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Views on the review of the Gothenburg Protocol and expectations on a revised Protocol

Submitted by the European Environmental Bureau (EEB) to the fifty-eight session of the Working Group on Strategies and Review, to be held in Geneva 26-29 May 2020.

In December 2019 the Executive Body decided to start the review process of the 2012 Gothenburg Protocol, and by decision 2019/4 it invited Parties, subsidiary bodies, observers and other interested groups and organizations to submit views before 15 March 2020 on additional elements to be considered in that review.

The 2012 Gothenburg Protocol sets binding national caps for five air pollutants (SO₂, NO_x, NH₃, NM-VOCs and PM_{2.5}), to be achieved by 2020. However, already at the time of signing the amended Gothenburg Protocol in 2012, it was clear that the national emission reductions commitments for 2020 were inadequate to achieve the Protocol's objective of reducing air pollutant emissions to ensure that atmospheric depositions or concentrations do not exceed the critical loads and critical levels¹.

The European Environmental Bureau (EEB) underlines the importance of arriving quickly to a decision to revise and strengthen the Protocol. A revised Gothenburg Protocol shall:

- Continue to be based on the **multi-pollutant and multi-effect** approach;
- Introduce a long-term vision of **zero-pollution**;
- Set a clear objective that emissions of air pollution – by 2030 at the latest – come down to levels that provide a high level of protection for health and the

¹ Annex I of the Protocol describes the critical loads and critical levels, including critical loads for acidity and nutrient nitrogen (eutrophication) and critical levels for ozone, particulate matter and ammonia. According to Annex I, the critical levels for health impacts of ozone and PM_{2.5} are determined in accordance with the World Health Organization (WHO) air quality guidelines.

environment, i.e. **no exceedance of the World Health Organization's guidelines for health protection and no exceedance of critical loads and levels for environmental protection;**

- Elaborate new national Emission Reduction Commitments (ERCs) for 2030 and future years with the help of integrated assessment modelling that uses **emission scenarios based on up-to-date projections of energy use and activity levels that are compliant with the Paris Agreement**, i.e. where emissions of greenhouse gases are reduced to levels that are needed to secure that global warming stays below 1.5°C;
- **Establish binding national ERCs for 2030, as well as indicative national ERCs for 2035 and 2040**, that are needed to move towards the zero-pollution vision;
- Expand the number of air pollutants covered by binding ERCs from the current five to eight, by **adding methane (CH₄), black carbon (BC) and mercury (Hg)**. The need to ensure further reductions in methane and black carbon are highlighted repeatedly in the Convention's Long-Term Strategy for 2020-2030. In order to further reduce mercury exposure, it is necessary not only to apply emission limit values for various source sectors (such as coal power plants) but also to ensure that the total emissions of mercury are reduced, and this can be done by establishing binding ERCs.
- Include **mandatory technical annexes that set binding minimum requirements** (e.g. emission limit values and emission abatement measures) for the main source-sectors. Examples of "laggard" source-sectors that are mentioned in the Long-Term Strategy are agriculture, residential solid-fuel burning and international shipping.
- Focus on achieving further **significant reductions in agricultural emissions** of ammonia and methane;
- Include a **mechanism for review and revision**, so that the indicative national ERCs for 2035 and 2040 are reviewed/revised and made binding by 2030 and 2035 respectively at the latest;



- **Remove the current adjustment procedure and the three-year averaging option.** The Long-Term Strategy says that the review “should also include a reflection on the flexibility provisions included in the amended version of the Gothenburg Protocol and their effectiveness.”

Clearly there are close and important links between air pollution policies and climate policies. Reducing fossil fuel combustion through improvements in energy efficiency and increased use of less - or non - polluting renewable energy sources will result in significantly lower emissions of SO₂, NO_x and PM, as well as cutting emissions of the main greenhouse gas, carbon dioxide.

Not only will the implementation of necessary climate policies help to achieve air quality targets. The significant co-benefits from air pollution reductions also help to motivate a much higher level of ambition for climate policy, as well as a higher share of domestic carbon dioxide reductions.

The gravity of the current air pollution situation calls for a revised Gothenburg Protocol that establishes a very high level of ambition. It is not acceptable that air pollution will continue to cause several hundreds of thousands of premature deaths among European citizens each year, and that millions of hectares of sensitive ecosystems will still be exposed to pollutant depositions in excess of their critical loads and levels.

For more information:

Margherita Tolotto, EEB
margherita.tolotto@eeb.org

Christer Ågren, EEB
christer.agren@airclim.org