

## **EURELECTRIC comments on the Fourth meeting of the Stakeholder Expert Group**

19 December 2012

1. The technical documents were produced too close to the date of the meeting to allow proper review, and for informed comments to be generated for the meeting. This reduces the usefulness for stakeholders of these meetings. For the next meeting we would appreciate if all supporting technical studies could be provided at least 2 weeks ahead of the meeting.
2. We are concerned that the Maximum Control Effects scenario includes measures which are outside the scope of the EU review of air policy to influence. For this reason, while it represents a theoretically interesting view on what might happen in the future, it should not be given equal significance to the Maximum Technically Feasible Reduction scenario in the development of air policies.
3. We have been looking in more detail at the study by IIASA on the uncertainty in transport emissions (resulting from potential real-world discrepancies or non-delivery of tighter vehicle emission standards). We note that the range of uncertainty in NO<sub>x</sub> emission from transport is as large as the range between current legislation and the maximum technically-feasible reduction for all other sectors together. For this reason it is important that transport emission reduction measures are brought within the GAINS optimisation framework, and do not continue to be treated differently from all other sectors.
4. It was stated that GAINS can now calculate mercury emissions. We would like further information on the emission factors being used for this for the power sector.