

Distr.

GENERAL

CEIP/Adjustment RR/2021/France

3/08/2021

English ONLY

Review of the 2021 Adjustment Application

France

Expert Review Team Report

Report title	Review of the 2021 Adjustment Application by France
Country	France
Report reference	CEIP/Adjustment RR/2021/ France
Date	03/08/2021
Version	Final v1

Expert Review Team

Role	Sectors	Name	Country
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Primary expert reviewer	Agriculture 3B, 3D	Tim van der Zee	NL
Secondary expert reviewer	Agriculture 3B, 3D	Nicole Mandl	AT
Basic checks (Step 1 and 2)	N/A	Katarina Mareckova	CEIP

Executive Summary

1. As mandated by Decision 2012/3 (ECE/EB.AIR/111/Add.1) of the Executive Body of the CLRTAP the nominated Expert Review Team undertook a detailed review of the adjustment application submitted by France. The review was undertaken on behalf of the EMEP Steering Body and following the guidance published in the Annex to decision 2012/12 (ECE/EB.AIR/113/Add.1) and 2014/1 (ECE/EB.Air/130).
2. Each sector of the application was reviewed by two independent sectoral experts during May and June 2021. The findings were discussed during the review week from 22-26 June 2020. The conclusions and recommendations for the EMEP SB are documented in this country report.

Table ES1: Summary Information on the Submitted Application

Reasons for adjustment application (Decision 2012/3, para 6)	Implementation of new emission sources that were not known when the ceilings were set.
Pollutant for which adjustment is applied for	NMVOc and NO _x
Sector/Pollutant for which adjustment is applied for	Manure Management (NFR 3B) and agricultural soils (NFR 3D)
Year(s) for which inventory adjustment is applied	NMVOc: 2010-2014 NO _x : 2010-2018
Date of notification of adjustment to the Secretariat	14 February 2021
Date of submission of supporting documentation	16.3.2021

3. The Expert Review Team reviewed and evaluated the documents submitted by France.
4. **NMVOc emissions from Manure Management (NFR 3B) and Agricultural soils (NFR 3D):** The ERT finds that these sources were not known at the time when the ceilings were set and thus constitute valid adjustments. The ERT finds that the emissions have been calculated in line with the EMEP/EEA Guidebook. Hence, the ERT is of the view that the application for adjustment meets the criteria as outlined in the Directive. The ERT therefore recommends that the EMEP Steering Body **ACCEPT** this adjustment application from France.
5. **NO_x emissions from Manure management (NFR 3B) and Agricultural soils (NFR 3D):** The ERT notes that NO_x emissions from manure management and agricultural soils were not included in the EMEP/EEA Guidebook at the time of setting the emission ceilings. The ERT finds that the emissions have been calculated in line with the EMEP/EEA Guidebook. Hence, the ERT is of the view that the application for adjustment meets the criteria as outlined in the Directive. The ERT therefore recommends that the EMEP Steering Body **ACCEPT** this adjustment application from France.

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1 Introduction and Context

6. Parties may apply to adjust their inventory data or emission reduction commitments if they are (or expect to be) in non-compliance with their emission reduction targets¹. However, in making an adjustment application, they must demonstrate that extraordinary circumstances have given rise to revisions to their emissions estimates. These extraordinary circumstances fall into three broad categories:

- a) Emission source categories are identified that were not accounted for at the time when the emission reduction commitments were set; or
- b) For a particular source, the emission factors used to estimate emissions for the year in which emissions reduction commitments are to be attained are significantly different to those used when the 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.

7. Any Party submitting an application for an adjustment to its inventory is required to notify the Convention Secretariat through the Executive Secretary by 15 February at the latest. The supporting information detailed in Decision 2012/12 must be provided (either as part of the Informative Inventory Report, or in a separate report) by 15 March of the same year.

8. As mandated by Decision 2012/12 and as amended by the Decision 2014/1 of the Executive Body of the CLRTAP, applications for adjustments that are submitted by Parties are subject to an expert review². Technical coordination and support to the review is provided by EMEP's Centre on Emission Inventories and Projections (CEIP). The members of the review team are selected from the available review experts³ that Parties have nominated to the CEIP roster of experts.

9. The Expert Review Team (ERT) undertakes a detailed technical review of the adjustment application in cooperation with the EMEP technical bodies and makes a recommendation to the EMEP Steering Body on the acceptance or rejection of the application. The EMEP Steering Body then takes its decision on any adjustment application based on the outcome of the technical assessment completed by ERT.

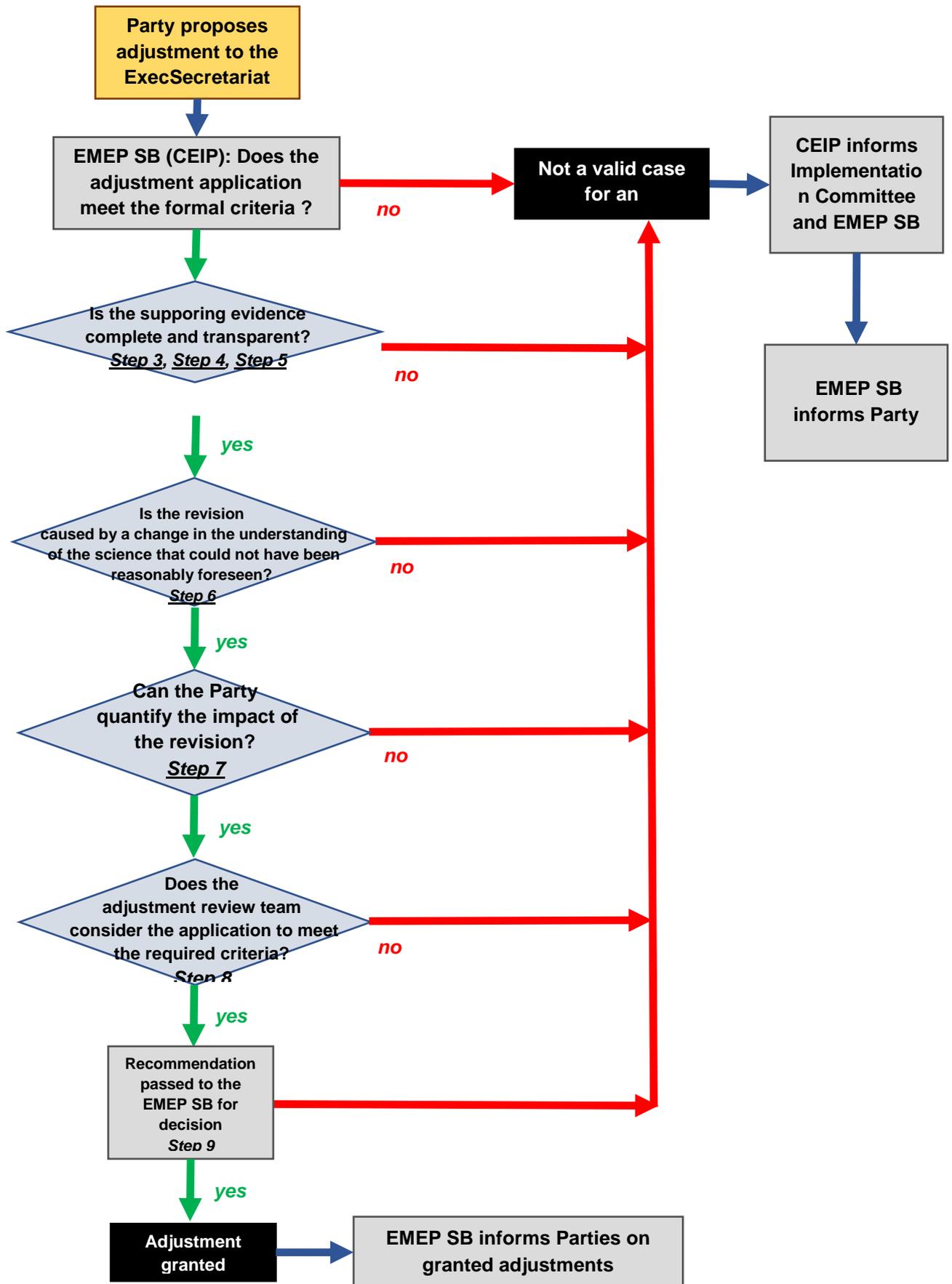
10. The flow diagram below outlines the different stages of the technical review. The following sections of this report are structured in the same way, and describe in detail the findings of the ERT at each of the decision gates in the process.

¹ Throughout this report the term "emission reduction commitments" is used. However, the term "emission ceilings" is equally applicable.

² The EMEP Steering Body, in conjunction with other appropriate technical bodies under EMEP, shall review the supporting documentation and assess whether the adjustment is consistent with the circumstances described in paragraph 6 of EB decision 2012/3 and the further guidance in EB decision 2012/12 as amended by EB decision 2014/1 and Technical guidance document ECE/AB.Air/130 ..

³ https://www.ceip.at/fileadmin/inhalte/ceip/3_review/0_roster_2021.pdf

Figure 1: Flow Diagram/Decision Tree for the Review of Adjustment Applications



2 Review of Submitted new Adjustments

2.1 Assessment of Formal Criteria

11. France notified the secretariat through the ECE Executive Secretary of its intention to apply for a new adjustment within the legal deadline on 15 February 2021. Limited supporting information requested by decision 2012/12 was provided as part of the Informative Inventory Report before the legal deadline of 15 March of the same year that it is being submitted for review by the EMEP Steering Body (decision 2012/12, annex, para. 1).
12. Additional information was provided during the review in response to requests from the ERT.
13. France does not comply with its NMVOC and NO_x emission reduction commitments listed in Annex II of the Gothenburg Protocol, (paragraph 1 of Decision 2012/3).
14. France provided information on the impact of the adjustment to its emission inventory, and the extent to which it would reduce the current exceedance and possibly bring the Party into compliance with its emission reduction commitments for the years 2010-2018 and 2010-2014 for NO_x and NMVOC respectively.

Table 1: Impact of adjustments on the NO_x and NMVOC emission inventories of France for the years 2010-2018 in ktonnes

<i>Pollutant</i>	<i>NFR</i>	<i>2010</i>	<i>2011</i>	<i>2012</i>	<i>2013</i>	<i>2014</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>	<i>2018</i>
NO _x	3B	-10,21	-10,08	-10,03	-10,09	-10,20	-10,26	-10,11	-9,96	-9,77
NO _x	3D	-61,13	-60,56	-60,95	-60,17	-61,71	-62,52	-62,71	-62,71	-61,95
NMVOC	3B	-202,75	-201,98	-200,25	-200,16	-203,60				
NMVOC	3D	-177,66	-185,61	-179,02	-181,27	-184,72				

15. France indicated that it meets the set ceilings for NMVOC in 2015 and for NO_x in 2019 in the supporting documentation in Chapter 11 of the IIR.

2.2 Assessment of the Quantification of the Impact of the Revision

16. The adjustment application process requires that the Party submit a quantification of the impact of the adjustment for which an application has been submitted. Table 1 provides an overview of the NO_x and NMVOC adjustment application of France in the Agriculture sector as provided by France in Annex II.
17. All adjustments have been justified with the explanation that these sources were unknown when the ceilings were set.
18. In accordance with Part 4 of Annex IV of Directive (EU) 2016/2284 (hereinafter the Directive), there are three circumstances, where an adjustment can be of relevance, i.e.:
 - a) Emission source categories are identified that were not accounted for at the time when the emission reduction commitments were set; or

- b) For a particular source, the emission factors used to estimate emissions for the year in which emissions reduction commitments are to be attained are significantly different to those used when the 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.

In case of a new emission source, the following information shall be provided:

- evidence that the new emission source category is acknowledged in scientific literature and/or the EMEP/ EEA Guidebook;
- evidence that this source category was not included in the relevant historic national emission inventory at the time when the emission reduction commitment was set;
- evidence that emissions from a new source category contribute to a Member State being unable to meet its emission reduction commitments, supported by a detailed description of the methodology, data and emission factors used to arrive at that conclusion.

19. The ERT is of the view that the application by France meets in general the criteria for the supporting documentation required by the Directive as listed above.

3 Assessment of Previously Approved Adjustments

20. France did not apply for adjustment in agriculture sector prior 2021.

21. The reviewers conducted an assessment of the adjustment of NO_x emissions from road transport (1.A.3.b.i–iv) for France, originally approved in 2015, mainly due to significant changes in emission factors. The adjustment was recalculated in 2021. The emissions were estimated using the methodology previously approved by ERT. Therefore, ERT concluded that there had been no change in the methodology that would alter the original approval of the adjustment and that the application met all of the requirements set out in Executive Body decision 2012/12 and in the Technical Guidance. Consequently, ERT recommends that the adjustment continue to be accepted.

4 Conclusions and Recommendations

22. The ERT has undertaken a full and thorough assessment of the application for an adjustment of the NO_x and NMVOC emissions inventory that was submitted by France for the source sectors listed in Table 1.

23. The review of the submitted application followed the guidance provided in the Annex to Decision 2012/12 of the Executive Body of the CLRTAP. The findings of the ERT are described in detail in Section 2 of this report.

24. Table 2 below provides a summary of the adjustment applications received from France, and the subsequent recommendations made by the ERT to the EMEP SB.

25. The ERT recommends the EMEP SB to accept new adjustment applications submitted by France.

Table 2: Recommendations from the ERT to the EMEP SB on new adjustments

Country	Sector	NFRs	Pollutant	Years	ERT Recommendation
France	Manure Management	3B	NO _x	2010-2018	Accept
	Manure management	3B	NMVOC	2010-2014	Accept
	Agricultural soils	3D	NO _x	2010-2018	Accept
	Agricultural soils	3D	NMVOC	2010-2014	Accept

26. The ERT recommends that NO_x adjustment in transport sector approved prior 2021 continue to be accepted.

5 Information Provided by the Party

27. Table 3 lists the information provided by the Party in its adjustment application. The information provided by Party can be downloaded from the CEIP website⁴.

Table 3: Information Provided by the Party

Filename	Short description of content
Annex_II_to_ECE-EB.Air130_Adjustment_Application_d	MS Excel file with detailed data underlying the proposed adjustment applications for: Manure Management (3B) and Agricultural soils (NFR 3D)
UNECE_France_mars2021_d	IIR 2021, pdf-document ; here especially: Chapter 11. Adjustments.
NotificationTemplate_CLRTAP_EMEP_emission_inventory_status_report_2021_FR	Word document
Annex_VII_Adjustment_FR_D_08-04-2021	Excel file
Annex_VII_Adjustment_complementary_info_1A3b_D	Excel file

28. The ERT found it necessary to ask the Party for further information. The information provided is described in Table 6 below.

Table 4: Additional Information Provided by the Party

Filename	Short description of content
Answers to questions set up by ERT	Excel file at "Clever space" - platform at Umweltbundesamt website

⁴ <https://www.ceip.at/gothenburg-protocol/review-of-adjustments>

References

Decision 2012/3 (ECE/EB.AIR/111/Add.1): Adjustments under the Gothenburg Protocol to emission reduction commitments or to inventories for the purposes of comparing total national emissions with them.

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/ece_eb.air_111_add.1_eng_decision_3.pdf

Decision 2012/4: Provisional Application of Amendment to the Protocol to Abate Acidification, Eutrophication and Ground-level Ozone

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/ece_eb.air_111_add.1_eng_decision_4.pdf

Decision 2012/12 (ECE/EB.AIR/113/Add.1): Guidance for adjustments under the 1999 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.

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/decision_2012_12.pdf

Decision 2014/1 (ECE/EB.Air/127/Add.1): Improving the guidance for adjustments under the 1999 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.

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/decisions/decision_2014_1.pdf

ECE/EB.AIR/130: Technical Guidance for Parties Making Adjustment Applications and for the Expert Review of Adjustment Applications, 14 April 2015

https://www.ceip.at/fileadmin/inhalte/ceip/4_adjustments/ece_eb_air_130_av_for_the_web.pdf

Data submitted by Parties applying for an adjustment:

<https://www.ceip.at/gothenburg-protocol/review-of-adjustments>

https://webdab01.umweltbundesamt.at/cgi-bin/adj_GP.pl

EMEP/EEA Air Pollutant Emission Inventory Guidebook 2019

<https://www.eea.europa.eu/publications/emep-eea-guidebook-2019>

2014 Reporting Guidelines (ECE/EB.AIR/125) for Estimating and Reporting Emission Data under CLRTAP

https://www.ceip.at/fileadmin/inhalte/ceip/1_reporting_guidelines2014/ece.eb.air.125_advance_version_reporting_guidelines_2014.pdf

The 1999 Gothenburg Protocol to Abate Acidification, Eutrophication and Ground-level Ozone

http://www.unece.org/env/lrtap/multi_h1.html