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l'Union européenne

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#### NOTE D'INFORMATION

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Origine: Secrétariat général du Conseil  
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Objet: Convention sur la pollution atmosphérique transfrontière à longue distance  
Soixantième session du Groupe de travail des stratégies et de l'examen  
(WGSR 60)  
(Genève, 11-14 avril 2022)  
– Déclarations de l'UE et de ses États membres

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Les délégations trouveront en Annexe, pour information, une compilation des déclarations faites au nom de l'Union européenne et de ses États membres lors de la réunion susmentionnée.

**Convention on Long-range Transboundary Air Pollution**  
**Sixtieth session of the Working Group on Strategies and Review (WGSR 60)**  
**(Geneva/hybrid, 11-14 April 2022)**

**- Statements by the EU and its Member States -**

**Intervention in reply to statement by Ukraine on recent developments**

At the outset, let us express the EU's and its Member States' full solidarity with Ukraine and the Ukrainian people.

In the interest of precious session time, we will not repeat what has already been said. However, we agree with the US, CAN and UK and condemn in the strongest possible terms Russia's unprovoked and unjustified act of aggression against Ukraine.

Russia also needs to stop its disinformation campaign.

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**Item 3. Progress in the implementation of the 2022-2023 workplan**

**On the TFTEI report**

The EU and its Member States thank the Task Force for its report and take note of the progress in implementing the work plan.

**On the TFRN report**

The EU and its Member States thank the Task Force for its report and take note of the progress in implementing the work plan. We note that the report is not very detailed and that information about some key activities, notably the expected inputs to the GP review, might be missing.

We acknowledge that ammonia emissions, concentration and deposition have shown only a moderate decline over the last 15 years and that further efforts will be required in Europe as well as in other ECE regions in order to ensure a significant decline. To this end, the EU and its Member States thank the TFRN for presenting their "Top Five" priority areas for ammonia emission abatement.

We note the many references to cooperation with the INMS platform under UNEP. Opportunities for benefitting from the INMS work to avoid duplication of tasks might be interesting to consider further, following the finalisation of the GP review.

We thank you for the information about the ongoing process, but we still urge the task force to speedily finalise the analysis of the responses to the ammonia codes questionnaire for timely inputs to the GP review process and for sharing of results with the Convention Parties as soon as possible.

Regarding work plan item 2.2.1 *Analysis of the interactions between emissions of methane and ammonia, and other nitrogen compounds*: it has been marked in the written report as pending because of lack of resources. This is however an important analysis task which should be prioritised. We would like to hear from the Task Force about their analysis of the resource problem and the options for taking the issue forward as soon as possible, e.g. by the co-chairs and/or via one or several of the task force expert panels, notably as we understand that TFTEI stand ready to contribute.

#### **On the TFICAP presentation**

The EU and its Member States welcome the presented progress.

#### **On the Cost of inaction report**

The EU and its Member States thank the Task Force for the revised report on the cost of inaction. We are pleased to see that most of the comments we submitted on the report have been integrated in the new version. As mentioned, we have submitted additional comments in writing before the session and thank you for taking them into account. With these changes, we agree with forwarding the report to the EB42 for finalisation.

This report and its conclusions will be useful and could be largely promoted to raise awareness on the need for action for air quality, both within Parties, and for non-Parties, including via TFICAP activities.

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#### **Item 4. Review of sufficiency and effectiveness of the Protocol to Abate Acidification, Eutrophication and Ground-level Ozone.**

##### **a) Preparation of the draft report on the review of the Gothenburg Protocol**

The EU and its Member States welcome this new draft of the review report. We much appreciate the work done by all involved experts and groups. We have sent some written inputs which we hope will be of help for the GPG in their continued drafting.

##### **General comments**

The outline of this morning from the Task Force indicating progress on answering their review questions was helpful. It would be useful to get a complete overview table showing what review questions have now been answered.

Looking ahead, we have some comments on the potential way forward for starting to draw conclusions from the review report, and for prioritising discussion time on conclusions in the informal Head of Delegation and EB meetings. Several of the review report sections refer to measures that could be promoted and tools or guidance that could already be developed within the existing GP framework (via the normal work plan or via separate stand-alone EB decisions). We propose that these items could be identified and marked as potential candidates for separate follow-up action / conclusions (e.g. the references to EMEP/EEA guidebook developments in paragraph 16; dynamic modelling tools in paragraph 33; regular updating of guidance documents in paragraph 53; sector and integrated multi-pollutant multi-effect approaches in chapters VIII and XIV, respectively; the integrated nutrient management approach in paragraph 94). This would help clarify what items remain for the EB42 discussion on the future of the amended Gothenburg Protocol and what items may be pursued on a parallel track after the closing of the review, to help the sorting exercise.

Regarding chapter IV, it becomes obvious that available data is not always comparable between parts of the ECE region (different definitions, different timelines, etc.). Work on comparability and availability of data might be an interesting priority for the upcoming new science strategy and related discussions.

A key conclusion of the review will be the assessment of the adequacy of the current emission reduction commitments and other protocol obligations for reaching the protocol objectives. The draft review report does not yet include information on this analysis. We urge the involved science groups to develop the scenarios and analysis at the earliest possible time; and if possible, to already share any preliminary findings with the Parties.

We note the information in section VI A that there is an implementation problem and that additional policies and measures are needed in some Parties and for some pollutants to ensure meeting the emission reduction commitments. This does not necessarily reflect on the adequacy of the protocol obligations but may raise questions about a need for stricter enforcement and/or more detailed guidance or information-sharing to Parties on cost-effective abatement measures. We also note in paragraph 40 the positive momentum generated by the emission reduction commitments for clean air action and impacts in many Parties.

Finally, the challenges linked to transboundary pollution from emission sources outside the ECE region will likely not be possible to tackle through a revision of the current protocol. These issues will probably require parallel work tracks; notably as stressed in paragraph 87 by exploring the role of TFICAP, as appropriate.

## **b) Flexibilities and barriers to ratification**

We thank the GPG for drafting and presenting this useful summary note.

We reiterate our strong interest in facilitating ratification and supporting the progress by the Convention Parties not yet Party to the amended Gothenburg Protocol; notably by capacity-building and other support. A first priority would be to ensure that the minimum obligations of the protocol can be achieved by as many Parties as possible, supporting the protocol objectives of reduced air pollution. We are also open to looking into ways of reducing unnecessary complexity and/or considering new options or approaches to ratifying and implementing the protocol, as possible and appropriate with regard to legal considerations and with due consideration of the objectives of the protocol.

We support the proposal to prepare an informal document with a clear categorisation of the barriers identified so far together with possible solutions. This should be a priority issue to be discussed during the thematic session planned for September 2022. Notably, on the “new options and/or other different flexibilities” (as recommended in e.g. paragraph 7b) - this will not be possible to assess or discuss before we have a better understanding of the barriers to ratification (paragraph 7c) and clarity on whether the main barriers are in the design of the protocol or rather in the lack of resources or information.

On the draft paper, we have submitted written comments in advance of the session.

### **On the upcoming thematic session**

This event will be highly important and we strongly urge all delegations, notably those not yet Parties to the amended Gothenburg Protocol, to take active part and make their opinions heard both now and in that meeting. The priority for the work and discussions should be to clarify to what extent the *technical annexes* provide the main barrier; or whether the main barriers are also/primarily linked to the protocol main obligations or rather linked to external aspects such as lack of funding/knowledge/resources. Without that understanding, it will be difficult to move forward in discussing any options for solution.

### **c) Synergies with other policy areas**

The EU and its Member States thank the GPG and the Task Force for the drafting of the paper on air-climate synergies.

We take note of the strong and convincing case made for addressing air and climate issues with an integrated approach, notably given the relevance of methane as an ozone precursor and the challenge of achieving the more ambitious new WHO guidelines without exploring the air-climate synergy opportunities.

The note includes some references to EU policies and legislation without an explanation as to how these examples relate to the Air Convention and to the Gothenburg Protocol review (e.g. paragraph 3, 18). For the continued discussions we propose to focus specifically on the Gothenburg Protocol issues and the analysis of relevance for this review.

If the paper will be rewritten, we may want to submit more detailed written comments.

### **On the methane policy options paper**

The EU and its member states also thank the GPG for preparing the informal paper on potential options for addressing methane as an ozone precursor under the Air Convention.

We agree, as set out in the paper, that WGSR should for now take note of the options presented.

We look forward to participating in further work on this important issue under the review and to assessing the appropriate “next steps” for addressing methane as an ozone precursor.

#### **d) Development of emission scenarios, including for regions outside the United Nations Economic Commission for Europe Region, to explore the mitigation potential;**

The EU and its Member States thank the involved task forces for the presentation and may make use of the announced possibility for Parties to comment on the proposal in writing after the WGSR session.

#### **e) Emission limit values, technical annexes and guidance documents of the Protocol;**

The EU and its Member States thank TFTEI and TFRN for their useful work on the review of annexes.

We note that many of the preliminary findings in the draft review report refer to the technical annexes, found to be out-dated. We think that this is acting as a barrier to ratification.

The EU and its Member States agree that many techniques have improved since the adoption of the Protocol and that some emission limit values are outdated. However, as those techniques will hopefully continue to improve, simply updating emission limit values in the technical annexes might not be a lasting solution. Other tools and instruments could also be considered.

Before looking into the potential proposals for technical annex updates, we would therefore like to raise for further discussion the overall usefulness and relevance of the current technical annexes and the potential other options available to address the situation. Simply updating ELVs in the current technical annexes is not necessarily the most efficient way forward, in particular with a view to the ratification barriers discussion.

Specifically on Annex IX, it would be useful to gather and present assessment of options for consideration by the Parties, including assessment of impacts, pros and cons including in terms of ratification barriers. Such background information should help the Parties make an informed decision in next steps, depending on the conclusions of the protocol review. At this stage, we will however not commit to any option or conclusion.

**f) Policy implications of reporting of the condensable part in particulate matter**

The EU and its Member States thank the EMEP SB chair for the report on progress. We reiterate the importance of a structured approach to discussing the science questions on condensables, to support the upcoming policy discussions that will need to take place among Parties.

We thank the ad hoc group for the proposed roadmap outline. Some clarity might still be needed on the expected work and outcome of the ad hoc group.

We emphasise again that the only policy decision made on this matter so far is to recommend the inclusion of condensables *for the purpose of atmospheric modelling* and to urge Parties to provide information on whether their emission inventories for the residential heating sector include condensables (and if so, based on what methodology): the in-depth 2022 inventory review of the RWC sector and condensables as mentioned in the presentation will be useful to that purpose.

We note that a scenario aiming at including condensables in inventories would raise important questions linked to compliance and policy implications that are not yet solved: therefore, we recall that science discussions cannot and should not pre-empt the policy decisions still to be made. We also note there are still outstanding issues on what updates will be included in the next inventory guidebook in 2023.

Finally, we may want to send written comments on this proposed roadmap outline after the WGSR as we had no time to assess it in depth yet.

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**Item 6. Financial requirements for implementation of the Convention.**

The EU and its Member States thank the EB Bureau and the Secretariat for this preliminary work to assess the needs for an extra WGSR next year.

We thank Germany for providing an associate expert in the Convention secretariat through the Junior Professional Officers Programme. This will provide the secretariat with the staff resources to organise an additional meeting of the WGSR in 2023.

Conference costs still need to be covered for this extra meeting: we therefore encourage Parties to make ear-marked voluntary contributions, which seems the easiest and safest way to proceed to arrange a second WGSR in 2023. We also propose that the secretariat assists Parties in coordinating these contributions and we ask the secretariat to circulate more detailed information on the practical arrangements and timing requirements for collecting these extra-budgetary resources for an additional WGSR.

We would like to reiterate the need for the EB Bureau and the secretariat to analyse in depth the overall resource gaps, and the possibility to tighten costs or reshuffle existing staff resources, in order to define the financing requirements in the short and long term and the available options to address the situation. We urge the EB Bureau to finalise their analysis in consultation with all Parties and in good time to enable discussions at EB42.

**Item 7. Review of the rules of procedure for sessions of the Executive Body.**

The EU and its Member States take note of the information on the state of play of this group and welcome the appointment of Eduard Dame as the ad hoc group chair.

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