

**EMEP Steering Body to the Cooperative Programme for Monitoring and Evaluation of
the Long-range Transmission of Air Pollutants in Europe
15-17 September 2014**

Concerning Item 5 of the provisional agenda “**Adjustments under the Protocol to Abate Acidification, Eutrophication and Ground-level Ozone to emission reduction commitments or to inventories for the purposes of comparing total national emissions with them**”

Findings of the review team for Belgium

1. ERT undertook a full and thorough assessment of Belgium’s application for an adjustment to its nitrogen oxides (NO_x) emissions inventory for 2010–2012 for the Energy sector (Nomenclature for Reporting (NFR) source category 1 A 3 e). ERT concluded that Belgium’s application for an adjustment to emissions from the Energy sector does not meet all the requirements laid out in Executive Body decision 2012/12. In particular, ERT notes that this application is not based on one of the three circumstances listed in paragraph 6 of decision 2012/3. Emissions from gas pipeline compressors cannot be considered as a new source. An emission factor is included in the EMEP/CORINAIR Atmospheric emission inventory guidebook 2000.4 Therefore, ERT recommends that the EMEP Steering Body reject this adjustment application.

2. ERT undertook an assessment of Belgium’s application for an adjustment to its NO_x emissions inventory for 2010–2012 for the Road transport sector (NFR source categories 1 A 3 b i-iv). Belgium provided information to support its application for this adjustment. During the review, ERT requested additional information from Belgium, in particular, documentation that would make it possible to distinguish the impacts of the revision of the respective emission factors (EFs) from the impacts of other methodological changes introduced in the inventory. The Party indicated that it was able to provide the requested documentation; however, the resources available to ERT did not allow the review of this additional detailed documentation to be completed within the prescribed timescale. Within the available resources and time constraints, ERT was not able to determine whether the application meets all of the requirements laid out in decision 2012/12. Therefore, ERT recommends that the EMEP Steering Body assign an “open” status to this adjustment application, and arrange for further review work on the application in order to conclude whether the application should be accepted or rejected.

3. ERT undertook a full and thorough assessment of Belgium’s application for an adjustment to its NO_x emissions inventory for 2010–2012 for the Off-road mobile machinery sector (NFR source categories 1 A 2 f ii, 1 A 3 d i (ii), 1 A 3 a i (i), 1 A 3 a ii (i), 1 A 4 a ii, 1 A 4 b ii, and 1 A 5 b). ERT concluded that Belgium’s application for an adjustment to the Off-road mobile machinery sector does not meet all of the requirements laid out in decision 2012/12. In particular, ERT notes that this application is not based on one of the three circumstances listed in paragraph 6 of decision 2012/3. The NFR source categories in question were already included in the Regional Air Pollution and Simulation (RAINS)⁵ model used for deriving the 2010 national emission ceilings, and therefore cannot be accepted as new emission sources. Therefore, ERT recommends that the EMEP Steering Body rejects this adjustment application.

Answer from BE to the EMEP SB

Belgium disagrees with the observations of the review team. Decision 2012/3 states in article 6 that the circumstances under which an adjustment could be applied are extraordinary and fall into three broad categories where:

- (a) Emission source categories are identified that were not accounted for at the time when emission reduction commitments were set;
- (b) Emission factors used to determine emissions levels for particular source categories for the year in which emissions reduction commitments are to be attained are significantly different than the emission factors applied to these categories when emission reduction commitments were set; or
- (c) The methodologies used for determining emissions from specific source categories have undergone significant changes between the time when emission reduction commitments were set and the year they are to be attained;

For pipeline compressors is there some misunderstanding. Emissions from some off-road mobility sources were shifted from category 1A4aii to category 1A3e in the last submission round. Nothing changed on emissions from pipeline compressors. Belgium did not apply for an adjustment for the pipeline compressor emissions, but the discussion on the adjustment for 1A3e however is the discussion on off-road emissions. We do not agree with the rejected status for off-road emissions, as will be explained for off-road, including the off-road emissions in category 1A3e.

The adjusted emission inventory for road is based on the circumstance under Decision 2012/3 Article 6b, which was demonstrated by Belgium and was recognized by the review team. All necessary information on the calculation of the adjusted emissions was provided. The review team asked questions on the impact of the revision of the respective emission factors (EFs) and the impacts of other methodological changes introduced in the inventory. Clarifications were given by BE to point out the impact of changing emission factor in the inventory. Belgium clearly showed that the adjusted emissions take only into account changing EF and no other methodological issues. This means that adjusted emissions from BE should have been accepted. The review team concluded that the additional information did not fully explain the impact on NO_x emissions. There are different ways to calculate the impact of changes in emission factors. Belgium chose one based on available methods and data. Since adjustment is a new matter, we can understand that the review team did not have enough time to go into all details. Therefore we can agree with an open status. However we believe that an open status for all adjusted inventories for road transport would be more appropriate since different ways to calculate adjusted emissions are possible and since none of these should be excluded by approving already some countries without having reviewed other ways in more detail.

For non-road, the review team notes that Belgium's application is not based on one of the three circumstances listed in paragraph 6 of decision 2012/3 since the NFR source categories in question were already included in the Regional Air Pollution and Simulation (RAINS) model used for deriving the 2010 national emission ceilings, and therefore cannot be accepted as new emission sources. Belgium does not agree with this argument. RAINS contained only two off-road sectors (other transport with 2-stroke engines (OT_LD2) and other land-based vehicles (OT_LB)), which correspond with 4 NFR categories. Other off road NFR categories were not taken into account in RAINS (2012/3, Article 6, circumstance a). BE calculates the non-road emission now in a very detailed way which was not available at the time the

emission ceilings were set. That more categories were taken into account since the ceilings were set, is also very clear in the GAINS model. GAINS takes into account 9 non-road categories (compared with only two categories in RAINS). Therefore Belgium cannot agree with the rejected status. Belgium is willing to provide more detailed information to demonstrate the differences in emission calculation in RAINS and the emission calculation in the current emissions models for non road sources.

Belgium is convinced that for all three categories the requirements for adjusted emissions are met. Since adjusted emissions are new, we can accept an open status and we are willing to give more information to help the review team.