

**Convention on Long-Range Transboundary Air Pollution (CLRTAP)
61th session of the Working Group on Strategies and Review
(Geneva, 4-6 September 2023)**

**Informal document by TFRN: Planned Revision of the UNECE Ammonia
Guidance Document: Questions and possible outline of contents of the
revised document**

Comments by the EU and its Member States

The EU and its Member States thank the Task Force on Reactive Nitrogen for preparing the present document.

To facilitate discussions during the 61st session of the WGSR, we provide the following advance comments and questions.

- Paragraph 2: a clarification would be needed about the meaning in 2(b) of the expression “restructure certain chapters”. Does this refer to additional information? We would appreciate, an outline of which chapters would need to be “restructured”, how and to what purpose.
- Paragraph 3: Regarding the options for revision version approaches,
 - We see no difference in content between options 1 and 2. The format for how the changes are presented to Parties and to the secretariat for editing is not of key importance. Also in the case of option 1, track changes must be transparently shown to Parties to explain what updates are proposed.
 - In option 1, where the revision proposals would be presented to Parties in a track change version on top of the current guidance: we would need to hear from the UNECE secretariat if this method would be acceptable for the UN editing and whether the limit of 10 000 words would apply only to the segments impacted by track changes (as the rest of the document has already been edited and will not need additional work).
 - In option 1, please note that the document for official adoption cannot and should not be an informal document.
 - In option 2 however, the consolidated courtesy version will be an informal document (b).
 - We would like more information to better understand whether option 3 is realistic and useful. What content would be cut away, selected by what criteria?
- Paragraph 4: it is not clear why the option 1 is considered to allow more flexibility. The format of the document is not relevant for the drafting flexibility on the content. Regardless what format is chosen to present the amendments, the Parties

will need to see what amendments are proposed (in a list of amendments or by a track changes document). “Exact tracking and reporting of version differences” will thus need to be done regardless (can be done e.g. by running a “compare versions” function at the end of the drafting process).

- Annex 1 / table of contents: it is not clear which of these chapters are to be updated or in what way. We would appreciate further clarification / explanations. The following changes compared to the current guidance document can be spotted:
 - The introduction chapter on livestock production is not included – will it be deleted?
 - N/C interactions included as explicit part of new chapter 2 on nitrogen management.
 - Former chapter VI on manure storage is proposed to be broadened and restructured into covering also manure management systems. This chapter could cover e.g. biogas installations as a new and relevant area. The new segment on additives for manure storage also seems interesting.
 - New chapter 7 on (synthetic) fertilisers is different from the current guidance chapter on fertiliser application. Will the current chapters on urea vs ammonium sulphate, etc. remain or be deleted /restructured?
 - New chapter 8 (current chapter X) on non-agricultural sources could be taken out (also with a view to the word count) and developed into a separate paper or merged with existing guidances on pollution from stationary and mobile sources. This is outside the scope of the guidance titled “ammonia from agricultural sources” and risks becoming quite long if going into e.g. the issue of ammonia as a fuel.
 - The current chapter IX on “other measures” is missing in this table of content, is it proposed to be deleted? Why?
 - Proposed new Annex C seems superfluous, this co-mitigation guidance is already under way separately and does not need to be repeated in the ammonia guidance. The separate paper can simply be referenced in the revised ammonia guidance.