

**Convention on Long-Range Transboundary Air Pollution (CLRTAP)
61th session of the Working Group on Strategies and Review
(Geneva, 4-6 September 2023)**

**Draft 2024–2025 workplan for the implementation of the Convention:
policy-related aspects and elements**

Comments by the EU and its Member States

The EU and its Member States thank the WGSR Bureau, the task forces and the secretariat for the preparation of this draft work plan section.

To facilitate discussions during the 61st session of the WGSR, we provide the following advance comments. Text suggestions are provided with new text in **bold** and deleted text in ~~strike-through~~.

- The draft work plan has a large number of proposed items for TFRN while rather few proposed by e.g. TFTEI. Can the TFRN co-chairs confirm that the task force has realistic capacity to deliver on all these proposed activities in the next two-year period? Can the TFRN co-chairs propose a list of their prioritised items for consideration by Parties with a view to the limited Convention resources?
- On proposed work plan item 2.1.4 (expert group on cities policy brief), we stress that such a policy brief should not duplicate other work already done, e.g. within the JRC Urban Air Quality Atlas for the European Union, about to be published in updated version. The policy brief would be useful for informing about experiences and what *could be/has been* done, in the wider UNECE region (important that it does not focus on developments within the EU). It should refrain from recommendations on what *should* be done at local level as this would not be appropriate for an international convention (subsidiarity principle). The description in the draft work plan should be clarified, notably as “multiscale modelling” and “multilevel governance” are not the same. Text proposal (additions in bold, deletions in strike-through):

2.1.4	Promotion Use of multiscale modelling to inform regional and/or local air quality management for formulating effective measures and policies	Policy brief on multi-scale modelling multilevel governance	TFIAM	
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- On proposed work plan item 2.1.5 (condensables), we would like to receive more information about what is planned, how this discussion will be framed and on what basis it will be launched (document, proposal?). Also, how does it relate to proposed work plan items 1.1.1.4 and 1.1.2.3 of the draft science section work plan for discussion by EMEP SB? Our understanding is that the condensables ad hoc group under EMEP SB is dormant and the issue no longer on the agenda, notably following modelling results in 2023 showing that inclusion of condensables has no major impact on projected compliance with reduction commitments, so the science-based recommendation to include the condensable part of PM into inventories remains the best option for a fact-based approach.
- On proposed work plan item 2.1.6 (O3 modelling), we would like to receive more information about the policy analysis aspect of this work. As currently described, this appears to be a science based task, with overlaps with proposed work plan items 1.1.1.7 and 1.1.3.2 in the draft science section work plan for discussion by EMEP SB.
- Proposed work plan item 2.1.7. seems not to be related to the Air Convention but refers to activities already under way within the INMS framework. We reiterate that these frameworks are separate and that, while cooperation and synergies would be welcome, the activities, roles and responsibilities should not be mixed up. A proposal for the aspects of this item of relevance for the Air Convention work plan:

2.1.7	Publication and dissemination of Continued cooperation with and monitoring of the work within INMS on the International Nitrogen Assessment, including preparation of specific summary for Convention's policymakers identifying and highlighting Workshops with further analysis, including follow up to INMS Global Nitrogen Assessment report recommendations relevant for the Air Convention, and identification of most effective nitrogen measures.	Summary of Air Convention relevant messages for policymakers shared with WGSR and chapters available with open access	TFRN	With funding assistance of GEF/UNEP through INMS
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- On draft work plan item 2.1.10: similarly as with draft work plan item 2.1.7, the work on an existing INMS guidance does not seem to be Air Convention work scope but

should be done within the framework of INMS. We propose to either delete the reference from the Air Convention framework or rephrase as TFRN cooperation with INMS on this INMS initiative to update their guidance.

- On draft work plan item 2.1.12: please explain how this additional information document would provide added value and new information to complement the already existing documents, draft guidances and reports on measures to reduce nitrogen pollution.
- Proposed work plan item 2.2.1. should also refer to TFICAP to implement promotion of guidance documents outside the UNECE region.
- Proposed work plan item 2.2.2. should be considered a placeholder, to be confirmed once there is more clarity on the way forward on the Gothenburg Protocol. Should there be interest in changing the role/format of the technical annexes, this would also affect the role of the technical guidance documents and a future update may need to take this into account (possible bigger revision of the guidances, should such amendments be discussed).
- We would like more information about the proposed item 2.2.4. and its added value compared to the recent integrated nitrogen management guidance document. It is not clear that such a possible future framework code would be needed or useful, notably considering the current financial situation with limited secretariat and Convention resources. We may need to be restrictive regarding launch of new framework codes and guidance documents unless there is a very clear justification and/or commitments by Parties to pledge sufficient extra budgetary resources.
- Item 2.2.6. should not specify where possible co-funding might come from, there is no confirmation of EU funding for this activity at this point in time. The work plan language should be kept more open.
- On work plan item 2.2.8: please delete (or explain) the reference to “expected expansion of TFRN mandate to include agricultural CH₄ emissions”. Such expanded mandate has not been announced/decided and would only be up for discussion following decision on the way forward on the Gothenburg Protocol. This draft work plan item could be down-prioritised as there is already a draft guidance on this topic under preparation for EB43 (cf comment above about limited resources and need to be restrictive about the number of new guidance documents).
- On work plan item 5.1.1., we understand that the cost estimate is a proposal by the secretariat. Could the secretariat provide some more details on this estimate and what assumptions it was based on? It would also be useful to involve/consult the task force lead countries in proposals related to TFICAP outreach.