRTAP Convention.</p> <p>Also, issues of relevance of accession of the Republic of Uzbekistan to the LRTAP Convention were included in the strategic document - the Concept of Environmental Protection of the Republic of Uzbekistan until 2030, approved by Presidential Decree No. 5863 of 30.10.2019, where systematic work on acceding the Republic to the LRTAP and its Protocols is carried out.</p> <p>For the Republic of Uzbekistan, issues related to the setting of emission limits and, accordingly, the quantitative reduction of pollutant emissions (SO₂, NO_x, VOCs and NH₃) are relevant and timely.</p> <p>We believe that setting strict limit values under the Gothenburg Protocol for emission sources from electricity generation as well as passenger car and truck manufacturing would result in significant emission reductions, where there would also be an effect in the form of the introduction of energy-saving technologies.</p> <p>At present, an assessment of the possible financial, economic or other consequences of the accession of the Republic of Uzbekistan to the LRTAP and its Protocols will need to be carried out for the Republic, for subsequent submission to the relevant structural organisations of the Republic.</p> <p>We believe that it is difficult for us to carry out this type and scope of work and that the assistance of international experts, with the involvement of national experts, will be required to carry out this task and other additional work.</p> <p>In this connection, we propose to consider providing technical or other assistance to the Republic to assess possible financial, economic or other consequences of the accession of the Republic of Uzbekistan to the LRTAP and its Protocols, which will certainly accelerate the process of accession of the Republic of Uzbekistan to the LRTAP and its Protocols.</p>
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