

# Adjustment DE-A regarding NO<sub>x</sub> from Road Vehicles

## PREFACE

When deriving proposals for national emission ceilings for negotiations of the 1999 Gothenburg Protocol, sector-specific emission estimates for the year 2010 were calculated at IIASA using a set of scenarios which assumed various technological abatement measures, policy incentives, and legislation available / in place or planned at that time. As a result, the 2010 emission by road transport in Germany was estimated at NO<sub>x</sub> (IIASA, 1999) <sup>1)</sup>. The over-all 2010 national emission ceiling (NEC) for NO<sub>x</sub> was set to 1,081 kt. When negotiating the EU NEC Directive two years later, Germany agreed to reduce its NO<sub>x</sub> emissions further, resulting in a NEC of 1,051 kt.

In its 2016 NEC emissions reporting, Germany provided a national total for NO<sub>x</sub> emissions of 1,337 kt for 2010. However, this total includes emissions from agricultural soils and other source categories not accounted for when setting the NEC. In addition, some assumptions made in 1999, including on emission factors from road traffic, turned out to be wrong in reality. Like in many other European countries, non-compliance with the 2010 NEC as set in 1999 was partly not caused by failed national mitigation policies, but by changes beyond the control of, and unforeseen by, the individual Party or Member State.

In order to differentiate such changes from policy failures in the responsibility of the individual Parties to the Gothenburg Protocol, a procedure (Inventory Adjustment) allowing the adjustment of emissions resulting from new emission categories, changes in estimation methodologies, emission factors etc. provided within the EMEP/EEA Guidebook, or other effects beyond national control with respect to complying to emission reduction obligations (EB, 2012 a & c) <sup>2), 3)</sup> was agreed. This procedure is applicable also for existing NECs (EB, 2012b) <sup>4)</sup>.

With respect to road transport, such an unforeseeable effect was the partial failure of several so-called "Euro norms" set on the EU level to reduce emissions from road vehicles. In this report, Germany presents an estimate of the NO<sub>x</sub> emissions resulting from the partial failure of the mitigation policy reflected by the Euro norms, and lays out the calculations leading to these estimates.

## REASONS FOR MISSING THE GOTHENBURG CEILINGS

The TREMOD methodology applied for estimating emissions from road transportation in Germany has changed over time. These changes include updates of emission factors (EF) for various pollutants and other changes such as an extension of vehicle classification (and thus inclusion of emission factors associated with these new vehicle sub-categories) to improve the estimation's accuracy.

The main changes occurred for the emission factors and for the Heavy Duty Vehicles (HDV) fleet structure. This last point led to changes in emissions because of the reallocation of activities (consumption/traffic) between the sub-categories of vehicles.

For the formalism of the adjustments, it is difficult to flag whether the modifications for road transport are due to "methodological changes" or due to "changes of emission factor". Therefore, only the term "change of methodology" will be used (even if at the NFR reporting level this may seem like a simple change in EFs).

So far as road transport is concerned, the inability to attain the emission ceiling is most likely to have been affected by a combination of technological changes within the fleet (which of course made their way into the several versions of TREMOD) combined with greater than originally expected dieselisation of the fleet.

## ANALYSING THE PROBLEM: THE EUROPEAN PERSPECTIVE BASED ON COPERT

Already in 2011, these effects were demonstrated by Ntziachristos and Papageorgiou (2011). Here, the impacts of changing model versions and activity data in the context of meeting the EU NEC Directive ceiling commitments were examined for four European countries including Germany. Unfortunately, this comparison study was carried out within a COPERT environment. Therefore, the results gained cannot be transferred to the German TREMOD environment on a one-to-one level but nonetheless allow a highly illustrative insight in the reasons for not meeting the set ceiling. The study modeled fuel consumption and NO<sub>x</sub> emissions for four selected countries (Germany, France, Netherlands and Belgium) and found higher NO<sub>x</sub> emissions were estimated for the road transport sector than originally modelled by the RAINS model of IIASA (which underpinned the setting of 2010 ceilings). For Germany, this study shows that with the same activity data set (LIFE+

EC4MACS data from Amann et al. (2010)), NO<sub>x</sub> emissions estimated with COPERT II vs. COPERT 4 (v8.0) increase from 410 kt to 518 kt due to methodological changes, a difference of 282 kt. An additional consideration of changes in AD would lead to 620 kt of NO<sub>x</sub>. However, as changes in AD are no valid adjustment reason, the latter value is for information only.

This was mainly due to: \* NO<sub>x</sub> "artificial" current emissions = virtual current emissions assuming no changes in emission factors emission factors updated in COPERT 4 that did not follow the reductions as set by the emission standards for diesel passenger cars; \* important part of diesel fuel consumption in the total fuel consumption of the road traffic.

The results of this study showed that it is the combination of different parameters which might affect the ability (to different extents) of a Party to attain the emission ceilings. In other words, the exceeding of NO<sub>x</sub> ceilings for road transport is due to:

### Changes in methodology and emission factors

As these technologically driven changes (as reflected in the evolution of the different so-called Euro norms) lie outside the country's responsibility, current methodology and EFs have to be adjusted in a way to allow the comparison of the actual inventory and the Gothenburg ceilings.

### Changes in the activity data

As the development of mileage driven and fuels used within a country (Germany: stronger dieselisation then originally expected) is of the country's responsibility, this effect has to be excluded from any adjustment estimation.

## IN-COUNTRY ANALYSIS: THE TREMOD PERSPECTIVE

### INITIAL ASSUMPTION

In order to estimate the effect of NO<sub>x</sub> emissions resulting from the failure of the so-called Euro norms, the following procedure has been agreed by expert review teams in the last two years:



**proposed amount of adjustable emissions = current AD x current EF - current AD x original EF = current AD x (current EF - original EF)  
= current EM - "artificial" current EM<sup>1</sup>**

<sup>1</sup> "artificial" current emissions = virtual current emissions assuming no changes in emission factors



$$\begin{aligned} EM_{\text{adjustment}} &= AD_{\text{current}} * EF_{\text{current}} - AD_{\text{current}} * EF_{\text{original}} \\ &= AD_{\text{current}} * (EF_{\text{current}} - EF_{\text{original}}) \\ &= EM_{\text{current}} - EM_{\text{current "artificial"}} \end{aligned}$$

with

- **EM „adjustment,,** = amount of emissions to be subtracted from National Totals
- **AD „current,,** = AD from latest TREMOD version as used for current submission
- **EF „current,,** = EF from latest TREMOD version as used for current submission
- **EF „original,,** = EF from TREMOD version used at the time NEC ceilings were set (here: TREMOD 3.1)
- **EM „current,,** = EM estimated from AD and EF from latest TREMOD version = EM reported for NFR 1.A.3.b with latest submission
- **EM „current-“artificial”,,** = EM estimated from AD from latest TREMOD version and EF from TREMOD version used at the time NEC ceilings were set (here: TREMOD 3.1)

### APPLYING THE ORIGINAL METHODOLOGY

## FRAMEWORK INFORMATION

The methodology used for estimating Germany's exhaust emissions from road transport when determining emissions ceilings of the Gothenburg Protocol (1999), was the second version of the EMEP/CORINAIR guidebook corresponding to COPERT II software. This method proposed NO<sub>x</sub> emission factors for

- passenger cars (PC): up to Euro 1
- light commercial vehicles (LCV2): up to Euro 1
- heavy duty vehicles (HDV): pre-EURO I only (conventional)

Back then, without better knowledge, the emission factors for the most recent standards were derived by directly applying the expected reductions in emission standards.

However, as Germany does not use COPERT for compiling its road transport emissions inventory but a national model called TREMOD, the following comparison has to be carried out between the oldest version of TREMOD still available and the version as applied for the current inventory submission (2021).

Unfortunately, the oldest TREMOD version available for such comparison is TREMOD 3.1 from 2002<sup>5)</sup>, including the following set of NO<sub>x</sub> emission factors:

- passenger cars (PC): up to Euro 4
- light commercial vehicles (LCV): up to Euro 4
- heavy duty vehicles (HDV) only up to EURO V

However, as this version includes the technological development since 1999 (when the ceilings were set based on COPERT II), the results from this analysis and the adjustment proposal based upon these results are likely to slightly underestimate the effect of technological changes since 1999 and must therefore be considered conservative.

## THE COMPARISON

### Application of the original NO<sub>x</sub> methodology to the current road transport background activity data

The *basic activity data* (such as over-all fuel sold and traffic mileages by vehicle type, by fuel or by Euro regulation) implemented in TREMOD 3.1 differ significantly from those of the current TREMOD version especially for the more recent years as of 2005. In addition, *specific activity data* (such as fuel consumptions per vehicle type, per fuel or per Euro regulation) strongly depend on the TREMOD version.

Within this report, Germany re-estimates the NO<sub>x</sub> emission within the TREMOD 3.1 model. To isolate the requested information, the original TREMOD 3.1 activity data was combined with emission factors from both TREMOD 3.1 and the currently used TREMOD 6.12 (Knörr et al., 2020a)<sup>6)</sup>.

### Description of the updated methodology used

The updated methodology, used in 2019 (for NFR submission 2021) and implemented in version 6.12 of the TREMOD software, considers emission factors of

- passenger cars (PC) up to Euro 6d
- light commercial vehicles (LCV) up to Euro 6d
- heavy duty vehicles (HDV) up to EURO VI

and

- motorized two-wheelers (M2W) up to Euro 4

### Comparison of emission estimates made using the original and updated methodologies

The values of NO<sub>x</sub> emissions presented in the table below are estimated with:

- TREMOD 3.1 model equations as initial methodology

and ,

- TREMOD 6.12 equations as methodology applied for NEC submission 2021.

The activity data applied to initial (here: oldest available) and most recent methodology, are those of the latest inventory provided with NEC submission 2021.

Table 1: Resulting adjustment proposal 2020

for year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b>proposed adjustment</b>	<b>-296.1</b>	<b>-300.7</b>	<b>-300.4</b>	<b>-305.2</b>	<b>-294.9</b>	<b>-274.9</b>	<b>-250.9</b>	<b>-221.1</b>	<b>-179.6</b>	<b>-144.8</b>

The following screenshots show the TREMOD 3.1 / TREMOD 6.12 implementation comparisons per vehicle type/fuel/Euro regulation.

### **Activity Data**

- **current**: from TREMOD 6.12, as reported with the latest inventory submission
- **adjusted**: has to be similar to **current** AD!
- **difference**: as only recent AD are to be used for adjustment estimations, this value must be zero!

### **Implied Emission Factor**

- **current**: representing the ratio of current emissions and current AD
- **adjusted**: representing the ratio of adjusted emissions and current AD
- **difference**: shows percentual difference

### **NO<sub>x</sub> Emissions**

- **current**: from TREMOD 6.12, as reported with the latest inventory submission
- **adjusted**: estimated based on TREMOD 3.1 methodology and TREMOD 6.12 AD
- **adjustment**: adjusted emissions minus current emissions
- **difference**: percentual difference between current and adjusted emissions







Adjustment details for 2023

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions				
		current	adjusted	difference	current	adjusted	difference	current	adjusted	adjustment	difference	
		in [t]	in [t]	in [%]	in [g/t]	in [g/t]	in [%]	in [kg]	in [kg]	in [kg]	in [%]	
1.A.3.a.i - Passenger Cars	Gasoline	pre-Cars	11,561	11,561	0%	607.72	635.38	-5%	7,035,041	6,189,785	-836,256	-12%
		Car 1	47,487	47,487	0%	349.56	341.60	-2%	16,571,746	11,426,129	-5,145,617	-31%
		Car 2	72,781	72,781	0%	164.27	137.92	-16%	13,487,749	10,035,380	-3,452,369	-26%
		Car 3	189,443	189,443	0%	63.99	72.62	14%	6,927,963	7,875,172	947,209	14%
		Car 4	488,541	488,541	0%	45.29	45.13	-1%	18,541,881	18,436,736	-105,145	-1%
		Car 5	181,961	181,961	0%	18.61	45.13	143%	1,897,355	4,681,311	2,783,956	143%
	Car 6	282	282	0%	25.06	45.13	78%	7,339	12,736	5,397	74%	
	Gasoline total	790,957	790,957	0%	65.73	78.88	20%	64,379,943	58,577,229	-5,802,715	-9%	
	pre-Cars	1,487	1,487	0%	311.98	254.56	-18%	463,963	263,922	-199,041	-43%	
	Car 1	4,660	4,660	0%	257.79	266.44	-11%	1,980,364	1,717,787	-262,577	-13%	
	Car 2	33,967	33,967	0%	408.82	279.27	-46%	13,987,432	7,445,646	-6,541,787	-46%	
	Car 3	183,539	183,539	0%	564.82	176.63	-69%	58,389,037	10,434,837	-47,954,200	-82%	
	Car 4	234,943	234,943	0%	398.41	146.46	-63%	91,724,188	34,488,997	-57,235,191	-62%	
	Car 5	173,112	173,112	0%	434.89	146.46	-66%	75,284,364	25,353,375	-49,930,989	-66%	
	Car 6	1,557	1,557	0%	259.84	146.46	-44%	484,664	220,086	-264,578	-54%	
Diesel Oil total	555,245	555,245	0%	415.96	158.66	-62%	242,962,982	88,096,699	-154,866,283	-64%		
PKs Total	1,386,202	1,386,202	0%	234.61	152.29	-35%	386,442,896	146,671,927	-239,770,969	-62%		
pre-Cars	962	962	0%	632.39	645.95	2%	487,779	621,160	133,381	27%		
Car 1	232	232	0%	803.24	383.22	-52%	189,985	70,295	-119,690	-63%		
Car 2	989	989	0%	271.96	195.74	-28%	268,154	183,588	-84,566	-31%		
Car 3	835	835	0%	89.38	98.33	10%	74,623	82,082	7,459	10%		
Car 4	2,030	2,030	0%	38.49	47.58	24%	78,155	96,611	18,456	24%		
Car 5	610	610	0%	16.38	47.58	192%	9,941	29,011	19,070	192%		
Car 6	0	0	0%	15.37	47.58	210%	2	6	4	210%		
Gasoline total	5,657	5,657	0%	218.93	193.15	-25%	1,238,520	1,092,667	-145,853	-12%		
pre-Cars	3,281	3,281	0%	424.48	386.79	-9%	1,368,754	982,093	-376,661	-28%		
Car 1	3,666	3,666	0%	399.34	276.24	-30%	1,445,963	787,034	-658,929	-46%		
Car 2	8,479	8,479	0%	336.46	193.39	-42%	2,852,325	1,629,772	-1,222,553	-43%		
Car 3	23,785	23,785	0%	558.53	150.44	-73%	13,050,281	3,585,082	-9,465,199	-73%		
Car 4	59,485	59,485	0%	454.22	89.85	-80%	29,359,078	5,337,395	-24,021,683	-82%		
Car 5	15,964	15,964	0%	442.70	89.85	-80%	7,040,461	1,420,906	-5,619,555	-80%		
Car 6	1	1	0%	151.94	89.85	-41%	122	72	-50	-41%		
Diesel Oil total	114,350	114,350	0%	485.91	126.17	-74%	55,186,382	13,741,354	-41,445,028	-75%		
LNAs Total	129,088	129,088	0%	469.51	125.65	-74%	56,344,963	14,834,696	-41,510,267	-74%		
pre-Cars	1,326	1,326	0%	1091.48	1919.45	4%	1,410,640	1,352,283	-58,357	-4%		
Car 1	1,248	1,248	0%	727.34	751.15	3%	987,476	937,184	-50,292	-5%		
Car 2	7,780	7,780	0%	783.46	643.34	-18%	6,085,091	4,997,478	-1,087,613	-18%		
Car 3	14,483	14,483	0%	629.94	437.61	-31%	9,073,197	6,089,744	-2,983,453	-33%		
Car 4	5,331	5,331	0%	468.90	361.86	-23%	2,642,179	1,875,777	-766,402	-29%		
Car 5	30,752	30,752	0%	347.84	182.99	-47%	7,219,663	3,787,467	-3,432,196	-47%		
Car 6	73	73	0%	64.52	182.99	284%	3,961	13,296	9,334	284%		
Diesel Total	30,962	30,962	0%	533.28	384.33	-28%	27,141,913	19,945,288	-7,196,625	-27%		
pre-Cars	6,922	6,922	0%	1036.95	758.82	-27%	7,107,543	5,252,345	-1,855,198	-27%		
Car 1	3,630	3,630	0%	749.70	570.57	-24%	2,721,326	2,071,111	-650,215	-24%		
Car 2	23,577	23,577	0%	811.27	516.43	-37%	19,322,253	12,175,855	-7,146,398	-37%		
Car 3	96,726	96,726	0%	634.65	370.21	-42%	61,287,137	35,848,685	-25,438,452	-42%		
Car 4	50,650	50,650	0%	356.50	288.44	-19%	19,982,680	14,880,877	-5,101,803	-26%		
Car 5	485,981	485,981	0%	261.24	152.32	-42%	116,149,955	61,626,577	-54,523,378	-47%		
Car 6	2,380	2,380	0%	189.487	360.323	189%	189,487	360,323	170,836	223%		
Diesel Total	589,585	589,585	0%	385.33	224.69	-41%	224,829,180	132,064,753	-92,764,427	-41%		
pre-Cars	6,780	6,780	0%	122.76	151.03	23%	822,530	1,011,520	188,990	23%		
Car 1	4,386	4,386	0%	134.61	171.39	26%	536,615	738,050	201,435	38%		
Car 2	3,287	3,287	0%	136.22	184.95	43%	445,087	636,833	191,746	43%		
Car 3	3,994	3,994	0%	39.66	184.95	382%	158,286	778,616	620,330	392%		
Car 4	0	0	0%	0	0	0%	0	0	0	0%		
Car 5	0	0	0%	0	0	0%	0	0	0	0%		
Motor Total	18,288	18,288	0%	167.41	175.28	5%	1,982,548	3,163,438	1,180,890	60%		
1.A.3.b - Road Transport	Total	2,084,964	2,084,964	0%	295.79	151.71	-49%	616,721,438	296,381,343	-320,340,094	-48%	

Adjustment details for 2023

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions				
		current	adjusted	difference	current	adjusted	difference	current	adjusted	adjustment	difference	
		in [t]	in [t]	in [%]	in [g/t]	in [g/t]	in [%]	in [kg]	in [kg]	in [kg]	in [%]	
1.A.3.a.i - Passenger Cars	Gasoline	pre-Cars	11,680	11,680	0%	618.27	619.35	0%	7,011,641	5,967,452	-1,044,189	-15%
		Car 1	37,743	37,743	0%	353.78	341.68	-3%	13,362,986	9,129,495	-4,233,491	-32%
		Car 2	62,680	62,680	0%	189.93	139.33	-27%	11,889,922	8,722,244	-3,167,678	-27%
		Car 3	97,792	97,792	0%	68.38	73.19	9%	6,491,618	7,156,920	665,303	10%
		Car 4	387,911	387,911	0%	47.22	46.52	-1%	18,790,345	18,589,937	-200,407	-1%
		Car 5	138,063	138,063	0%	18.68	46.52	150%	2,583,150	6,439,691	3,856,541	150%
	Car 6	2,714	2,714	0%	25.99	46.52	79%	70,526	126,237	55,711	79%	
	Gasoline total	748,116	748,116	0%	88.35	74.85	-16%	69,190,887	56,671,797	-12,519,090	-18%	
	pre-Cars	987	987	0%	112.28	148.56	33%	433,081	348,138	-84,943	-20%	
	Car 1	5,625	5,625	0%	298.42	266.79	-11%	1,678,472	1,640,688	-37,784	-2%	
	Car 2	28,437	28,437	0%	408.64	279.91	-46%	11,963,522	6,253,531	-5,709,991	-48%	
	Car 3	92,795	92,795	0%	574.33	176.67	-69%	53,284,956	10,979,373	-42,305,583	-79%	
	Car 4	222,583	222,583	0%	393.55	149.27	-62%	87,598,471	33,225,586	-54,372,885	-62%	
	Car 5	233,766	233,766	0%	435.42	149.27	-66%	101,787,275	34,884,788	-66,902,487	-66%	
	Car 6	4,536	4,536	0%	259.53	149.27	-42%	5,177,151	677,045	-4,500,106	-87%	
Diesel Oil total	589,131	589,131	0%	437.54	158.75	-64%	257,533,128	83,699,698	-173,833,430	-64%		
PKs Total	1,338,247	1,338,247	0%	217.42	111.37	-49%	317,723,735	148,576,886	-169,146,849	-53%		
pre-Cars	184	184	0%	831.81	645.96	-22%	968,320	729,293	-239,027	-25%		
Car 1	836	836	0%	274.42	291.18	7%	229,520	188,285	-41,235	-18%		
Car 2	784	784	0%	52.66	191.79	36%	72,691	79,780	7,089	10%		
Car 3	1,089	1,089	0%	43.70	48.89	11%	77,284	82,833	5,549	7%		
Car 4	966	966	0%	16.67	48.89	192%	15,187	47,268	31,081	192%		
Car 5	1	1	0%	17.68	48.89	176%	26	72	46	176%		
Gasoline total	5,578	5,578	0%	262.86	184.67	-30%	1,131,299	1,026,727	-104,572	-9%		
pre-Cars	2,754	2,754	0%	424.37	286.79	-33%	1,988,757	944,928	-1,043,829	-53%		
Car 1	2,948	2,948	0%	399.75	276.25	-30%	1,166,782	634,588	-532,194	-46%		
Car 2	6,982	6,982	0%	336.92	193.38	-42%	2,246,147	1,260,074	-986,073	-44%		
Car 3	20,421	20,421	0%	569.12	150.38	-73%	11,437,995	3,070,913	-8,367,082	-73%		
Car 4	55,887	55,887	0%	497.72	90.45	-82%	27,775,440	5,048,416	-22,727,024	-82%		
Car 5	29,024	29,024	0%	441.97	90.45	-80%	13,181,305	2,687,664	-10,493,641	-80%		
Car 6	41	41	0%	151.26	90.45	-40%	6,160	3,688	-2,472	-40%		
Diesel Oil total	118,777	118,777	0%	488.66	174.93	-65%	57,083,513	13,656,488	-43,427,025	-76%		
LNAs Total	124,354	124,354	0%	468.54	198.03	-58%	58,214,142	14,67				

Adjustment details for 2024

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions				
		current	adjusted	difference	current	adjusted	difference	current	adjusted	adjustment	difference	
		kg [t]	kg [t]	%	in [g/t]	in [g/t]	in [%]	in [kg]	in [kg]	in [kg]	in [kg]	
1.A.3.a.i. Passenger Cars	Gasoline	pre-Cars	11,647	11,647	0%	812.37	848.11	-11%	7,132,680	6,337,484	-796,844	-11%
		Car 1	30,667	30,667	0%	358.77	343.93	-32%	11,082,246	7,480,541	-3,621,706	-32%
		Car 2	53,486	53,486	0%	196.58	140.31	-29%	10,514,477	7,584,432	-2,918,844	-29%
		Car 3	87,374	87,374	0%	69.31	73.93	7%	8,965,589	6,459,797	-404,218	-7%
		Car 4	387,159	387,159	0%	49.16	47.80	-3%	19,069,585	18,536,009	-523,557	-3%
		Car 5	171,270	171,270	0%	18.59	47.80	151%	3,183,282	0,187,581	-5,044,209	151%
	Gasoline total	752,526	752,526	0%	76.33	73.89	-3%	57,215,533	54,998,501	-2,216,812	-3%	
	pre-Cars	1,341	1,341	0%	311.73	284.66	-9%	417,987	364,246	-52,722	-9%	
	Car 1	4,982	4,982	0%	298.92	287.28	-11%	1,482,284	1,387,643	-155,951	-11%	
	Car 2	23,934	23,934	0%	408.71	320.45	-21%	9,734,484	5,276,480	-4,458,004	-21%	
	Car 3	82,749	82,749	0%	589.53	176.81	-69%	48,481,830	14,796,249	-33,685,589	-69%	
	Car 4	211,237	211,237	0%	397.27	151.77	-62%	83,917,680	32,059,973	-51,857,706	-62%	
	Car 5	285,011	285,011	0%	436.38	151.77	-65%	124,721,396	43,370,300	-81,343,896	-65%	
	Car 6	16,081	16,081	0%	259.34	151.77	-41%	4,170,580	2,480,686	-1,629,814	-41%	
	Diesel oil total	626,045	626,045	0%	415.87	159.12	-62%	272,876,061	89,643,892	-173,262,169	-62%	
Flx Total	1,338,571	1,338,571	0%	218.44	152.15	-31%	338,091,584	154,642,853	-175,478,261	-31%		
1.A.3.b.i. Light Duty Vehicles (LDV)	Gasoline	pre-Cars	986	986	0%	838.14	646.96	-23%	563,683	378,724	-184,848	-23%
		Car 1	173	173	0%	868.27	389.96	-54%	160,074	53,576	-106,499	-54%
		Car 2	748	748	0%	284.73	287.11	21%	212,888	154,839	-58,029	-27%
		Car 3	771	771	0%	98.02	185.21	7%	75,982	81,070	5,078	7%
		Car 4	1,087	1,087	0%	43.47	50.15	15%	81,139	83,618	12,479	15%
		Car 5	1,374	1,374	0%	17.11	50.15	183%	23,517	68,918	45,401	183%
	Car 6	17	17	0%	18.06	50.15	179%	212	670	457	179%	
	Gasoline total	5,845	5,845	0%	198.34	176.49	-7%	1,112,584	1,031,652	-80,972	-7%	
	pre-Cars	2,537	2,537	0%	428.16	386.79	-21%	1,985,979	1,762,259	-223,729	-21%	
	Car 1	2,589	2,589	0%	391.82	276.25	-29%	987,136	639,888	-347,328	-29%	
	Car 2	6,087	6,087	0%	338.81	133.25	-62%	1,985,985	1,180,889	-805,128	-42%	
	Car 3	18,220	18,220	0%	571.75	150.58	-74%	10,417,076	2,742,056	-7,675,020	-74%	
	Car 4	52,361	52,361	0%	499.70	91.69	-82%	26,184,486	4,703,796	-21,494,748	-82%	
	Car 5	46,749	46,749	0%	438.64	91.69	-79%	20,496,234	4,258,626	-16,237,708	-79%	
	Car 6	187	187	0%	151.18	91.69	-40%	29,829	17,974	-11,855	-40%	
Diesel oil total	128,578	128,578	0%	415.56	170.94	-77%	61,146,525	14,267,237	-46,879,318	-77%		
LDV Total	134,423	134,423	0%	463.56	153.85	-75%	62,259,160	15,298,849	-46,968,311	-75%		
1.A.3.b.ii. Heavy Duty Vehicles (HDV)	Diesel Oil	pre-Cars	984	984	0%	1059.48	1819.23	-5%	1,062,384	1,062,921	-48,443	-5%
		Car 1	837	837	0%	728.32	1700.99	3%	699,222	628,359	-18,127	3%
		Car 2	5,588	5,588	0%	784.35	643.67	-18%	4,384,320	3,623,441	-760,877	-18%
		Car 3	11,221	11,221	0%	621.20	458.38	-27%	7,082,740	5,143,528	-1,939,228	-27%
		Car 4	4,278	4,278	0%	461.90	361.79	-21%	1,972,610	1,584,978	-407,632	-21%
		Car 5	32,042	32,042	0%	358.55	183.99	-49%	7,726,911	4,065,532	-3,671,389	-49%
	Car 6	4,182	4,182	0%	42.78	183.99	330%	178,913	789,476	610,563	330%	
	Diesel Total	49,143	49,143	0%	468.37	339.99	-27%	23,017,115	16,788,234	-6,228,881	-27%	
	pre-Cars	4,782	4,782	0%	1034.34	737.35	-29%	4,945,942	3,625,898	-1,320,144	-29%	
	Car 1	2,285	2,285	0%	748.66	581.41	-22%	1,600,088	1,237,759	-362,329	-22%	
	Car 2	13,023	13,023	0%	817.90	510.28	-37%	11,146,862	6,655,738	-4,491,124	-37%	
	Car 3	54,085	54,085	0%	632.52	384.41	-42%	36,589,677	19,927,835	-16,661,841	-42%	
	Car 4	34,037	34,037	0%	396.37	285.34	-30%	13,481,100	9,711,896	-3,779,202	-30%	
	Car 5	389,263	389,263	0%	262.92	153.66	-42%	110,112,782	69,688,043	-40,424,749	-42%	
	Car 6	34,214	34,214	0%	63.95	153.66	189%	3,937,089	11,368,682	7,421,413	189%	
Trucks Total	572,154	572,154	0%	314.89	186.69	-38%	179,874,133	112,285,562	-67,588,551	-38%		
1.A.3.b.iii. Motorised Two-Wheelers (M2W)	pre-Cars	6,185	6,185	0%	122.85	158.04	29%	795,185	974,388	218,152	29%	
	Car 1	3,837	3,837	0%	134.71	174.84	40%	478,514	670,859	192,346	40%	
	Car 2	3,365	3,365	0%	128.94	186.25	52%	433,874	680,379	246,504	52%	
	Car 3	5,365	5,365	0%	38.53	186.25	386%	209,722	1,041,189	831,467	386%	
	Car 4	0	0	0%	0	0	0%	0	0	0	0%	
	Car 5	0	0	0%	0	0	0%	0	0	0	0%	
M2W Total	18,623	18,623	0%	108.99	176.84	78%	1,828,284	3,386,194	1,488,499	78%		
1.A.3.b. Road Transport Total	2,153,563	2,153,563	0%	277.27	140.35	-49%	597,120,297	382,252,271	-214,868,025	-49%		

Adjustment details for 2025

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions				
		current	adjusted	difference	current	adjusted	difference	current	adjusted	adjustment	difference	
		kg [t]	kg [t]	%	in [g/t]	in [g/t]	in [%]	in [kg]	in [kg]	in [kg]	in [kg]	
1.A.3.a.i. Passenger Cars	Gasoline	pre-Cars	11,380	11,380	0%	833.23	848.11	-1%	7,266,112	6,191,942	-1,074,168	-14%
		Car 1	36,112	36,112	0%	371.34	345.71	-34%	8,963,881	5,924,574	-3,039,298	-34%
		Car 2	42,925	42,925	0%	267.78	142.68	-32%	8,918,785	6,089,659	-2,818,648	-32%
		Car 3	72,871	72,871	0%	73.96	74.74	1%	5,381,361	5,446,237	64,897	1%
		Car 4	353,474	353,474	0%	52.36	49.62	-6%	18,485,637	17,326,221	-1,159,416	-6%
		Car 5	180,783	180,783	0%	19.11	49.62	151%	3,454,481	0,881,456	-5,408,575	151%
	Car 6	29,612	29,612	0%	26.70	49.62	84%	790,791	1,451,433	660,752	84%	
	Gasoline total	715,156	715,156	0%	74.38	71.73	-3%	53,190,787	51,280,983	-1,889,805	-3%	
	pre-Cars	1,382	1,382	0%	311.32	284.66	-9%	387,913	339,733	-48,180	-9%	
	Car 1	4,279	4,279	0%	298.14	287.84	-3%	1,261,930	1,129,989	-132,821	-10%	
	Car 2	19,689	19,689	0%	407.80	320.98	-20%	8,013,687	4,338,179	-3,674,788	-20%	
	Car 3	71,044	71,044	0%	595.81	179.04	-70%	42,271,648	12,719,962	-29,551,686	-70%	
	Car 4	182,410	182,410	0%	401.42	154.07	-62%	77,237,655	29,644,450	-47,593,206	-62%	
	Car 5	364,346	364,346	0%	434.67	154.07	-65%	132,290,433	46,080,424	-86,408,809	-65%	
	Car 6	52,576	52,576	0%	259.76	154.07	-41%	13,657,082	0,180,384	-5,556,778	-41%	
Diesel oil total	645,565	645,565	0%	426.19	159.89	-62%	275,130,223	183,163,591	-91,966,732	-62%		
Flx Total	1,360,721	1,360,721	0%	245.28	153.52	-37%	328,321,020	154,444,484	-173,876,536	-37%		
1.A.3.b.i. Light Duty Vehicles (LDV)	Gasoline	pre-Cars	979	979	0%	1076.34	1819.23	-26%	1,048,312	986,255	-62,057	-6%
		Car 1	747	747	0%	738.26	171.91	3%	545,471	581,636	16,165	3%
		Car 2	5,211	5,211	0%	787.43	644.46	-18%	4,183,087	3,358,694	-824,393	-18%
		Car 3	11,282	11,282	0%	633.90	458.67	-30%	7,141,732	5,174,989	-1,966,822	-30%
		Car 4	4,586	4,586	0%	469.70	361.99	-23%	2,154,086	1,614,177	-539,829	-25%
		Car 5	34,267	34,267	0%	358.77	184.69	-49%	8,727,068	4,477,641	-4,249,427	-49%
	Car 6	5,224	5,224	0%	63.13	184.69	241%	277,542	964,225	686,684	241%	
	Diesel Total	52,887	52,887	0%	458.96	327.99	-29%	23,987,817	11,149,448	-12,838,379	-29%	
	pre-Cars	4,319	4,319	0%	1034.89	737.35	-29%	4,488,571	3,184,428	-1,294,143	-29%	
	Car 1	1,853	1,853	0%	748.71	583.48	-22%	1,387,291	1,025,251	-362,040	-26%	
	Car 2	11,082	11,082	0%	817.90	510.28	-37%	9,072,943	5,633,460	-3,439,391	-37%	
	Car 3	43,481	43,481	0%	621.55	384.41	-42%	27,460,779	15,734,631	-11,726,147	-42%	
	Car 4	39,233	39,233	0%	396.88	283.72	-30%	11,572,860	8,284,190	-3,278,769	-30%	
	Car 5	308,726	308,726	0%	264.17	153.49	-42%	63,413,973	30,446,496	-32,967,477	-42%	
	Car 6	159,787	159,787	0%	67.48	153.4						



Adjustment details for 2026

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions			
		current	adjusted	difference	current	adjusted	difference	current	adjusted	difference	
		in [t]	in [t]	in [%]	in [g/t]	in [g/t]	in [%]	in [kg]	in [kg]	in [t]	
1.A.3.b.i. Passenger Cars	Gasoline	pre-Cars	11,782	11,782	0%	634.70	644.11	-14%	7,478,914	6,410,967	1,067,947
		Car 1	20,270	20,270	0%	372.25	241.68	-35%	7,545,483	4,986,898	2,558,585
		Car 2	36,082	36,082	0%	212.73	143.11	-33%	7,671,581	5,180,897	2,490,684
		Car 3	83,039	83,039	0%	78.17	75.99	-3%	4,861,482	4,739,259	122,223
		Car 4	334,413	334,413	0%	53.74	50.17	-7%	17,983,984	16,777,445	1,206,539
		Car 5	183,374	183,374	0%	19.09	50.17	163%	3,580,746	9,139,834	5,559,088
	Gasoline total	715,272	715,272	0%	79.93	70.65	-10%	58,736,967	50,535,649	8,201,318	
	Diesel Oil	pre-Cars	1,280	1,280	0%	366.78	254.66	-30%	386,263	339,172	47,091
		Car 1	3,749	3,749	0%	298.38	269.66	-9%	1,122,449	1,011,625	111,424
		Car 2	16,584	16,584	0%	407.19	221.43	-46%	6,729,132	3,863,964	2,865,168
		Car 3	81,398	81,398	0%	802.50	179.24	-78%	36,991,999	11,085,409	25,906,590
		Car 4	175,940	175,940	0%	405.78	156.24	-61%	71,382,220	27,474,096	43,908,124
Car 5		299,654	299,654	0%	433.34	156.24	-64%	130,032,044	46,019,229	84,012,815	
Diesel Oil total	675,119	675,119	0%	418.36	160.76	-61%	277,941,660	188,535,236	89,406,424		
Pkx Total	1,390,391	1,390,391	0%	215.75	134.41	-37%	327,738,627	199,070,885	128,667,742		
1.A.3.b.ii. Light Duty Vehicles (LDV)	Gasoline	pre-Cars	910	910	0%	662.79	640.95	-3%	593,789	581,643	12,146
		Car 1	136	136	0%	908.31	512.78	-43%	122,126	42,425	79,701
		Car 2	540	540	0%	308.39	217.84	-29%	162,311	117,197	45,114
		Car 3	650	650	0%	108.43	111.97	3%	70,432	72,731	-2,299
		Car 4	1,684	1,684	0%	43.06	52.36	21%	73,714	84,003	-10,289
		Car 5	1,724	1,724	0%	19.82	52.36	164%	34,157	80,258	-46,101
	Gasoline total	5,506	5,506	0%	388.27	171.66	-56%	1,968,292	1,693,679	2,744,613	
	Diesel Oil	pre-Cars	2,189	2,189	0%	414.87	286.79	-31%	999,549	985,433	14,116
		Car 1	1,780	1,780	0%	391.89	276.25	-29%	780,189	385,371	394,818
		Car 2	4,223	4,223	0%	323.43	193.71	-40%	1,365,994	876,452	489,542
		Car 3	13,582	13,582	0%	588.91	190.77	-68%	8,084,323	2,949,233	5,135,090
		Car 4	43,141	43,141	0%	504.48	92.40	-82%	21,783,989	3,985,141	17,798,848
Car 5		74,231	74,231	0%	434.16	92.40	-79%	32,223,283	6,688,790	25,534,493	
Diesel Oil total	148,068	148,068	0%	454.12	185.62	-59%	65,712,712	15,276,007	50,436,705		
LDV Total	149,994	149,994	0%	445.21	186.29	-59%	66,781,025	16,229,686	50,551,338		
1.A.3.b.iii. Heavy Duty Vehicles (HDV)	Diesel Oil	pre-Cars	891	891	0%	1076.81	1119.23	-3%	954,197	989,234	-35,037
		Car I	4,375	4,375	0%	731.87	732.27	0%	433,675	446,226	-12,551
		Car II	4,375	4,375	0%	708.25	645.03	-9%	3,440,614	2,822,621	617,993
		Car III	10,333	10,333	0%	632.87	458.91	-28%	6,539,364	4,741,827	1,797,537
		Car IV	4,449	4,449	0%	475.90	382.28	-19%	2,117,218	1,688,081	429,137
		Car V	24,380	24,380	0%	364.38	185.22	-49%	8,935,974	4,617,617	4,318,357
	Diesel Oil total	54,315	54,315	0%	624.73	388.24	-38%	23,082,189	16,685,117	6,397,072	
	Trucks & Lorries	pre-Cars	3,933	3,933	0%	1034.81	737.35	-29%	4,087,249	2,989,379	1,097,870
		Car I	1,555	1,555	0%	748.16	587.92	-21%	1,163,482	789,813	373,669
		Car II	9,875	9,875	0%	817.75	595.52	-27%	7,255,040	4,486,620	2,768,420
		Car III	34,187	34,187	0%	638.31	560.64	-11%	21,553,288	12,251,155	9,302,133
		Car IV	34,287	34,287	0%	394.94	281.86	-29%	9,649,364	6,685,621	2,963,743
Car V		269,735	269,735	0%	267.22	153.90	-43%	74,688,233	39,976,610	34,711,623	
Trucks Total	564,013	564,013	0%	295.31	180.97	-39%	134,431,899	107,496,262	26,935,637		
1.A.3.b.iv. Motorised Two-Wheelers (M2W)	pre-Cars	5,543	5,543	0%	125.59	155.78	24%	696,072	883,289	-187,217	
	Car 1	3,360	3,360	0%	107.11	177.29	39%	407,113	585,796	-178,683	
	Car 2	3,375	3,375	0%	125.94	187.68	50%	421,951	687,078	-265,127	
	Car 3	6,443	6,443	0%	48.36	187.68	281%	209,627	1,273,071	-1,063,444	
	Car 4	66	66	0%	17.47	187.68	1011%	1,134	12,822	-11,688	
M2W Total	19,185	19,185	0%	96.14	181.68	88%	1,885,897	3,452,476	-1,566,579		
<b>1.A.3.b. Road Transport</b>	<b>Total</b>	<b>2,287,339</b>	<b>2,287,339</b>	<b>0%</b>	<b>258.89</b>	<b>137.22</b>	<b>-45%</b>	<b>553,789,558</b>	<b>382,961,820</b>	<b>170,827,738</b>	

Adjustment details for 2027

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions			
		current	adjusted	difference	current	adjusted	difference	current	adjusted	difference	
		in [t]	in [t]	in [%]	in [g/t]	in [g/t]	in [%]	in [kg]	in [kg]	in [t]	
1.A.3.b.i. Passenger Cars	Gasoline	pre-Cars	12,282	12,282	0%	636.73	644.11	-14%	7,814,267	6,648,137	1,166,130
		Car 1	17,449	17,449	0%	372.99	241.68	-35%	6,588,911	4,217,044	2,371,867
		Car 2	30,435	30,435	0%	217.43	147.75	-32%	6,617,570	4,174,149	2,443,421
		Car 3	54,271	54,271	0%	78.48	76.27	-3%	4,254,938	4,139,376	115,562
		Car 4	315,086	315,086	0%	54.96	51.28	-7%	17,315,300	16,151,881	1,163,419
		Car 5	180,240	180,240	0%	19.17	51.28	163%	3,485,382	9,239,815	-5,754,433
	Gasoline total	726,571	726,571	0%	67.56	60.88	-10%	59,026,874	50,534,714	8,492,160	
	Diesel Oil	pre-Cars	1,280	1,280	0%	366.78	254.66	-30%	386,263	340,000	46,263
		Car 1	3,760	3,760	0%	298.17	271.67	-9%	1,082,266	916,182	166,084
		Car 2	13,788	13,788	0%	407.17	222.43	-45%	5,914,130	3,266,985	2,647,145
		Car 3	52,128	52,128	0%	808.95	179.65	-78%	31,698,478	9,384,788	22,313,690
		Car 4	187,947	187,947	0%	418.10	158.34	-61%	64,733,485	24,993,323	39,740,162
Car 5		283,480	283,480	0%	423.95	158.34	-63%	120,187,666	44,073,190	76,114,476	
Diesel Oil total	686,582	686,582	0%	396.65	161.95	-59%	272,126,091	152,890,721	119,235,370		
Pkx Total	1,413,153	1,413,153	0%	245.98	135.83	-45%	321,152,965	163,425,435	157,727,530		
1.A.3.b.ii. Light Duty Vehicles (LDV)	Gasoline	pre-Cars	960	960	0%	661.81	640.95	-3%	612,242	598,978	13,264
		Car 1	134	134	0%	908.23	512.78	-43%	112,083	38,682	73,401
		Car 2	485	485	0%	302.12	221.62	-27%	140,344	102,950	37,394
		Car 3	596	596	0%	119.57	115.38	4%	65,955	68,012	-2,057
		Car 4	1,476	1,476	0%	58.72	53.38	10%	74,877	78,816	-3,939
		Car 5	1,660	1,660	0%	21.73	53.38	146%	35,240	89,034	-53,794
	Gasoline total	6,186	6,186	0%	371.55	167.18	-55%	1,958,799	1,634,211	324,588	
	Diesel Oil	pre-Cars	2,087	2,087	0%	411.41	286.79	-30%	989,499	971,183	18,316
		Car 1	1,538	1,538	0%	398.47	276.25	-29%	680,716	331,158	349,558
		Car 2	3,580	3,580	0%	321.26	193.04	-40%	1,143,793	687,293	456,500
		Car 3	11,684	11,684	0%	595.88	190.79	-68%	6,949,879	1,758,147	5,191,732
		Car 4	39,050	39,050	0%	506.70	93.69	-82%	19,789,647	3,635,035	16,154,612
Car 5		75,789	75,789	0%	432.66	93.69	-78%	32,790,966	7,054,965	25,736,001	
Diesel Oil total	153,284	153,284	0%	454.66	183.89	-60%	65,093,930	15,925,276	49,168,654		
LDV Total	159,470	159,470	0%	414.83	186.35	-55%	66,152,129	16,609,427	49,542,702		
1.A.3.b.iii. Heavy Duty Vehicles (HDV)	Diesel Oil	pre-Cars	736	736	0%	1077.33	1119.23	-3%	789,259	799,425	-10,166
		Car I	411	411	0%	731.87	732.27	0%	389,684	389,622	62
		Car II	3,325	3,325	0%	707.91	645.03	-9%	2,620,087	2,147,480	472,607
		Car III	8,678	8,678	0%	631.33	458.12	-28%	5,478,480	3,984,085	1,494,395
		Car IV	3,823	3,823	0%	474.87	382.48	-19%	1,912,380	1,387,630	524,750
		Car V	21,913	21,913	0%	363.92	185.64	-49%	7,937,976	4,063,686	3,874,290
	Diesel Oil total	43,966	43,966	0%	582.62	288.71	-50%	19,783,981	10,348,826	9,435,155	
	Trucks & Lorries	pre-Cars	3,686	3,686	0%	1034.81	737.35	-29%	3,739,272	2,689,676	1,049,596
		Car I	1,511	1,511	0%	748.83	488.38	-35%	980,842	674,151	306,691
		Car II	7,087	7,087	0%	817.86	595.52	-27%	5,794,876	3,688,026	2,106,850
		Car III	36,086	36,086	0%	638.17	560.64	-11%	21,542,681	12,251,155	9,291,526
		Car IV	30,082	30,082	0%	397.77	279.34	-30%	7,966,414	5,687,496	2,278,918
Car V		264,385	2								

Adjustment details for 2018

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions					
		current	adjusted	difference	current	adjusted	difference	current	adjusted	difference			
		km [t]	km [t]	%	kg [t]	kg [t]	%	kg [t]	kg [t]	%			
1.A.3.a.i - Passenger Cars	Gasoline	pre-Cars	12,219	12,219	0%	637.58	648.11	-15%	7,780,965	6,688,721	-13.02,334	-55%	
		Car 1	14,362	14,362	0%	374.34	341.68	-35%	5,371,161	3,488,643	-1,882,518	-35%	
		Car 2	24,285	24,285	0%	221.97	111.06	-50%	5,360,977	2,688,163	-2,672,814	-50%	
		Car 3	43,642	43,642	0%	89.16	76.96	-14%	3,497,781	3,368,617	-129,164	-4%	
		Car 4	278,738	278,738	0%	55.98	52.30	-7%	15,683,498	14,578,755	-1,104,743	-7%	
		Car 5	186,830	186,830	0%	19.35	52.30	170%	3,238,282	6,725,668	3,487,386	170%	
		Gasoline total	693,027	693,027	0%	64.62	68.36	6%	45,032,296	41,786,837	-3,245,459	-7%	
	Diesel Oil	pre-Cars	1,949	1,949	0%	303.16	342.96	-13%	396,486	548,173	-151,687	-39%	
		Car 1	2,949	2,949	0%	294.17	272.66	-9%	862,432	775,166	-87,267	-9%	
		Car 2	19,784	19,784	0%	407.20	322.87	-21%	4,391,983	2,483,536	-1,908,448	-45%	
		Car 3	49,786	49,786	0%	812.49	180.15	-78%	24,932,029	7,333,241	-17,598,788	-71%	
		Car 4	130,534	130,534	0%	414.71	180.48	-56%	54,133,837	20,937,329	-33,196,508	-48%	
		Car 5	251,212	251,212	0%	416.25	180.48	-56%	104,585,706	40,283,731	-64,301,975	-41%	
		Diesel oil total	238,685	238,685	0%	354.87	180.48	-49%	58,284,140	36,800,446	-21,483,694	-37%	
		Pkcs Total	931,712	931,712	0%	219.49	248.84	-13%	247,596,063	188,768,684	-58,827,379	-24%	
	1.A.3.a.ii - Light Duty Vehicles (LDV)	Gasoline	pre-Cars	917	917	0%	668.33	668.36	0%	994,859	982,852	-12,007	-1%
			Car 1	189	189	0%	911.58	512.78	-45%	88,529	33,895	-54,634	-62%
			Car 2	377	377	0%	303.84	224.45	-26%	114,682	84,133	-30,549	-27%
Car 3			511	511	0%	111.32	116.84	5%	57,282	60,139	2,857	5%	
Car 4			1,275	1,275	0%	52.02	54.36	4%	65,298	69,278	3,980	4%	
Car 5			1,483	1,483	0%	23.70	54.36	129%	35,160	80,626	45,466	129%	
		Gasoline total	6,315	6,315	0%	158.22	180.11	11%	999,199	1,011,136	11,937	1%	
Diesel Oil		pre-Cars	1,872	1,872	0%	411.57	386.79	-6%	771,337	674,432	-96,905	-13%	
		Car 1	1,285	1,285	0%	389.94	276.25	-29%	483,129	272,286	-210,843	-45%	
		Car 2	2,942	2,942	0%	318.56	183.80	-42%	965,289	580,789	-384,500	-40%	
		Car 3	3,363	3,363	0%	558.10	150.74	-73%	5,609,152	1,411,290	-4,197,862	-75%	
		Car 4	33,232	33,232	0%	508.42	93.81	-82%	15,929,185	3,117,457	-12,811,728	-80%	
		Car 5	66,283	66,283	0%	432.92	93.81	-78%	28,694,080	6,217,860	-22,476,220	-78%	
		Diesel oil total	39,482	39,482	0%	158.79	93.81	-41%	5,941,616	3,696,208	-2,245,407	-38%	
		LDVs Total	160,514	160,514	0%	375.86	184.94	-49%	60,343,125	36,851,449	-23,491,676	-39%	
1.A.3.a.iii - Heavy Duty Vehicles (HDV)		Diesel Oil	pre-Cars	547	547	0%	1076.16	1819.23	-41%	589,267	587,147	-2,120	-0%
			Car 1	737	737	0%	732.67	732.67	0%	732,670	736,368	3,698	0%
			Car 2	2,270	2,270	0%	787.83	646.33	-18%	1,789,696	1,447,437	-342,259	-19%
	Car 3		6,757	6,757	0%	628.89	409.32	-35%	4,262,734	3,183,492	-1,079,242	-25%	
	Car 4		3,043	3,043	0%	473.56	362.73	-23%	1,439,790	1,073,333	-366,457	-25%	
	Car 5		18,189	18,189	0%	362.42	186.37	-49%	6,663,265	3,076,016	-3,587,249	-49%	
		Diesel Total	29,670	29,670	0%	64.99	186.37	288%	1,176,026	3,682,314	2,506,288	212%	
	Trucks & Lorries	pre-Cars	3,262	3,262	0%	1034.82	737.35	-29%	3,375,399	2,485,071	-890,328	-26%	
		Car 1	1,094	1,094	0%	747.82	488.39	-34%	918,052	512,378	-405,674	-44%	
		Car 2	5,546	5,546	0%	817.44	581.68	-29%	4,532,195	2,781,518	-1,750,677	-39%	
		Car 3	20,583	20,583	0%	629.54	363.68	-42%	12,967,751	7,277,279	-5,690,472	-44%	
		Car 4	15,912	15,912	0%	368.09	276.23	-25%	6,334,421	4,386,424	-1,947,997	-31%	
		Car 5	154,980	154,980	0%	260.40	154.68	-41%	45,984,153	24,283,399	-21,700,754	-47%	
		Trucks Total	381,799	381,799	0%	68.76	154.68	125%	26,251,482	69,665,898	43,414,416	165%	
		HDVs Total	585,186	585,186	0%	575.18	172.19	-70%	180,173,337	180,730,869	557,532	0%	
	1.A.3.b - Road Transport	Motorised Two-Wheelers (M2W)	pre-Cars	4,940	4,940	0%	128.95	188.61	46%	622,656	783,451	160,795	26%
			Car 1	2,965	2,965	0%	126.94	177.79	41%	374,114	527,294	153,180	41%
			Car 2	3,221	3,221	0%	129.33	188.64	46%	387,596	639,633	252,037	65%
Car 3			6,241	6,241	0%	48.24	188.64	388%	251,126	1,239,688	988,562	388%	
Car 4			1,130	1,130	0%	38.41	188.64	491%	23,066	224,627	201,561	871%	
Car 5			0	0	0%	0.00	188.64						

Adjustment details for 2019

NFR Code	Fuel	Activity Data			Implied Emission Factor			NO <sub>x</sub> Emissions					
		current	adjusted	difference	current	adjusted	difference	current	adjusted	difference			
		km [t]	km [t]	%	kg [t]	kg [t]	%	kg [t]	kg [t]	%			
1.A.3.a.i - Passenger Cars	Gasoline	pre-Cars	13,589	13,589	0%	638.58	648.11	-15%	8,664,621	7,382,686	-1,281,935	-15%	
		Car 1	12,427	12,427	0%	378.32	341.68	-35%	4,761,480	3,083,383	-1,678,097	-35%	
		Car 2	20,086	20,086	0%	225.58	111.06	-51%	4,531,070	1,868,018	-2,662,852	-59%	
		Car 3	39,216	39,216	0%	82.22	76.12	-7%	2,977,840	2,829,186	-148,654	-5%	
		Car 4	295,220	295,220	0%	57.04	53.29	-7%	14,588,285	13,989,621	-598,664	-4%	
		Car 5	180,537	180,537	0%	19.77	53.29	170%	3,173,728	6,584,356	3,410,628	107%	
		Gasoline total	766,031	766,031	0%	62.36	68.45	10%	43,981,947	40,236,025	-3,745,922	-9%	
	Diesel Oil	pre-Cars	2,146	2,146	0%	333.78	372.66	-12%	413,198	574,923	-161,725	-39%	
		Car 1	2,545	2,545	0%	298.89	272.66	-9%	784,913	687,786	-97,127	-12%	
		Car 2	8,891	8,891	0%	407.59	326.16	-20%	3,420,286	2,037,480	-1,382,806	-40%	
		Car 3	33,079	33,079	0%	615.11	180.42	-71%	20,370,125	5,967,483	-14,402,642	-71%	
		Car 4	113,335	113,335	0%	419.17	182.44	-56%	45,668,685	18,085,228	-27,583,457	-61%	
		Car 5	231,784	231,784	0%	419.37	182.44	-56%	95,117,643	37,650,997	-57,466,646	-60%	
		Diesel oil total	273,511	273,511	0%	227.30	182.44	-20%	62,189,239	44,429,184	-17,760,055	-29%	
		Pkcs Total	1,039,542	1,039,542	0%	219.66	248.89	-11%	229,946,089	189,988,982	-40,000,967	-18%	
	1.A.3.a.ii - Light Duty Vehicles (LDV)	Gasoline	pre-Cars	929	929	0%	648.89	668.36	-7%	981,459	981,982	-523	0%
			Car 1	97	97	0%	915.28	512.78	-45%	89,563	39,286	-50,277	-56%
			Car 2	316	316	0%	304.83	224.45	-26%	99,150	70,848	-28,302	-29%
Car 3			447	447	0%	112.68	121.47	8%	50,365	54,283	3,918	8%	
Car 4			1,126	1,126	0%	53.06	54.36	4%	59,652	62,199	2,547	4%	
Car 5			1,361	1,361	0%	25.34	54.36	110%	34,240	74,680	40,440	118%	
		Gasoline total	6,683	6,683	0%	148.38	180.25	19%	976,279	1,044,156	67,877	7%	
Diesel Oil		pre-Cars	1,784	1,784	0%	418.36	386.79	-7%	725,111	641,376	-83,735	-12%	
		Car 1	1,079	1,079	0%	389.52	276.25	-29%	420,285	232,256	-188,029	-45%	
		Car 2	2,234	2,234	0%	318.36	183.80	-42%	737,682	454,630	-283,052	-38%	
		Car 3	7,649	7,649	0%	601.11	150.74	-75%	4,587,943	1,152,711	-3,435,232	-75%	
		Car 4	28,711	28,711	0%	512.20	94.57	-82%	14,780,380	2,715,154	-12,065,226	-82%	
		Car 5	68,714	68,714	0%	434.30	94.57	-78%	25,499,580	5,652,428	-19,847,152	-78%	
		Diesel oil total	109,183	109,183	0%	347.44	181.99	-48%	55,383,535	24,221,446	-31,162,089	-47%	
		LDVs Total	287,765	287,765	0%	376.11	183.97	-49%	96,279,544	11,245,996	-85,033,548	-88%	
1.A.3.a.iii - Heavy Duty Vehicles (HDV)		Diesel Oil	pre-Cars	489	489	0%	1096.20	1819.23	-41%	586,987	476,258	-110,729	-19%
			Car 1	747	747	0%	736.37	732.67	0%	736,370	736,368	-2	0%
			Car 2	1,611	1,611	0%	789.47	646.33	-18%	1,271,445	1,041,621	-229,824	-18%
	Car 3		5,789	5,789	0%	621.62	409.32	-35%	3,686,361	2,623,779	-1,062,582	-29%	
	Car 4		2,747	2,747	0%	473.92	362.84	-24%	1,382,061	969,413	-412,648	-30%	
	Car 5		17,120	17,120	0%	362.91	186.64	-49%	6,213,176	3,180,781	-3,032,395	-49%	
		Diesel Total	25,135	25,135	0%	60.43	186.64	299%	1,519,981	4,696,133	3,176,152	209%	
	Trucks & Lorries	pre-Cars	3,140	3,140	0%	1034.82	737.35	-29%	3,250,020	2,375,443	-874,577	-	

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Adjustment 2014 (accepted) <sup>7), 8)</sup>	-105.6	-101.3	-95.7	-91.7						
Adjustment 2015 (accepted) <sup>9), 10)</sup>	-100.3	-95.5	-89.9	-85.1						
Adjustment 2016 (accepted) <sup>11), 12)</sup>	-151.3	-146.9	-145.1	-142.5	-128.1					
Adjustment 2017 (accepted) <sup>13)</sup>	-151.3	-146.8	-145.0	-142.4	-127.2	-100.9				
Adjustment 2018 (accepted) <sup>14), 15)</sup>	-172.3	-174.5	-177.4	-180.4	-171.5	-148.9	-123.2			
Adjustment 2019 (accepted) <sup>16), 17)</sup>	-172.3	-174.5	-177.4	-180.3	-171.4	-148.8	-123.3	-93.7		
Adjustment 2020 (accepted) <sup>18)</sup>	-297.8	-302.3	-301.3	-306.1	-294.5	-269.0	-244.3	-214.9	-174.6	
<b>Adjustment 2021 (proposal)</b>	<b>-296.1</b>	<b>-300.7</b>	<b>-300.4</b>	<b>-305.2</b>	<b>-294.9</b>	<b>-274.9</b>	<b>-250.9</b>	<b>-221.1</b>	<b>-179.6</b>	<b>-144.8</b>
Change against Adjustment 2020	1.7	1.6	0.9	0.9	-0.4	-5.9	-6.6	-6.2	-5.0	

The noticeable differences between the 2017 and 2018 adjustment proposals resulted from an ad-hoc revision of the *Handbook Emission Factors for Road Transport* (HBEFA, version 3.3) in the aftermath of the so-called "Diesel-gate". <sup>19)</sup>

The even bigger changes between adjustment 2019 and adjustment proposal 2020 result from an additional rather fundamental revision of the *Handbook Emission Factors for Road Transport* now available in version 4.1 <sup>20)</sup> strongly effecting the TREMOD model underlying Germany's emission reporting for road transport and hence any adjustments of NO<sub>x</sub> emissions. With such major model revision between submissions 2019 and 2020, the 2020 adjustment proposal differed significantly from the adjustment applied for and accepted in 2019.

**In comparison to 2020, the TREMOD model applied for the 2021 submission has been revised only slightly in terms of NO<sub>x</sub> emission factors, taking into account results from ongoing measurement campaigns especially for EURO 6 vehicles. Hence, the 2021 adjustment proposal differs onyl slightly from the (accepted) proposal provided with submission 2020.**

#### **Adjustment description as provided in IIRs 2014 and 2015:**

[image Description%20Adjustment%20DE-A%20-%20NOx%20from%201.A.3.b%20Road%20transport%20-%20IIRs%202014%20%26%202015.pdf](#)

<sup>1)</sup> IIASA, 1999: Amann, M.; Bertok, I.; Cofala, J.; Gyarfas, F.; Heyes, Chr.; Klimont, Zb.; Syri, S.; Schöpp, W.: Further analysis of scenario results obtained with the RAINS model - Interim Report to the Ministère de L'Aménagement du Territoire et de l'Environnement Direction de la Prévention des Pollutions et des Risques 20, avenue de Ségur75302 Paris 07 SP, April 1999 - URL: <https://iiasa.ac.at/web/home/research/researchPrograms/air/policy/france3b.pdf>

<sup>2)</sup> EB, 2012a: CLRTAP EB 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 URL: [http://www.unece.org/fileadmin/DAM/env/documents/2013/air/ECE\\_EB.AIR\\_111\\_Add.1\\_ENG\\_DECISION\\_3.pdf](http://www.unece.org/fileadmin/DAM/env/documents/2013/air/ECE_EB.AIR_111_Add.1_ENG_DECISION_3.pdf)

<sup>3)</sup> EB, 2012c: CLRTAP EB Decision 2012/12: 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 URL: [http://www.unece.org/fileadmin/DAM/env/documents/2012/EB/Decision\\_2012\\_12.pdf](http://www.unece.org/fileadmin/DAM/env/documents/2012/EB/Decision_2012_12.pdf)

<sup>4)</sup> EB, 2012b: CLRTAP EB Decision 2012/4: Provisional Application of Amendment to the Protocol to Abate Acidification, Eutrophication and Ground-level Ozone URL: [http://www.unece.org/fileadmin/DAM/env/documents/2013/air/ECE\\_EB.AIR\\_111\\_Add.1\\_ENG\\_DECISION\\_4.pdf](http://www.unece.org/fileadmin/DAM/env/documents/2013/air/ECE_EB.AIR_111_Add.1_ENG_DECISION_4.pdf)

<sup>5)</sup> ifeu, 2002: Final report to UFOPLAN study FKZ 201 45 112 (German version only): Aktualisierung des Daten- und Rechenmodells: Energieverbrauch und Schadstoffemissionen des motorisierten Verkehrs in Deutschland 1980-2020; Im Auftrag des Umweltbundesamtes; ifeu Institut für Energie- und Umweltforschung Heidelberg GmbH (Institute for Energy and Environmental Research), Wilckensstraße 3, D-69120 Heidelberg, Germany, phone: +49 (0) 6221 / 47 67 -0, fax: +49 (0) 6221 / 47 67 -19, Heidelberg, 31. Oktober 2002

<sup>6)</sup> Knörr et al. (2020a): Knörr, W., Heidt, C., Gores, S., & Bergk, F.: ifeu Institute for Energy and Environmental Research (Institut für Energie- und Umweltforschung Heidelberg gGmbH, ifeu): Fortschreibung des Daten- und Rechenmodells: Energieverbrauch und Schadstoffemissionen des motorisierten Verkehrs in Deutschland 1960-2035, sowie TREMOD, im Auftrag des Umweltbundesamtes, Heidelberg & Berlin, 2020.

<sup>7)</sup> CEIP, 2014a: Centre on Emission Inventories and Projections (CEIP): CEIP/Adjustment RR/2014/GERMANY: Review of the 2014 Adjustment Application by Germany, URL: [https://webdab01.umweltbundesamt.at/download/adjustments2014/Adjustment\\_Review\\_Report\\_GERMANY\\_2014.pdf?cgiproxy\\_skip=1](https://webdab01.umweltbundesamt.at/download/adjustments2014/Adjustment_Review_Report_GERMANY_2014.pdf?cgiproxy_skip=1), 5 August 2014.

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