



Mr. Marco Keiner
Director
Environment Division
ECONOMIC COMMISSION FOR EUROPE
Palais des Nations, Room CH.2111
Geneva 10

3 June 2013

Subject: Spain reply to CLRTAP on NO_x and NH₃ exceedances above GP 2010 ceilings

Dear Mr. Kiener,

As announced in our previous letter as of 28 February, in which Spain committed to provide by 4 June an updated assessment on the NO_x and NH₃ exceedances above Gothenburg Protocol 2010 emission ceilings, Spain is now pleased to provide such updated assessment having made use of the most recent background information and revised estimated procedures on this subject.

As you are aware, the figures on NO_x and NH₃ emissions as they appear in the February 2013 submission provided by Spain amounted in 2010 to 882.1 kt NO_x and 388.7 kt NH₃. These figures were above the respective 2010 GP ceilings in the following percentages: 4.1% for NO_x (ceiling of 847 kt) and 10.1 % for NH₃ (ceiling of 353 kt).

Nevertheless, in the course of the last three months, Spain has raised new background information and implemented updated procedures for NH₃ emissions re-estimation as well as implemented an 'adjustment' recalculation for NO_x reported emissions. The corresponding substantives reports on this NO_x 'adjustment' recalculation and NH₃ emissions re-estimation are provided in the respective attached files:

- Spain adjustment recalculation of NO_x emissions (May 2013).doc
- Spain reestimation of NH₃ emissions (May 2013).doc

According to these reports, the recalculated adjustment of NO_x and the re-estimation of NH₃ now compares with the previous February 2013 submission and with the respective GP 2010 ceilings as shown in the following two summary tables.

Table 1. – NO_x Emissions ceiling for 2010 and estimated emissions 2010-2011

		NO _x	
		(kt)	(%)
Ceiling for 2010		847	
<i>Edition</i>	<i>Year</i>		
2012 ed. (series 1990-2010)	2010	890.3	5.1%
2013 ed. (series 1990-2011)	2010	882.1	4.1%
	2011	915.4	8.1%
Re-estimation after provisional 'adjustment' (May 2013)	2010	759.1	-10.4%
	2011	804.9	-5.0%

Table 2. – NH₃ Emissions ceiling for 2010 and estimated emissions 2010-2011.

		NH ₃	
		(kt)	(%)
Ceiling		353.0	
<i>Edition</i>	<i>Year</i>		
2012 ed. (series 1990-2010)	2010	368.3	4.3%
2013 ed. (series 1990-2011)	2010	388.7	10.1%
	2011	380.6	7.8%
Preliminary re-estimation (May 2013)	2010	338.0	- 4.3%
	2011	331.3	- 6.2%

As it can be seen from both tables, the corresponding update figures in 'Re-estimation after provisional "adjustment" (May 2013)' for NO_x and 'Preliminary re-estimation (May 2013)' for NH₃ show now that Spain is in compliance with the GP 2010 ceilings for both the 2010 and 2011 inventory years.

Therefore consequently with the process followed to reassess the previously identified NO_x and NH₃ exceedances, the position that Spain wants now to convey is as follows:

- For NO_x, Spain asks for the opening of an 'adjustment' procedure that is based on the not achievement of the expected reductions of NO_x emissions that, when the GP 2010 emissions ceilings were established, were projected for the reduction of future Euro technologies of passenger cars and heavy duty vehicles in the road traffic sector. Please refer to the above mentioned report 'Spain adjustment recalculation of NO_x emissions (May 2013).doc' for the motivation of this petition of adjustment.

Spain asks for the implementation of the Inventory Adjustment Procedure (IAP) for NO_x emissions considering that the circumstance mentioned under paragraph 6 (b) of Decision 2012/3 apply to Spain in what concerns NO_x emission factors of passenger cars and heavy duty vehicles in road traffic..

- For NH₃, Spain presents a re-estimation of NH₃ emissions that, in comparison with the emissions reported in the February 2013 submission, have been revised taking into consideration the incorporation of the effect of abatement techniques in the agricultural sector related to the fertilizers application on agricultural soils. These abatement techniques were not included in the previous submission, having as an effect that the emissions reported in it were over-estimated as compared with the present re-estimation. Please refer to the above mentioned report 'Spain reestimation of NH₃ emissions (May 2013).doc'.

In conclusion, Spain provides this information to the CLRTAP Secretariat asking for it being passed to the Implementation Committee in order that the appropriate actions can be taken on the subject.

Yours sincerely,

Maj-Britt Larka Abellán

Subdirectora General de Calidad del Aire y Medio Ambiente Industrial