

EGTEI Stakeholder Meeting: Review of Draft Guidance Note on Best Available Technologies for Mobile Sources

Date	9 Oct 2014, 14-18 hrs	Date: 17 October 2014
Place	ENEA liaison office, Rue de Namur 72, Brussels (BE)	
Agenda	circulated 30 Sept 2014 – see attachment	
Documents	Draft Technical Report (circulated 30 Sept 2014) Draft Guidance Document (circulated 3 Oct 2014) Presentation slides attached to these minutes	
Participants	24 participants from various industries, national representatives and civil society	

The aim of the meeting was to gather feedback from the different stakeholders on our work for a new Guidance Note on Best Available Technologies for Mobile Sources in support of the Gothenburg Protocol of the UNECE Convention on Convention on Long-Range Transboundary Air Pollution (LRTAP).

The following points were raised by the participants:

- Questions were raised on the binding nature of the Guidance Document. It was pointed out that the application to apply BAT on mobile sources is not mandatory (“should” and not “shall”). The updated Guidance document will be a helpful tool for Parties to contribute to the necessary emission reductions required under the amended Gothenburg Protocol.
- The issue of Real Driving Emissions exceeding the Euro limits will not be considered in the Guidance Document, nor techniques to avoid tampering
- Non-technical measures cannot be considered at the same level as technical measures. Measures like inspection & maintenance schemes, fiscal measures, monitoring & enforcement schemes, or environmental zones are rather complementary. Hence they might rather be considered “good practices”.
- Current production vehicles have to comply with current emission limits. It is supposed that their emission controls are hence state-of-the-art. Therefore, the BAT Guidance should pay particular attention to technologies for reducing emissions from existing stock (“retrofit” in a wider sense) and similarly to non-exhaust emissions or non-road mobile machinery as necessary. One participant promised to provide additional information on the reduction of PM emissions from brake abrasion.
- In this context the already existing distinction was underlined and recommended to always clearly identify whether the specifications apply to existing or new vehicles. This distinction may become particularly relevant where add-on technologies could work even better or provide synergies like fuel economy benefits when integrated in the whole propulsion – after-treatment system, which of course is possible for newly built vehicles. Where necessary conditions for retrofit will also be further specified

(e.g. whether a certain after treatment works for Euro 5, but not or less for Euro 4, 3 and 2)

- Recommended to consider combined effect of several technologies acting on several pollutants while potentially offering cost advantages compared to separate technologies.
- Provide some more context to the current usage conditions of the reference technology as well as where current emission limit values would situate. The Technical report and GD will provide the necessary information to put the Euro standards / stages for new vehicles and NRMM in context, showing the most suitable techniques (BAT) to achieve these new emission limits (with also the necessary focus on engine measures which are less applicable to the existing stock).
- Consider enabling technologies for NH₃ capture. One participant promised to provide additional information on potential techniques for this.
- There was discussion whether the specific reduction percentages and control costs should also be summarized in the Guidance Document. As they form the basis for the ranking, it was decided to keep them in for transparency.
- A 1-page summary appeared very handy, but might be an over-simplification as limitations, trade-offs and synergies cannot be addressed.
- Prospective technologies should not be part of such a summary assessment as this might give misleading indications on uncertain developments.

Participants appreciated

- The comprehensive and still legible Technical Review and the approach taken therein;
- the approach taken for assessing BAT,
 - with explicit appreciation that costs together with the emission reduction potential of each technology are considered at the same footing;
 - the qualitative discussion of limitations, potential synergies and trade-offs;
 - a relative (and not absolute) ranking of technologies, considered robust also for regions with different cost structures.
- the structure by vehicle/machine categories is considered very useful;
- summary as presented in the draft Guidance document.
- that references for implementation of the technologies are given in each section.

General points beyond the specifications of BAT for mobile sources:

- BAT recommendations do not implicitly set new limit values, but give information on emission levels or performances that can be achieved with the application of BAT and as such complement the existing limit values. This is clearly distinguished in the text of the Gothenburg Protocol.
- Are the Gothenburg Protocol and its guidance documents only about reducing emissions or about reducing exposure?

The Gothenburg Protocol uses a two-track approach: a technology driven approach through the application of emission limit values and BAT, and an environmental driven approach through the imposition of national emission reduction targets. Both approaches support each other, but have an autonomous character in the Gothenburg Protocol. The technology driven approach of emission limit values and BAT guarantees a minimum level of playing field (in order to minimize distortions of the market). So, in essence the application of BAT is primarily about reducing emissions. Please also remember in this context that the Gothenburg

Protocol addresses the long-range transboundary air pollution in the UNECE region and was less designed to solve local exposure to air pollution.

Next steps:

Written comments are requested to be sent to IIASA & EMISIA by 24 Oct 2014.

Responses to all comments received will be circulated back to the participants and the EGTEI group.

Final documents are due end December 2014, submitted to the European Commission, DG Environment.

Further timeline:

It is envisaged that the final documents form the basis for a submission to EGTEI/TFTEI and further processing within the UNECE context. Most likely further stakeholder meeting(s) will be held. The envisaged submission to UNECE's decision making board is over/after Summer 2015.

For the minutes, 17 Oct 2014

Jens Borcken-Kleefeld