

Outcome of Brainstorming session on Policy Options Document and potential next steps

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Participants:	Georgia, Armenia, Azerbaijan, Türkiye, TFIAM, TFTEI, Secretariat
Reference:	TFTEI document: "Technological pathways in Serbia, Georgia, Kazakhstan, Moldova, Montenegro and Armenia"
Key messages	Much work is currently done within current non-Parties to facilitate further progress; POD is clear and considered useful; TFTEI case studies are considered very useful, to be expanded to other countries Substantial revision of GP is necessary to address barriers and enable further ratification; new and realistic approaches are needed for non-Parties; Further focus on capacity building is necessary Non-parties need to become actively involved in revision process;

Leading questions for open discussion

First round of questions

- [Comments and questions on the updated policy options document and its accompanying informal document: Missing information? Unclear information? Options not covered? Analysis incomplete? More focus needed on non-Parties? ...](#)
- [Views on the recommendations presented in the updated policy options document](#)

Georgia:

- No further comments on the POD; most elements are there; nothing is really missing;
- The document is helpful for non-parties to understand the potential ways forward
- Useful that there's a focus on capacity building and the challenges non-parties face; consider separate approaches for current non-Parties
- Recommendations are helpful and we hope that a way forward will be considered
- Without a revision of the Protocol text and annexes, there will be very little progress (progress towards ratification/implementation would otherwise continue at the same, slow pace; too many requirements and barriers);
- A substantial revision of the Protocol/annexes is needed to facilitate more ratification

Armenia:

- The POD is a comprehensive document, all necessary elements are covered, no further recommendations to be included in the document;
- Discussed POD with policy department in the Ministry of Environment
- Also discussed the work carried out by TFTEI on the Technological pathways analysis
- Working on similar topics (paths to ratification), lots of discussion internally on ratification of the Protocol;
- Not yet a potential EU candidate, but have a partnership agreement with the EU; important driver

Türkiye:

- Still dealing with sectoral emissions in Türkiye, further taking legal steps
- Revising some of the sectoral emission controls

- Further gathering information for our country - aiming to ratify in the mid-term - with view for net-zero emissions
- Still a ways away for ratification
- POD is very clear. No further recommendations on the document.

Azerbaijan

- No initial comments on the policy options document
- Need support and in particular technical assistance; workshops are useful, one planned on emission inventories in November
- Need to increase capacity;
- Seeking to increase legislative level (referring to EU directives);
- Would benefit of a stepwise approach: first an in-depth assessment of its situation, secondly preparation of and action plan / road map
- Azerbaijan would also welcome an analysis that TFTEI did for six countries already;
- Transport is a key sector (old vehicles on the road)
- Azerbaijan referred to the twinning report by EU "*Modernization of the National Environmental Monitoring System of Azerbaijan based on EU practices*": supporting development of AQ management and monitoring system; helped to raise institutional capacity

Technical Annexes

- TFTEI has developed case studies to explore the possible technological pathways toward the Ratification of the Amended Gothenburg Protocol (AGP), in 6 EECCA/WB countries (Armenia, Serbia, Montenegro, Moldova, Kazakhstan, Georgia)), including an analysis on barriers);
- The TFTEI analysis is considered as very helpful in understanding and setting a roadmap
- All six countries are working to develop their legislative frameworks to integrate some EU directives. Most have association agreements with the EU;
- Progress is different between EU candidate countries (where association agreements are a key driver for implementing environmental legislation) and others;

Question on which annex is considered the most complicated?

- Annex VI; could benefit of some simplification
- One example of an activity not covered by the association agreements, but covered in Annex VI of the AGP is stage 2 recovery (vapour recovery at service stations); stage II is not yet taken into account in most countries (except for Serbia); In association agreement with Georgia, only stage I is covered (not Stage II)
- Legislative frameworks have not started on Stage II;
- Lots of information on ELVs for large combustion sources - difficult to gather precise information on different sources.
- Technical annex on mobile sources is very focused on EU standards, while Georgia and Armenia indicated large imports of second hand vehicles from different parts of the world (EU, US, Japan, ..); complying with Annex VIII is difficult (complying with Euro standards is difficult; alternative is putting age limitations in place)
- Georgia: EU accession agreements are the main driver for progress in our country - so differences with the Protocol matter.
- Conclusions:
 - This information is helpful in order to avoid ratification barriers;
 - Places where the annexes are out of step with key drivers like EU accession agreements can be additional barriers that keep countries from ratification;
 - Potential areas/examples we can consider fixing in the technical annexes;

Second round of questions

- Option(s) that seem most appropriate/feasible based on the information and analysis in the updated policy options document and according to your current understanding (from an expert perspective)?
- Feasible trajectory/pathway (time horizon) for further action as follow up to the conclusions of the GP review?
- What is key for EECCA/WB countries to make a GP revision or alternative action a future success?
- Views on (additional) action on CH₄, BC and NH₃?

Georgia:

- Without substantial revision of the Protocol and its annexes, it will be almost impossible to ratify and implemented the existing amended GP.
- Very heavy/difficult for Georgia to fulfill all the requirements currently in place at once. Existing flexibilities are insufficient. Without revision, not expecting any new parties to ratify.
- The current flexibilities are not sufficient.
- A revision of the protocol is needed to adequately address current barriers and numerous requirements.
- Non-parties need to be much more active in the revision process. Need to find some way to activate other colleagues - even participation in this meeting shows that there is little interest in becoming parties to the GP. Missing some incentives or awareness. Need to raise awareness with colleagues of non-parties.
- Step by step ratification (ratification of annex by annex) and/or a restructuring of the annexes is also needed;
- A ratification sector by sector is most feasible for Georgia as this is how we work (
- For all pollutants (except sulfur), we work sector by sector (meaning could address multiple pollutants, but by sector);
- Should be possible to ratify step by step; ratification by sector (ratify next one as feasible)
- Covering all the issues at once for our country is extremely difficult;
- Phased approach is much more realistic and feasible.
- Concrete plans for each individual country need to be developed - show realistic plans of when countries can ratify for each sector and the steps to get there. Focus first on key sources/sectors.
- Absent this analysis, national planning will be very difficult to make progress towards ratification. Countries are in really different places for each sector.

TFTEI

- Have done the technological pathway analysis for six countries, could do for more, will depend on what's in the work plan.
- This analysis is needed if we want to develop individual plans for countries.
- Started with emission inventories for SO₂, NO_x, PM. Not VOC or ammonia yet. TFRN could do some analysis on ammonia.
- If you look at a large commercial plant, you won't just address NO_x or SO₂ only, you will look at it comprehensively.
- There are a lot of old installations, old power plants - today it's difficult to know whether to retrofit old plants or to build new ones, also in relation to CO₂ emissions; retrofitting can be quite expensive
- Most important industry/sector are different from country to country
- In the GP, don't have all activities covered.

Armenia:

- Partnership agreement since 2017. Based on this agreement, which has been in force since 2021, six directives regarding GP are involved.
- Armenia is very actively working on implementation to integrate these directives into national legislation
- In July, started process for industrial emission with support from experts from Czech Republic and Italy.
- TFTEI analyzed technological pathway. Helpful for us to better understand our situation.
- For us, industrial sector is not a problem because we do not have a lot of industrial processes.
- Issue will be cement production.
- Will introduce necessary legislation;
- Other problems are fuel and mobile sources - all cars are imported, fuel from Russia.
- Have an agreement with Russia/other countries - regulations are based also on this agreement.
- EU agreement does not cover fuel. Regulation states it will be based on Russian regulation.
- Based on socio-economic situation, not possible to follow Euro-6 requirements.
- Stage by stage approach to ratification is also suitable for Armenia. We see places where we could make progress first, and then we can turn to other areas where we can work to improve our legislation. Stage by stage is important to allow us to even start to make progress - to do it all at once is not motivating, but it is motivating to make progress step by step - once we start, we will keep going.
- Revision to the GP is necessary so that Armenia and other countries could make progress and not be left outside the door.
- Can make a roadmap for ratification/implementation based on the technological pathway analysis - which year, which step. Will be helpful for us to develop a ratification/implementation plan.
- Process for ratification should not be long - implementation can be longer.

POD describes two options: (1) staged ratification (ratify annex by annex), or (2) phased commitments in the protocol you have stages, where you ratify at once and then over time implement increasing obligations. Drawback of (2) could be that a party would only ratify if they are sure that they can meet the requirements by 2030, 2040, so could inhibit progress. But, to avoid a complicated ratification process (ratification in stages), it could be useful to examine the possibility to build in a process where a country could ratify the protocol and then at a later stage opt in/out and say they will now comply with X technical annex, something like the expedited procedure. Need an approach that will allow parties to ratify quickly but also to avoid commitments that are too far out (not committing to all TA at once). Something we should further explore next year - what would work best for your country?

Armenia:

- Need to go through in more detail with our government to understand which of those approaches would be best for Armenia
- Same challenges with the EU agreement.
- Roadmap would be helpful. First accession then thinking about implementation to meet those requirements.

Georgia:

- Ratification process is time-consuming.
- Will be difficult to agree on the timescales for each sector at once.

TFTEI

- Necessary is to have legislative framework in place to ratify the Protocol - not necessarily that all plants are already in compliance.

Conclusion

- A focus on industrial facilities could potentially be a first step.

Türkiye

- Not lots of additional comments.
- Need to evaluate further.
- Technical and scientific studies are still ongoing. Still gathering information.

Views on additional action on methane, black carbon, ammonia? Some interest to strengthen existing measures or expand the scope of ammonia for example. In current Protocol, we have soft provisions on black carbon (voluntary reporting), should we focus more on BC?

Georgia:

- Ammonia: sensitive issue in Georgia. Most of our agriculture is small/individual/residential activities. Few big farms and those are much easier to regulate - we are working on that. For big farms, could agree to mandatory action on ammonia. For small/household farms, would be more difficult. Threshold matters.
- For BC and methane - understand these are important pollutants for PM, ozone. Addressing them should not barrier ratification. Countries that are ready to tackle these pollutants should move forward; no detailed specific views yet on these issues
- If there is a revision of the Protocol and opportunity to cover sector by sector, these pollutants could be included in the sector regulations, which could be more feasible for us. Difficult to say what kinds of regulations would make sense to control those pollutants.
- Open to discussing measures on BC, methane.
- Understand methane would be covered mostly under the agricultural sector, where CH₄ could be addressed in a synergetic way with NH₃.
- If we do by sector, could do common activities to address ammonia and methane.

Armenia:

- Also don't have large farms, mostly household scale. Do not have regulations for this specifically.
- We have information on methane, ammonia, BC.
- Black carbon - not a real issue for Armenia. We don't have companies that emit BC. Do have wood burning.
- Can't speak to whether we could support mandatory thresholds for ammonia or not - don't understand yet how we would measure or control that.
- For pig farming, possible, but more difficult for household level.
- Methane is a sensitive issue.
- Think introducing mandatory measures on methane could be a barrier for ratification - would make it more difficult. Easier to ratify for sectors where we already have some kind of existing regulation.
- Too early to be too specific on ammonia, BC, methane.

Turkiye:

- Still working on PM regulation, keeping in mind additional requirements on BC.
- Nothing additional to add on methane, BC, ammonia.

Georgia:

- On the emission reduction commitments, the current base year (2005) is too far in the past: prevents us of setting ERCs; we need a different (more recent) base year; potentially averaging over more years.