## **Chapter 11 - Adjustments and Emissions Reduction Commitments**

## **Emission reduction targets 2010 and Germany's compliance**

This section describes the 2010 emission reduction targets established by the original Gothenburg Protocol and the first NEC Directive. It transparently explains Germany's (non-)compliance and illustrates the use of adjustments. Later emission reduction targets for 2020 or 2030 are not covered here, since the assessment can only be made with 2020 data, available from 2022 onward.

	NO <sub>x</sub>				SO <sub>2</sub>				NMVOC				NH <sub>3</sub>							
NATIONAL E	MISSIO		NG	S															-	
Gothenburg	1,081				550				995				550							
NEC	1,051				520				995				550							
INVENTORY	DATA																			
	2010	2011		2018	2019	2010	2011		2018	2019	2010	2011		2018	2019	2010	2011		2018	2019
Inventory Total	1,724.1	1,691.9		1,435.3	1,344.4	456.1	439.4		302.2	273.3	1,367.6	1,278.6		1,129.8	1,126.1	620.3	626.1		602.9	588.4
<i>minus</i> 11.B - Forest fires	0.06	0.02		0.29	0.34	0.01	0.01		0.07	0.08	0.19	0.08		0.91	1.07	0.02	0.01		0.08	0.09
<i>minus</i> 1.A.3.a i - Cruise	107.08	103.77		139.77	139.51	5.98	5.75		7.35	7.29	1.46	1.36		1.62	1.58	1.21	1.16		1.49	1.48
<i>minus</i> 1.A.3.a ii - Cruise	8.44	7.77		8.35	8.43	0.44	0.40		0.41	0.42	0.58	0.57		0.44	0.46	0.09	0.08		0.08	0.09
<i>minus</i> 1.A.3.d i	137.59	135.81		76.36	59.38	44.25	43.98		2.58	1.97	3.99	3.92		1.80	1.75	0.03	0.03		0.02	0.02
National Total <i>for</i> <i>Reporting</i>	1,471.0	1,444.5		1,210.5	1,136.8	405.4	389.3		291.8	263.5	1,361.4	1,272.6		1,125.0	1,121.2	618.9	624.8		601.2	586.7
EXCEEDANC	ES OF S	ET EMIS	SS	ION CEI	LINGS															
against NEC	420.0	393.5		159.5	85.8						366.4	277.6		130.0	126.2	68.9	74.8		51.2	36.7
against Gothenburg	390.0	363.5		129.5	55.8						366.4	277.6		130.0	126.2	68.9	74.8		51.2	36.7
ADJUSTMEN	ГS		-										_					-		
	NO <sub>v</sub>				<b>SO</b> <sub>2</sub>				ΝΜΥΟΟ				NH <sub>3</sub>							
	2010	2011		2018	2019	2010	2011		2018	2010	2010	2011		2010					-	2010
National										2013	2010	2011		2018	2019	2010	2011		2018	2019
Total for Reporting	1,471.0	1,444.5		1,210.5								1,272.6						$\vdash$		
		1,444.5 300.74																$\vdash$		
<b>Reporting</b> minus NOx		300.74			1,136.8	405.4					1,361.4			1,125.0		618.9		$\vdash$		
<b>Reporting</b> minus NOx from 1.A.3.b minus NOx and NMVOC	296.11	300.74		179.62	1,136.8 144.77	405.4					1,361.4	1,272.6		1,125.0	1,121.2	618.9		$\vdash$		
Reporting minus NOx from 1.A.3.b minus NOx and NMVOC from 3.B minus NOx and NMVOC	296.11	300.74 1.50 117.07		179.62	1,136.8 144.77 1.40 110.66	405.4					1,361.4 296.79	1,272.6 297.13		1,125.0 297.86	1,121.2 295.83	618.9			601.2	
Reporting minus NOx from 1.A.3.b minus NOx and NMVOC from 3.B minus NOx and NMVOC from 3.D minus NOx & NH3 from 3.I - Storage of Energy crops minus NOx & NH3 from Energy crops residuals used in 3.D	296.11 1.53 114.12 0.16	300.74 1.50 117.07 0.19		179.62 1.42 114.10	1,136.8 144.77 1.40 110.66	405.4					1,361.4 296.79	1,272.6 297.13		1,125.0 297.86	1,121.2 295.83	618.9	624.8		601.2 3.20	586.7
Reporting minus NOx from 1.A.3.b minus NOx and NMVOC from 3.B minus NOx and NMVOC from 3.D minus NOx & NH3 from 3.I - Storage of Energy crops minus NOx & NH3 from Energy crops residuals used in 3.D National	296.11 1.53 114.12 0.16	300.74 1.50 117.07 0.19 IE in 3.E	  	179.62 1.42 114.10 0.17	1,136.8 144.77 1.40 110.66 0.17	405.4	389.3		291.8	263.5	1,361.4 296.79	1,272.6 297.13 9.03	· · · ·	1,125.0 297.86	1,121.2 295.83 8.56	618.9 3.04 37.27	624.8 3.45 46.75		601.2 3.20 54.63	3.20

	NO <sub>x</sub>		SO <sub>2</sub>		NMVOC	NH <sub>3</sub>		
against NEC	8.1			60.1		28.6	24.6	
against Gothenburg				60.1		28.6	24.6	

The table above provides a breakdown of the emission data for the years 2010, 2011, 2018 and 2019 and the four pollutants relevant for Gothenburg and NEC compliance ( $NO_x$ ,  $SO_2$ , NMVOC, and  $NH_3$ ). Starting from the **Germany's emission ceilings** required by the **Gothenburg protocol** and the **NEC directive** respectively, the **Inventory Total** values are provided. These include emission amounts that are not considered for compliance (the so-called "Memo Items", e.g. bunkers, aviation etc.). These amounts are subtracted, resulting in the **National Total** officially used for reporting. These national totals are then compared to the NEC and Gothenburg ceilings and exceedance amounts are provided wherever an exceedance occurs.

In the next step, the **Adjustments** as defined by the CLRTAP Guidelines are applied to the national totals. All German adjustment proposal have been reviewed and accepted by independent expert teams.

Finally, new national totals for compliance checking and the remaining exceedance against both the NEC directive and the Gothenburg protocol are calculated for each pollutant and year. The years 2012 to 2016 are not shown in this table due to space limitations, data from these years is consistent and does not show any further exceedances.

As a general result, it can be derived that Germany meets its reduction targets for  $SO_2$  from 2010 onward, for  $NO_x$  and NMVOC from 2011 onward and for  $NH_3$  from 2018 onward.

## **Current situation per pollutant**

For  $NO_x$ , both the NEC and the Gothenburg commitments have been undercut by 2011 and Germany expects to stay in compliance due to a continuing downward trend.

Germany's  $SO_2$  emissions have been on a steep and steady decline since the 1980's. Today's numbers are significantly lower than expected when the emission ceilings were established, thus Germany does not have any problems meeting its emission ceiling for sulphur oxides.

The national total emissions of **NMVOCs** showed a steady downward trend until 2009. After recovery from the "crisis year" 2009, which brought the emissions up again in 2010, the national totals returned to the level reached in 2009 where they remain stable since. With the majority of emissions resulting from solvent production and application which is primarily governed by product legislation, action on EU level is needed to further bring down these emissions. With the adjustment in agriculture applied, Germany is, however, currently in compliance with its commitments for this pollutant.

For **NH**<sub>3</sub>, emission estimates have been revised significantly and repeatedly over the last years. Due to various inventory changes in the 2015, 2016, 2018 as well as 2021 submissions, each revising critical emission factors, total emissions first went up by about 120kt and have come back down a bit in the latest calculations. The 2016 submission additionally includes the new source "emissions from digested energy crops" for the first time, resulting in extra emissions of about 65 kt per year. Given these changes, compliance was out of reach for a long time, even when taking adjustments into account. In 2018 Germany finally undercut the set goal of 55kt ammonia emission for the first time.

## Adjustments in detail

Please refer to the following sub-sections for details on the emission adjustments applied by Germany:

- Adjustment DE-A for NOx from 1.A.3.b Road Transport
- Adjustment DE-B for NOx and NMVOC from 3.B Manure Management
- Adjustment DE-C for NOx and NMVOC from 3.D Agricultural Soils
- Adjustment DE-D for NOx & NH3 from Energy Crops in 3.D and 3.I