

Chapter 8.2 - Improvements

Improvements since last Submission



- 1.A.3.d ii: introduction of LPG and gasoline as fuels in national inland navigation
- 1.A.3.d ii & 1.A.3.d i (i), 1.A.4.c iii, 1.A.5.b: separate reporting of diesel oil and light fuel oil in navigation
- 6.A.2 : ammonia emissions from cats and dogs taken into account for the first time

Improvements planned for future submissions

Possible improvement issues that have been identified so far and will be checked in the future are given below:

OVER-ALL INVENTORY (all source categories)

- To prioritise improvements on the basis of the results of the uncertainty analysis, it is planned to determine uncertainty analysis at source category level.

stationary fuel combustion:

- 1.A.1.a: evaluation of measurement data on POPs and heavy metal in large combustion plants
- 1.A.1.b: revision of SO₂ emission factors
- further improvements of PAH Emission factors for small combustion plants

mobile fuel combustion:

- 1.A.3.b vi + vii: update of emission factors for abrasive emissions from tyres and brakes (via research project), with special focus on Euro7 standard; possible implementation into TREMOD
- 1.A.3.c: validation and revision of approach for abrasive emissions from railways; possible implementation into TREMOD

industrial processes:

- lead production: update of PCB emission factor
- magnesium production: right allocation of emissions

Investigated Review Findings

NECD 2023

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Official Comment for IIR |
|------------------------|----------|---------------------|---|-----------------------|--------------|---|
| (lack of) Transparency | 2C4 | 2022 | Lack of transparency regarding the use of notation keys does not match IIR description | DE-2-2022-0002 | Partly | The research is ongoing now we have changed the notation keys to NE. Germany will report on the progress made implementing this improvement in IIR submissions. |
| | 2D3 | 2023 | Check Notation keys | DE-2D-2023-0001 | No | |
| | 2D3a | 2023 | Improve discription of domestic solvent use | DE-2D3a-2023-0001 | No | |
| | 2D3i | 2023 | consider the allocation of NMVOC emissions from lubricants concrete additives and plant protectives to source category 2G and provide information for not calculating the emission from use of shoes and clarification about reporting NMVOC from lubricants and cooling lubricants | DE-2D3i-2023-0001 | No | |
| | 3Da2c | 2023 | harmonise the description of conversion of the emission factor for NOX throughout all Chapters for 3D Agricultural soils in the IIR | DE-3Da2c-2023-0001 | Yes | Tier Level corrected to T2 |
| | 3Dc | 2023 | correct Tierlevel for 3Dc in the IIR | DE-3Dc-2023-0001 | No | |
| | 5E | 2023 | Include the information (weighting factors applied for each type of buildings/car fires in order to derive the number of full-scale fires justification that the default emission factors refer to full-scale burning) and complete the description with detailed activity data split by type of fire (small medium major) and category of buildings including the sources of the data. | DE-5E-2023-0001 | Yes | Germany has included an explanation of the determination in IIR and has added an informative graph. |
| | 2A5a | 2023 | Include an explanation for how the share of the emissions from saltmining has been determined | DE-2A5a-2023-0001 | Yes | Updated Publication is now correctly referenced as Vos et al. 2024 |
| Accuracy | 1A3di(i) | 2023 | Check PM2.5 implied emission factor | DE-1A3di(i)-2023-0002 | No | |
| | 2D3e | 2023 | Investigate the possibility of using surrogate data | DE-2D3e-2023-0001 | No | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Official Comment for IIR |
|--------------|--------|---------------------|---|-------------------|--------------|--|
| Completeness | 5A | 2023 | estimate PM emissions from all mineral waste handled (including backfilling) or provide a justification in the IIR that the estimate includes all relevant emissions | DE-5A-2023-0001 | Yes | Germany has improved transparency regarding the methodological description. About the conversion of different types of fires to full-scale fires and about the activity data split by type of fire now there is more information in IIR. |
| | 3B4h | 2023 | Continue the effort in calculating emissions from the category Other animals and include more detailed information on the manner of the gathering activity data for this category | Germany 2023-3B-1 | No | |
| Consistency | 3B4gi | 2023 | Correct inconsistencies in the timeseries and to include explanations of any fluctuations with clear references to other documents and corresponding statements | Germany-2023-3B-4 | No | |
| | 3B4gii | 2023 | Correct inconsistencies in the timeseries and include explanations of any fluctuations with clear references to other documents and corresponding statements in it the IIR | Germany-2023-3B-5 | Yes | Germany will add the link to chimney sweeps statistic in the next IIR submission. |

NECD 2022

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|--------|---------------------|---|-------------------------------|--------------|---|
| (lack of) Transparency | 1A5b | 2022 | Lack of transparency regarding the NOx emissions outlier in 2005 compared to 2000-2010 emissions | DE-1A5b-2022-0001 | Yes | |
| | 1A5b | 2022 | Lack of transparency regarding the PM2.5 emissions outlier in 2005 compared to 2000-2010 emissions | DE-1A5b-2022-0002 | Partly | |
| | 2C4 | 2022 | Lack of transparency regarding the use of notation keys does not match IIR description | DE-2-2022-0002;DE-2-2022-0002 | Partly | The research is ongoing now we have changed the notation keys to NE. Germany will report on the progress made implementing this improvement in IIR submissions. |
| | 2G | 2022 | Lack of transparency regarding the drop in the emissions in 2020 from the previous rather steady trend | DE-2G-2022-0001 | Yes | We have improved the IIR documentation of the allocation of all emissions from the pulp and paper industry and included an explanation of the management of process related sulphur and ammonia emissions for pulping processes occurring in Germany. |
| | 2J | 2022 | Lack of transparency regarding the use of notation keys because the notation keys 'NA' and 'NE' do not match the explanation in the IIR | DE-2J-2022-0001 | Yes | |
| | 2K | 2022 | Lack of transparency on the use of these notation keys and the explanation provided in the IIR | DE-2K-2022-0001 | No | Will be implemented in Submission 2024 |
| | 3D | 2022 | Lack of transparency regarding activity data reported in the NFR tables for years 1990-2020 | DE-3D-2022-0001 | Yes | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|--------------|---------|---------------------|---|----------------------|--------------|---|
| Consistency | 1A4ciii | 2018 | | DE-1A4ciii-2018-0001 | No | This issue is under discussion with the BSH Hamburg as the agency in charge of the underlying model. However, these activity data are based on ship movement data showing a correspondingly increasing trend. Nonetheless, the model is under ongoing revision and erroneous calculations and results will be corrected whenever they are determined. |
| Completeness | 2D3c | 2022 | For particulate matter Germany did not provide estimates and was using the notation key 'NA' (not applicable) in its NFR | DE-2D3c-2022-0001 | Yes | |
| | 2H1 | 2022 | Germany reports 'IE' for all pollutants under NFR 1A2d assuming that the fuel-related emissions are allocated under 2H1 however for BC and CO the notation key 'NE' is used | DE-2H1-2022-0002 | Yes | |
| | 3B | 2022 | Other animals not reported | DE-3B4h-2022-0001 | Yes | |
| | 3Da2a | 2022 | Use of notation key for NMVOC while emissions are expected | DE-3Da2a-2022-0001 | Yes | |
| | 5D1 | 2022 | Lack of transparency regarding dry toilets (including latrines) | DE-5-2022-0001 | No | |
| Accuracy | 3Dc | 2022 | Farm-Level Agricultural Operations should be reported using Tier 2 or higher | DE-3Dc-2022-0001 | Yes | |

NECD 2021

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|--------|--------|---------------------|-----------------|-------------|--------------|---------|
|--------|--------|---------------------|-----------------|-------------|--------------|---------|

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|-----------------------|---------------------|---|----------------------|--------------|---|
| General | LPS | 2021 | Update to the 2019 dataset | DE-LPS-GEN-2021-0002 | No | |
| (lack of) Transparency | 1A1a\1A2gviii\1A4\1B1 | 2021 | Clearly reference EFs used for HCB and BC | DE-1A1a-2021-0001 | Yes | |
| | 1A2b | 2021 | Update notation key used for BC emission | DE-1A2b-2021-0001 | Yes | |
| | 1A2e | 2021 | Update notation key for BC and check allocation | DE-1A2e-2021-0001 | Yes | |
| | 1A4bii | 2021 | Update IIR description | DE-1A4bii-2021-0001 | Yes | |
| | 1A3ei | 2021 | Explicitly state why PM2.5 is equal to PM10 | DE-1A3ei-2021-0001 | Yes | Citation has been updated to the latest GB version - no changes in EF needed. Only for 5C2 some changes in EF is planned. |
| | 5 | 2021 | Update to the latest Guidebook where needed | DE-5-2021-0001 | Yes | Revised emission factors developed according to suggestions in review. |
| Consistency | 1A4ciii | 2018 | Large increase in AD from 2015 to 2016 | DE-1A4ciii-2018-0001 | No | Metal and PCDD/F emissions are not considered as fugitive. If IE would be used nevertheless one can assume there are such fugitives. Germany suggest to keep the notation key NA. |
| | 1A4cii | 2018 | Inconsistent AD values NFR vs. IIR | DE-1A4cii-2018-0001 | Yes | As the National Energy Balances 2003 to 2020 have been revised by the Working Group on Energy Balances (AGEB) in advance of the 2024 submission this erratic trend has been resolved. |
| | 1A1b | 2021 | Resolve time series issue for BC | DE-1A1b-2021-0001 | No | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|---------------|--------|---------------------|---|----------------------|--------------|--|
| Completeness | 2D3g | 2018 | Report PAHs from 2D3g Chemical Products | DE-2D3g-2018-0001 | Yes | notation keys replaced by activity data values |
| | LPS | 2020 | Add missing pollutants PAHs PCBs PM2.5 | DE-LPS-GEN-2020-0001 | Yes | |
| | 1A2a | 2021 | Report BC emissions | DE-1A2a-2021-0002 | No | |
| | 1A2a | 2021 | Include BC emissions | DE-1A2a-2021-0001 | Yes | |
| | 1A5a | 2021 | Include BC emissions | DE-1A5a-2021-0001 | Yes | The notation key for BC is changed from 'NA' to 'NE' and a justification for this notation key is included in the IIR. |
| | 2A3 | 2021 | Include BC emissions | DE-2A3-2021-0001 | Yes | |
| | LPS | 2021 | Include PCDD/F emissions | DE-LPS-GEN-2021-0001 | No | |
| | GRID | 2021 | Include NOx emissions from shipping | DE-GRID-G-2021-0001 | Yes | |
| Comparability | 1B1b | 2021 | Update PAH reporting | DE-1B1b-2021-0001 | Yes | Details of the methodology used for BaP and for PAH-1-4 estimation are explained in IIR 2022. |
| | 2A1 | 2021 | Update PAH reporting | DE-2A1-2021-0001 | Yes | |
| | 2C1 | 2021 | Update PAH reporting | DE-2C1-2021-0001 | Partly | |
| | 2C3 | 2021 | Update PAH reporting | DE-2C3-2021-0001 | No | |
| Accuracy | 1A2f | 2021 | Move CO emission calculation to a higher tier | DE-1A2f-2021-0003 | Yes | |

NECD 2020

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|---------|--------|---------------------|--|----------------------|--------------|---------|
| General | LPS | 2020 | Improve consistency with the latest ePRTR reporting. | DE-LPS-GEN-2020-0002 | Yes | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|---------|---------------------|---|----------------------|--------------|--|
| (lack of) Transparency | 3I | 2020 | Improve the transparency of the calculations used for NO emissions from storage of digestate from energy crops. | DE-3I-2020-0001 | Yes | |
| | 2C7a | 2020 | Improve Transparency for Cd and Pb emissions from copper production | DE-2C7a-2020-0001 | Yes | |
| | LPS | 2020 | Reallocate livestock emissions from GNFR L_AgriOther to K_AgriLivestock | DE-LPS-K-2020-0001 | Yes | |
| Consistency | 1A4cii | 2018 | IEF Cd trend since 2007 erratic | DE-1A4cii-2018-0001 | Partly | As described in the relevant IIR chapter activity data for maritime navigation including fishing is estimated bottom-up in a country-specific model and based on ship movement data. From that perspective jumps in fuel consumption cannot be explained by errors in statistics but are assumed to represent reality in respect to the amounts of fuels used by fishing vessels operating from German harbours. |
| | 1A4ciii | 2018 | Large increase in AD from 2015 to 2016 | DE-1A4ciii-2018-0001 | No | Metal and PCDD/F emissions are not considered as fugitive. If IE would be used nevertheless one can assume there are such fugitives. Germany suggest to keep the notation key NA. |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|--------------|--------|---------------------|--|-----------------------------------|--------------|---|
| Completeness | 2B6 | 2017 | Include the NOx emissions in the next submission. | DE-2B6-2017-0001;DE-2B6-2018-0001 | Yes | |
| | 2D3g | 2018 | Report PAHs from 2D3g Chemical Products | DE-2D3g-2018-0001 | Yes | notation keys replaced by activity data values |
| | 2C1 | 2018 | Potential under-estimate of emissions of HCB | DE-2C1-2018-0001 | Yes | |
| | 5D2 | 2019 | NMVOC emissions missing although default EFs exist | DE-5D2-2019-0001 | Yes | |
| | 2D3a | 2019 | Emissions of Hg not estimated | DE-2D3a-2019-0001 | Yes | Default-EF used emissions reported. |
| | LPS | 2020 | Add missing pollutants PAHs PCBs PM2.5 | DE-LPS-GEN-2020-0001 | Yes | |
| | GRID | 2020 | Add gridded emissions of Cd Pb Hg PCDD/F PAHs HCB PCBs to reporting | DE-GRID-GEN-2020-0001 | Yes | Germany now includes a new estimate based on further analysis in sector 2A2 in sector 1A2f you can find only the notation key 'IE'. |
| Accuracy | 2D3a | 2018 | Rationale for not estimating emissions in category 2D3a and notation key selection | DE-2D3a-2018-0001 | Yes | References to research Projects of CS-EF added |
| | LPS | 2020 | Check emission data for facility "Heyne & Penke Verpackungen GmbH" | DE-LPS-E-2020-0001 | Yes | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|--------|--------|---------------------|---|----------------------|--------------|--|
| QA/QC | LPS | 2020 | Improve coordinates given check for collisions | DE-LPS-GEN-2020-0004 | No | Germany checked this issue and does not see any reason to change the data. It is unclear why LPS name GNFR and stack height should function as a key alternative in particular because the table already provides the ePRTR ID as an unique and valid key. |
| | LPS | 2020 | Make sure each point source reported has unique key build from attributes | DE-LPS-GEN-2020-0003 | No | Since these pollutants are not in the ePRTR dataset Germany cannot report them. |

NECD 2019

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|---------|---------------------|---|-----------------------------------|--------------|---------|
| (lack of) Transparency | 1A1 | 2017 | Presents its NH3 EF for stationary combustion in the next submission of its IIR justify the use of these and compare these against the values in 2016 EMEP/EEA Guidebook. | DE-1A1-2017-0001;DE-1A1-2018-0001 | Yes | |
| Consistency | 1A4cii | 2018 | IEF Cd trend since 2007 erratic | DE-1A4cii-2018-0001 | Partly | |
| | 1A4ciii | 2018 | Large increase in AD from 2015 to 2016 | DE-1A4ciii-2018-0001 | No | |
| | 1A4bii | 2019 | Significant fluctuations in fuel consumption over the time series | DE-1A4bii-2019-0001 | Yes | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|---------------|--------|---------------------|---|-------------------------------------|--------------|--|
| Completeness | 2B3 | 2017 | Include the NOx emissions in the next submission preferably using a country specific method to account for the specific technologies and abatement equipment applied. | DE-2B3-2017-0001;DE-2B3-2018-0001 | Yes | |
| | 2B6 | 2017 | Include the NOx emissions in the next submission. | DE-2B6-2017-0001;DE-2B6-2018-0001 | Yes | |
| | 5A | 2017 | Include NMVOC and PM2.5 emissions from 5A in its next submission. | DE-5A-2017-0001;DE-5A-2018-0001 | Yes | Solid waste emissions implemented since 2020 reporting. Domestic wastewater emissions implemented since 2018 reporting. Industrial wastewater emissions implemented since 2021 reporting. |
| | 2D3g | 2018 | Report PAHs from 2D3g Chemical Products | DE-2D3g-2018-0001 | Yes | notation keys replaced by activity data values |
| | 2C1 | 2018 | Potential under-estimate of emissions of HCB | DE-2C1-2018-0001 | Yes | |
| | 5D2 | 2019 | NMVOC emissions missing although default EFs exist | DE-5D2-2019-0001 | Yes | |
| | 1A2a | 2019 | NE reported for Cadmium although a default EF is available | DE-1A2a-2019-0001 | Yes | |
| | 1A2b | 2019 | NE reported for some pollutants although default EFs are available | DE-1A2b-2019-0002 | No | Germany carefully checked all possible additional sources for HCB in this sector. This includes the BREF documents as well as other literature. There was no indication for any missing emission found. The emission factors in the Guidebook are only applicable to processes not occurring in Germany. |
| | 1A2b | 2019 | NA is reported for HCB 1990 | DE-1A2b-2019-0001 | Yes | Emissions calculated based on default EF |
| | 1A3b | 2019 | PCB emissions missing for all years although default emission factors are available | DE-1A3b-2019-0001 | Yes | |
| | 1A3c | 2019 | Update notation key from NE to NA | DE-1A3c-2019-0001 | Yes | |
| | 2D3a | 2019 | Emissions of Hg not estimated | DE-2D3a-2019-0001 | Yes | Default-EF used emissions reported. |
| | 5C2 | 2019 | Emission are not estimated for PCDD/F Pb and Cd although default EFs are available | DE-5C2-2019-0001 | Yes | |
| Comparability | 1A4ai | 2019 | Implied EFs PAHs and PCDD/F are outliers compared to other member states | DE-1A4ai-2019-0001 | No | |
| Accuracy | 1A1a | 2017 | Include the revised estimate of activity data and emissions for biogas in its next submission. | DE-1A1a-2017-0003;DE-1A1a-2018-0001 | Partly | Implemented for 1A4ai and 1A4ci |
| | 2D3a | 2018 | Rationale for not estimating emissions in category 2D3a and notation key selection | DE-2D3a-2018-0001 | Yes | References to research Projects of CS-EF added |
| | 3B | 2019 | Tier 1 method used for key category | DE-3B-2019-0001 | Yes | Industrial wastewater NMVOC emissions were implemented and are part of the 2021 reporting. |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|---------|---------------------|---|--|--------------|--|
| (lack of) Transparency | 1A1 | 2017 | Presents its NH3 EF for stationary combustion in the next submission of its IIR justify the use of these and compare these against the values in 2016 EMEP/EEA Guidebook. | DE-1A1-2017-0001;DE-1A1-2018-0001 | Yes | |
| | 1A1b | 2014 | Include the country specific EFs for combustion in refineries in the relating chapter of its IIR to improve transparency. | § 55 (CLRTAP 2014);DE-1A1b-2017-0001;DE-1A1b-2018-0001 | Yes | |
| | 2D3d | 2017 | Include explanation on recalculation to 1994 in the next submission. | DE-2D3d-2017-0001;DE-2D3d-2018-0001 | Yes | |
| | 1A3bi | 2018 | Incorrect notation keys for activity data | DE-1A3bi-2018-0002 | Yes | 'NE' replaced by 'NA' as suggested by the TERT |
| | 1A3bv | 2018 | Incorrect notation keys for HCB and PCB emissions | DE-1A3bv-2018-0001 | Yes | As the National Energy Balances 2003 to 2020 have been revised by the Working Group on Energy Balances (AGEB) in advance of the 2024 submission this erratic trend has been resolved. |
| Consistency | 1A4cii | 2018 | IEF Cd trend since 2007 erratic | DE-1A4cii-2018-0001 | Partly | As described in the relevant IIR chapter activity data for maritime navigation including fishing is estimated bottom-up in a country-specific model and based on ship movement data. From that perspective jumps in fuel consumption cannot be explained by errors in statistics but are assumed to represent reality in respect to the amounts of fuels used by fishing vessels operating from German harbours. |
| | 1A4ciii | 2018 | Large increase in AD from 2015 to 2016 | DE-1A4ciii-2018-0001 | No | Metal and PCDD/F emissions are not considered as fugitive. If IE would be used nevertheless one can assume there are such fugitives. Germany suggest to keep the notation key NA. |
| | 1A4cii | 2018 | Inconsistent AD values NFR vs. IIR | DE-1A4cii-2018-0001 | Yes | As the National Energy Balances 2003 to 2020 have been revised by the Working Group on Energy Balances (AGEB) in advance of the 2024 submission this erratic trend has been resolved. |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|---------------|--------|---------------------|---|-------------------------------------|--------------|---|
| Completeness | 2B3 | 2017 | Include the NOx emissions in the next submission preferably using a country specific method to account for the specific technologies and abatement equipment applied. | DE-2B3-2017-0001;DE-2B3-2018-0001 | Yes | |
| | 2B6 | 2017 | Include the NOx emissions in the next submission. | DE-2B6-2017-0001;DE-2B6-2018-0001 | Yes | |
| | 2C3 | 2017 | Include NOx from aluminium production in the next submission to improve completeness and comparability. | DE-2C3-2017-0001;DE-2C3-2018-0002 | Yes | |
| | 5A | 2017 | Include NMVOC and PM2.5 emissions from 5A in its next submission. | DE-5A-2017-0001;DE-5A-2018-0001 | Yes | Solid waste emissions implemented since 2020 reporting. Domestic wastewater emissions implemented since 2018 reporting. Industrial wastewater emissions implemented since 2021 reporting. |
| | 5D | 2017 | Include the estimation of NMVOC emissions from wastewater treatment plant in its next submission. | DE-5D-2017-0001;DE-5D-2018-0001 | Yes | |
| | 2D3g | 2018 | Report PAHs from 2D3g Chemical Products | DE-2D3g-2018-0001 | Yes | notation keys replaced by activity data values |
| | 1B2aiv | 2018 | Potential under-estimate of emissions of Hg Cd PCDD/F | DE-1B2aiv-2018-0001 | Yes | Data acquisition for the resolution of this issue will be implemented in the framework of a research project updating several emission factors. The effort is scheduled to start in 2021 and will take about 3 years. Until then the default emission factor from the EMEP/EEA Guidebook is used. |
| | 2C1 | 2018 | Potential under-estimate of emissions of HCB | DE-2C1-2018-0001 | Yes | |
| | 2C3 | 2018 | Potential under-estimate of emissions of HCB | DE-2C3-2018-0001 | No | Germany is in the process of evaluating data to calculate emissions of Hg from the use of fluorescent tubes. |
| Comparability | 5C | 2018 | Hg EF is 100 times smaller than the default value proposed in the 2016 EMEP/EEA Guidebook and the Cd and Pb EF are 1000 times smaller than the default values proposed in the 2016 EMEP/EEA Guidebook | DE-5-2018-0001 | No | |
| Accuracy | 1A1a | 2017 | Include the revised estimate of activity data and emissions for biogas in its next submission. | DE-1A1a-2017-0003;DE-1A1a-2018-0001 | Partly | Implemented for 1A4ai and 1A4ci |
| | 2D3a | 2018 | Rationale for not estimating emissions in category 2D3a and notation key selection | DE-2D3a-2018-0001 | Yes | References to research Projects of CS-EF added |

NECD 2017

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|----------|---------------------|--|--|--------------|---|
| (lack of) Transparency | 1A1 | 2017 | Presents its NH3 EF for stationary combustion in the next submission of its IIR justify the use of these and compare these against the values in 2016 EMEP/EEA Guidebook. | DE-1A1-2017-0001;DE-1A1-2018-0001 | Yes | |
| | 1A1a | 2017 | Improves the transparency of its IIR regarding PM2.5 shares used for each fuel (solid fuels (coal and lignite) and gaseous fuels but also biomass if relevant). | DE-1A1a-2017-0001 | No | The emission factors continue to be under revision. New emission factors will be included in the IIR following the use of results of a finished project. |
| | 1A1b | 2014 | Include the country specific EFs for combustion in refineries in the relating chapter of its IIR to improve transparency. | § 55 (CLRTAP 2014);DE-1A1b-2017-0001;DE-1A1b-2018-0001 | Yes | The reporting in the different source categories is explained in the IIR. |
| | 1A2gviii | 2017 | Improve the transparency of the IIR to explain its assumptions on the PM2.5 fraction used for each fuel and particularly for liquid fuels biomass and other fuels. | DE-1A2gviii-2017-0001 | Yes | |
| | 2A1 | 2017 | Include the explanation and rationale for using two sets of activity data to be included in the IIR for the next submission. | DE-2A1-2017-0001 | Yes | |
| | 2C | 2017 | Update the SO2 emission factors for 2C5 2C6 and 2C7a for the next submission to reflect the individual production activities and to include more transparent information on primary vs. secondary production of lead zinc and copper in the IIR. | DE-2C-2017-0001 | Yes | Was reported with the submission 2019. |
| | 2D3d | 2017 | Include explanation on recalculation to 1994 in the next submission. | DE-2D3d-2017-0001;DE-2D3d-2018-0001 | Yes | |
| | 3B | 2017 | Include the information for the proportional of NO-N and N2 and the reference in the IIR to improve transparency. | DE-3B-2017-0002 | Yes | |
| | 3B2 | 2017 | Mention that NFR 3B2 includes lambs and also explain the lower EF NMVOC used for lambs. Furthermore the TERT recommend that Germany in IIR mentioned that pullets are included in NFR 3B4giv other poultry. | DE-3B2-2017-0004 | Yes | |
| | 3F | 2017 | Include more information in the IIR for the next submission referring to the specific law and clarifying from which year the ban came into force. Furthermore it is recommended to inform whether there are derogations for field burning under certain circumstances or for certain crop types. | DE-3F-2017-0001 | Yes | Information on methods used for estimation of energy-related is reported in NFR 1. Germany considers NO to be correct and explains the situation in its IIR. Cremation estimation is explained now. |
| Consistency | 1A2 | 2017 | Use the right notation keys in the NFR tables for its next submissions. (1A2 Stationary Combustion in Manufacturing Industries and Construction PM2.5 2005-2015) | DE-1A2-2017-0001 | Yes | |
| | 5E | 2010 | Although the Guidebook has methods for car and house fires in Chapter 6 it may be more transparent to include these in Chapter 7 as Chapter 6D is more focused on compost and sludge. The ERT encourages Germany to consider including some of these emissions in the next submissions. | § 116 (CLRTAP 2010);§139 (CLRTAP 2014);DE-5A-2017-0003 | Partly | Car and house fires have been included for quite a while now (5E). Human NH3 emissions are considered in 6A. Pets will be considered in sub2024. |
| | 2B10a | 2017 | Investigate whether flaring occurs in relation to carbide production e.g. by contacting the single producer of carbide. | DE-2B10a-2017-0002 | Yes | |
| Completeness | 2B3 | 2017 | Include the NOx emissions in the next submission preferably using a country specific method to account for the specific technologies and abatement equipment applied. | DE-2B3-2017-0001;DE-2B3-2018-0001 | Yes | |
| | 2B6 | 2017 | Include the NOx emissions in the next submission. | DE-2B6-2017-0001;DE-2B6-2018-0001 | Yes | |
| | 2C3 | 2017 | Include NOx from aluminium production in the next submission to improve completeness and comparability. | DE-2C3-2017-0001;DE-2C3-2018-0002 | Yes | |
| | 3D1bii | 2017 | Include the emission from sewage sludge applied to agricultural soils in the next submission. | DE-3Da2b-2017-0001 | Yes | |
| | 5A | 2017 | Include NMVOC and PM2.5 emissions from 5A in its next submission. | DE-5A-2017-0001;DE-5A-2018-0001 | Yes | Solid waste emissions implemented since 2020 reporting. Domestic wastewater emissions implemented since 2018 reporting. Industrial wastewater emissions implemented since 2021 reporting. |
| | 5D | 2017 | Include the estimation of NMVOC emissions from wastewater treatment plant in its next submission. | DE-5D-2017-0001;DE-5D-2018-0001 | Yes | |
| Comparability | 3D1a | 2017 | Use the updated emission factors available in the 2016 EMEP/EEA Guidebook (Table 3.2) for the next submission. | DE-3Da1-2017-0001 | Yes | Little information is available due to the split of Germany into two nations. Some overview data has been added to the IIR. |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|----------|--------|---------------------|--|-------------------------------------|--------------|---------------------------------|
| Accuracy | 1A1a | 2017 | Include the revised estimate of activity data and emissions for biogas in its next submission. | DE-1A1a-2017-0003;DE-1A1a-2018-0001 | Partly | Implemented for 1A4ai and 1A4ci |

CLRTAP 2023

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|----------------|---------------------|--|-------------------|--------------|---|
| (lack of) Transparency | 3F | 2023 | Include information and the correct reference to Roseman et al. (2023) in the IIR | Germany-2023-3F-1 | No | Updated Publication is now correctly referenced as Vos et al. 2024 |
| | KCA | 2023 | Includes information on available the linked background files on the quantitative KCA level and trend assessment in its IIR | Germany-2023-0-1 | Yes | |
| | 3B2\3B4d\3B4e | 2023 | Add in the improvement plan a year in which the CLRTAP recommendation was implemented to include a clear reference to the chapters of the NIR and other documents and to link the previous IIRs in the relevant chapters | Germany-2023-3B-2 | No | |
| | 3b1a\3B3\3B4gi | 2023 | include the provided justifications of fluctuations in emissions and changes in the calculations in its IIR and to add in the improvement plan the year in which the recommendation was implemented | Germany-2023-3B-3 | No | |
| Consistency | 3B4gi | 2023 | correct inconsistencies in the timeseries and to include explanations of any fluctuations with clear references to other documents and corresponding statements | Germany-2023-3B-4 | No | |
| | 3B4gii | 2023 | Correct inconsistencies in the timeseries and include explanations of any fluctuations with clear references to other documents and corresponding statements in it the IIR | Germany-2023-3B-5 | Yes | |
| Completeness | 3B4h | 2023 | Continue the effort in calculating emissions from the category Other animals and include more detailed information on the manner of the gathering activity data for this category | Germany 2023-3B-1 | No | Emissions from other animals (deer ostrich rabbits fur-bearing animals) included. |

CLRTAP 2022

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|--------|---------------------|--|--------------------|--------------|--|
| (lack of) Transparency | 1A4bi | 2022 | Document the description of the activity date in more detail including information from the chimney sweeps statistic in the next IIR submission. | § 10 (CLRTAP 2022) | No | Germany will add the link to chimney sweeps statistic in the next IIR submission. |
| | 1A4bi | 2022 | Provide a complete and clear documentation on the splitting of appliance types are in the next IIR submission. | § 12 (CLRTAP 2022) | Partly | Germany will check possible further information and report the results in future IIR submission. |
| | 1A4bi | 2022 | Include information on the measurement standards and equipment used to determine the emission factors. | § 14 (CLRTAP 2022) | No | Germany will check possible further information and report the results in future IIR submission. Nevertheless information about the status is already included in IIR. |
| | 1A4bi | 2022 | Include the information provided during the review on the approach to the so-called user impact | § 17 (CLRTAP 2022) | No | Germany will look at the development of the Guidebook and then will consider changes. |
| | 1A4bi | 2022 | Include further information on the age distribution of the vehicle fleet and more information about the traffic condition. | § 25 (CLRTAP 2022) | | |
| Completeness | 1A4bi | 2022 | Further investigate for each biomass and coal PM emission factor whether or not condensables are included. | § 18 (CLRTAP 2022) | No | Germany will look at the development of the Guidebook and then will consider changes. |

CLRTAP 2014

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|---------|--------|---------------------|--|---|--------------|--|
| General | | 2010 | Provide a PDF version of the IIR for offline use and to better facilitate the review process | § 6 9 11 28 (CLRTAP 2010); § 17 (CLRTAP 2014) | Yes | The German IIR is basically created in the form and structure of a wiki and is published as such. A parallel publication in the form of a continuous text document is currently not planned. However the inventory compiler routinely creates a PDF copy of the finished report particularly for documentation purposes - which can be made available upon request and if necessary for example during a review. |
| | | 2014 | Use the results of the KCA to prioritise improvements in the inventory | § 14 (CLRTAP 2014) | Yes | |

| Aspect | Sector | First identified in | Finding summary | Observation | Implemented? | Comment |
|------------------------|----------|---------------------|--|--|--------------|--|
| (lack of) Transparency | 3B | 2014 | Explain the variation in activity data for goats in the IIR. | § 120 (CLRTAP 2014) | Yes | |
| | 2D3 | 2014 | The methodology described in the IIR for solvent and other product use is found to be not transparent. Provide detail on all 37 subcategories including activity data and emission factors. | § 18 96 97 98 (CLRTAP 2014) | Yes | The transparency for the solvents used and products used sector in the IIR was much improved in the submission 2016. |
| | | 2010 | Inaccuracies were found in the use of notation keys and it is recommended to justify the use of notation keys in the IIR for each particular sector. | § 38 (CLRTAP 2010);§ 19 (CLRTAP 2014) | Yes | Information tables for NE & IE were added to the completeness chapter of the current IIR. |
| | | 2014 | Provide more detailed to explain emission trends e.g. annual fluctuations and discontinuities of emissions. | § 21 78 (CLRTAP 2014) | Yes | |
| | | 2014 | Extend the use of a bibliography for some subsectors to all sectors in the IIR. | § 77 (CLRTAP 2014) | No | The amount of recurring references is very small within most source categories. And the total number of references per page is usually quite low. So directly linking to the documents seems like a good way to make sources available to the readers. |
| | 1A1b | 2014 | Include the country specific EFs for combustion in refineries in the relating chapter of its IIR to improve transparency. | § 55 (CLRTAP 2014);DE-1A1b-2017-0001;DE-1A1b-2018-0001 | Yes | The emission factors continue to be under revision. New emission factors will be included in the IIR following the use of results of a finished project. |
| | 1A3b | 2010 | Explain in more detail the emission calculation for road transport not only by saying that HBEFA and TREMOD are used but giving more information including an overview of emission factors in the next versions of the IIR. | § 65 (CLRTAP 2010);§ 72 (CLRTAP 2014) | Yes | |
| | 1B2d | 2014 | Report in the IIR on what basis emissions from geothermal energy extraction are considered negligible. | § 59 (CLRTAP 2014) | Yes | |
| | 3B | 2014 | Provide additional information in the IIR especially related to: TAN contents distributions of housing and storage facilities (e.g. for the first and last reporting year) slurry storage systems and the spreading systems applied corresponding EFs. | § 117 (CLRTAP 2014) | Yes | |
| | 5A\5B\5C | 2010 | Since all incineration is reported under energy add information about the methodology used for different types of waste incineration under NFR 1. In NFR 6C use the notation key "IE" instead of "NO" and to explain the use of the notation key in the IIR. | § 103 110 111 112 (CLRTAP 2010);§ 136 (CLRTAP 2014) | Yes | Information on methods used for estimation of energy-related is reported in NFR 1. Germany considers NO to be correct and explains the situation in its IIR. Cremation estimation is explained now. |

CLRTAP 2014

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|---------|--------|---|----------------------|-------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|--|
| General | | Provide a PDF version of the IIR for offline use and to better facilitate the review process | § 6 9 11 28 | § 17 | | | | | | | No | The current Wiki platform isn't able to export a whole site to PDF. But we can provide an offline HTML version with full navigation. |
| General | | Use the results of the KCA to prioritise improvements in the inventory | | § 14 | | | | | | | Yes | |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| QA/QC | | Fully implement the QA/QC system for the air pollutant emission inventory. If possible implement a unified QA/QC system for reporting to CLRTAP and UNFCCC. | § 21 24 62 74 88 105 | § 37 44f | | | | | | | No | Ongoing discussion |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|--------------|--------|--|-------------|-----------------------------|-------------------|-------------------|-----------|-----------|-----------|-----------|--------------|--|
| QA/QC | | Widen the use of the existing QA/QC system used for the set of activity data as well as the methods and emission factors for GHGs for the needs of CLRTAP/NECD inventories and providing further details on its implementation in the IIR (general and sectoral descriptions). | § 33 40 | § 16 69 84 87 103 105 | | | | | | | No | Ongoing discussion |
| QA/QC | | Include information on verification and validation of the inventory in the IIR. | | § 38 | | | | | | | No | Ongoing discussion |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| Transparency | | Inaccuracies were found in the use of notation keys and it is recommended to justify the use of notation keys in the IIR for each particular sector. | § 38 | § 19 | | | | | | | Yes | Information tables for NE & IE were added to the completeness chapter of the current IIR |
| Transparency | | Provide more detailed to explain emission trends e.g. annual fluctuations and discontinuities of emissions. | | § 21 78 | | | | | | | Yes | |
| Transparency | | Extend the use of a bibliography for some subsectors to all sectors in the IIR. | | § 77 | | | | | | | Partly | The amount of recurring references is very small within most source categories. And the total number of references per page is usually quite low. So directly linking to the documents seems like a good way to make sources available to the readers. |
| Transparency | 1A1b | Include the country specific EFs for combustion in refineries in the relating chapter of its IIR to improve transparency. | | § 55 | DE-1A1b-2017-0001 | DE-1A1b-2018-0001 | | | | | No | Emission factors are under revision. New emission factors will be included in the IIR following completion of the running refinery project. |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|--------------|----------|--|-------------------|---------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---|
| Transparency | 1A3b | Explain in more detail the emission calculation for road transport not only by saying that HBEFA and TREMOD are used but giving more information including an overview of emission factors in the next versions of the IIR. | § 65 | § 72 | | | | | | | Yes | |
| Transparency | 1B2d | Report in the IIR on what basis emissions from geothermal energy extraction are considered negligible. | | § 59 | | | | | | | Yes | |
| Transparency | 2D3 | The methodology described in the IIR for solvent and other product use is found to be not transparent. Provide detail on all 37 subcategories including activity data and emission factors. | | § 18 96 97 98 | | | | | | | Yes | The transparency for the solvents used and products used sector in the IIR was much improved in the submission 2016. |
| Transparency | 3B | Explain the variation in activity data for goats in the IIR. | | § 120 | | | | | | | Yes | |
| Transparency | 3B | Provide additional information in the IIR especially related to: TAN contents distributions of housing and storage facilities (e.g. for the first and last reporting year) slurry storage systems and the spreading systems applied corresponding EFs. | | § 117 | | | | | | | Yes | |
| Transparency | 5A\5B\5C | Since all incineration is reported under energy add information about the methodology used for different types of waste incineration under NFR 1. In NFR 6C use the notation key "IE" instead of "NO" and to explain the use of the notation key in the IIR. | § 103 110 111 112 | § 136 | | | | | | | Yes | Information on methods used for estimation of energy-related is reported in NFR 1. Germany considers NO to be correct and explains the situation in its IIR. Cremation estimation is explained now. |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|-------------|---------|---|-------------|--------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---|
| Consistency | 1A1\1A2 | In the IIR in the "Short description" for 1A1 and 1A2 Germany presents a tier 2 or 3 approach. However during the review Germany indicated that only the tier 2 approach was used. This needs correction in the IIR (was agreed by Germany to do this) | § 47 | § 54 | | | | | | | Yes | |
| Consistency | 2 | Ensure time series consistency of TSP emissions between 1990 and later years and clearly explain in the IIR where and why consistent reporting is not possible. | | § 80 | | | | | | | Yes | |
| Consistency | 2A1\2A2 | A time series inconsistency is found which relates to a different reporting structure before 2000. It is recommended to explore the feasibility of harmonizing the methodology. | | § 93 | | | | | | | Yes | |
| Consistency | 2D3 | Provide emissions for 1990-2005 at a disaggregated level similar to later years if possible. If not explain why for the earlier period emissions have been estimated at a more aggregated level. Also clearly document in the case of IE where emissions have been allocated. | | § 100 101 | | | | | | | Yes | The manufacturing industry was the most important branch of the GDR economy. The transformation of the markets and the disappearance of large state-owned enterprises in the course of the German unity led to a dramatic change in the eastern part of Germany |
| Consistency | 3B | The ERT encourages Germany to further improve the consistency of the time series of NH3 for manure management. In chapter 4 of the EMEP/EEA Guidebook 2013 specific methods are provided. | | § 110 | | | | | | | Yes | |
| Consistency | 3B | Sheep animal numbers show a step change due to a different reporting time. This should be corrected for and described in the IIR as appropriate. | | § 119 | | | | | | | Yes | |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|--------------|--------------------|--|-------------|-------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|--|
| Consistency | 3B | Check and explain the variation in activity data for horses in the IIR. | | § 121 | | | | | | | Yes | |
| Consistency | 3B | Explain how the change in farm practices or the implementation of mitigation measures has affected the time series in the IIR in order to facilitate the assessment of emission trends. | | § 111 | | | | | | | Yes | |
| Consistency | 3B | Explain in the IIR why the NH3 EF for dairy cattle decreased from 2011 to 2012. | | § 122 | | | | | | | Yes | |
| Consistency | 3B | Explain in the IIR why the NH3 EF for swine decreased from 1993 to 1994. | | § 123 | | | | | | | Yes | |
| Consistency | 3B | Explain in the IIR why the NH3 EF significant changes for different poultry subsectors in the 2000s. | | § 124 | | | | | | | Yes | |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| Completeness | | Emissions prior to 1990 are not reported. | § 27 | § 24 | | | | | | | Yes | |
| Completeness | | LPS data were not reported. | | § 10 | | | | | | | Yes | |
| Completeness | | A key category analysis (KCA) was missing for the base years (1990 or 2000 for PM) of the pollutants. | | § 13 | | | | | | | Yes | |
| Completeness | 1A3ai(i)\1A3aii(i) | Heavy metal emissions are currently not estimated. The ERT recommends that the Party estimates these emissions using the methodology in the EMEP/EEA Guidebook. | | § 62 | | | | | | | Yes | |
| Completeness | 1A3biv\1A4bii | PM10 and PM2.5 emissions are reported as "NE". The ERT recommends that Germany completes the inventory by estimating these emissions. | | § 63 | | | | | | | Yes | |
| Completeness | 1A3bv | Evaporative emissions from running losses (i.e. vapour generated in the fuel tank during vehicle operation) were missing because not considered in the TREMOD model. The ERT recommends to include these in the inventory. | | § 73 | | | | | | | No | This issue has not yet been looked into as other model revisions especially regarding a follow-up of 'diesel gate' appear much more relevant tying up all resources. |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|--------------|------------------|--|-------------|--------------|-----------------|-----------|-----------|-----------|-----------|-----------|--------------|---|
| Completeness | 1A3dii | Pb and Hg emissions are currently not estimated. The ERT recommends that the Party considers the emission factors available in the Guidebook. | | § 64 | | | | | | | Yes | |
| Completeness | 1A4ai\1A4ci\1A5a | HM and POP currently not reported since no consistent dataset is available (partly country specific partly Guidebook). The recommendation is to describe the issue in the IIR and until it is solved use the Guidebook emission factors despite their recognized uncertainty rather than reporting NE. | | § 57 | | | | | | | Partly | Implemented for 1A4ai and 1A4ci |
| Completeness | 5A\5C\5D | The inventory regarding Waste is currently not complete with missing estimates for several source categories. | § 102 | § 134 135 | | | | | | | Yes | Industrial wastewater emissions implemented since 2021 reporting. Solid waste emissions implemented since 2020 reporting. Domestic wastewater emissions implemented since 2018 reporting. 5.C completed |
| Completeness | 5A\5D | Improves the completeness of the inventory by estimating emissions from solid waste disposal and wastewater handling. | | § 127 | | | | | | | Yes | Solid waste emissions implemented since 2020 reporting. Domestic wastewater emissions implemented since 2018 reporting. Industrial wastewater emissions implemented since 2021 reporting. |
| Completeness | 5E | Although the Guidebook has methods for car and house fires in Chapter 6 it may be more transparent to include these in Chapter 7 as Chapter 6D is more focused on compost and sludge. The ERT encourages Germany to consider including some of these emissions in the next submissions. | § 116 | §139 | DE-5A-2017-0003 | | | | | | Yes | |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|----------|--------------|---|-------------|-------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---|
| Accuracy | | Implement a (qualitative and quantitative) uncertainty analysis and use the results to prioritize improvements to the inventory | § 20 24 | § 32 44e 85 | | | | | | | Yes | |
| Accuracy | | Include a chapter in the IIR with for each source category the foreseen improvements for the inventory | | § 34 | | | | | | | Partly | Included for most categories |
| Accuracy | 1A3bvi | This source is a key category for Pb and the ERT has noted that the emission factor for brake wear used by Germany was higher than the maximum range quoted by the 2013 Guidebook. Germany is recommended to review the EF explain where it is coming from in the IIR and potentially revise to bring in line with the Guidebook. | | § 74 | | | | | | | Yes | |
| Accuracy | 1A3diii\1A5b | Review the methodology for national navigation by distinguishing between coastal and inland shipping based on an ongoing research project as well as explicitly include emissions from military activities. | | § 75 76 | | | | | | | Yes | |
| Accuracy | 2A1 | Cement production is a key source for Hg HCB and for NOx PM10 and PAH but Tier 1 is used. The ERT encourages Germany to use plant-specific data collected as part of the LCPD IPPC and E-PRTR to develop a tier 2 or 3 methodology in the near future and to document these in its IIR. | § 79 | § 88 | | | | | | | Yes | plant-specific data approach is not planned |

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|---------------|-----------------------|--|-------------|-------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---|
| Accuracy | 2D3 | Increase the use of information from individual installations that make a high contribution to the key categories such as car assembly sites and big printing installations. | | § 104 | | | | | | | Yes | Emissions caused by the use of solvents and solvent-based products are reported in the relevant source groups. In our methodology we also include the application of solvent-based products in large installations such as those used in automotive series production or large printing systems. The emission data of defined individual plants are thus included in the calculation but cannot be shown and published individually for reasons of confidentiality and data protection. |
| Accuracy | 3B | Describe the efforts taken to verify / validate the emission model in the IIR. | | § 118 | | | | | | | Yes | |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| Comparability | 1A2a\1A4ai\1A4ci\1A5a | Notation key NE is used for (many) heavy metals despite the availability of EFs in the EMEP/EEA Guidebook. If all HM emissions from iron & steel are reported in 2C1 the notation key should be IE. | | § 56 | | | | | | | Partly | Implemented for 1A4ai and 1A4ci |
| Comparability | 1A4bii\1A4cii | Implied NOx emission factors are at the high end of the range when compared with a selected group of countries (AT BE DK ES FI FR GB IE IT NL NO). The ERT recommends that the Party reviews the emission factors for these two sources and includes an explanation for this issue in the IIR. | | § 66 | | | | | | | No | This minor issue has not yet been checked. The inventory compiler will look into this as soon as resources allow. |

CLRTAP 2010

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|--------------|--------------|---|----------------------|-----------------------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|--|
| General | | Provide a PDF version of the IIR for offline use and to better facilitate the review process | § 6 9 11 28 | § 17 | | | | | | | No | The current Wiki platform isn't able to export a whole site to PDF. But we can provide an offline HTML version with full navigation. |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| QA/QC | | Fully implement the QA/QC system for the air pollutant emission inventory. If possible implement a unified QA/QC system for reporting to CLRTAP and UNFCCC. | § 21 24 62 74 88 105 | § 37 44f | | | | | | | No | Ongoing discussion |
| QA/QC | | Widen the use of the existing QA/QC system used for the set of activity data as well as the methods and emission factors for GHGs for the needs of CLRTAP/NECD inventories and providing further details on its implementation in the IIR (general and sectoral descriptions). | § 33 40 | § 16 69 84 87 103 105 | | | | | | | No | Ongoing discussion |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| Transparency | | Inaccuracies were found in the use of notation keys and it is recommended to justify the use of notation keys in the IIR for each particular sector. | § 38 | § 19 | | | | | | | Yes | Information tables for NE & IE were added to the completeness chapter of the current IIR |
| Transparency | | Provide more detailed information on the rationale for recalculations at a sectoral level to complement the information already provided in the recalculation tables per pollutant. | § 30 43 90 107 | | | | | | | | Yes | |
| Transparency | 1A2a\1A2b\2C | For iron & steel there is a mix of reporting under 1A2a (PM & CO) 2C1 (NOx SOx VOC NH3) and "NE" (HMs and POPs). For non ferrous metals similar issues are observed. The recommendation is to explain the rationale for reporting in different source categories as well the rationale for NEs. NE reporting should be avoided as much as possible e.g. by applying Guidebook Tier 1 EFs. | § 48 49 | | | | | | | | Yes | The reporting in the different source categories is explained in the IIR. |

[illegible]

[illegible]

| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
|--------------|-------------|---|---------------|-------------|-----------------|-----------|-----------|-----------|-----------|-----------|--------------|---|
| Completeness | 5A\5C\5D | The inventory regarding Waste is currently not complete with missing estimates for several source categories. | § 102 | § 134 135 | | | | | | | Yes | Industrial wastewater emissions implemented since 2021 reporting. Solid waste emissions implemented since 2020 reporting. Domestic wastewater emissions implemented since 2018 reporting. 5.C completed |
| Completeness | 5E | Although the Guidebook has methods for car and house fires in Chapter 6 it may be more transparent to include these in Chapter 7 as Chapter 6D is more focused on compost and sludge. The ERT encourages Germany to consider including some of these emissions in the next submissions. | § 116 | § 139 | DE-5A-2017-0003 | | | | | | Yes | |
| Completeness | 6 | Consider currently missing sources: NH3 emissions from Cats and Dogs from Zoo animals and human ammonia emissions etc. | § 116 | | | | | | | | Partly | Car and house fires have been included for quite a while now (5E). Human NH3 emissions are considered in 6A. Pets will be considered in sub2024. |
| Aspect | Sector | Finding summary | CLRTAP 2010 | CLRTAP 2014 | NECD 2017 | NECD 2018 | NECD 2019 | NECD 2020 | NECD 2021 | NECD 2022 | Implemented? | Official Comment for IIR |
| Accuracy | | Implement a (qualitative and quantitative) uncertainty analysis and use the results to prioritize improvements to the inventory | § 20 24 | § 32 44e 85 | | | | | | | Yes | |
| Accuracy | 1A1b\1A1c\2 | Improvement from Tier 2 to Tier 3 using plant-specific data for some industrial processes including cement production as well as for large combustion plants (e.g. 1A1b 1A1c) | § 19 41 45 46 | | | | | | | | Partly | Included for large combustion plants no plant-specific data for cement production |
| Accuracy | 2A1 | Cement production is a key source for Hg HCB and for NOx PM10 and PAH but Tier 1 is used. The ERT encourages Germany to use plant-specific data collected as part of the LCPD IPPC and E-PRTR to develop a tier 2 or 3 methodology in the near future and to document these in its IIR. | § 79 | § 88 | | | | | | | Yes | plant-specific data approach is not planned |

[illegible]