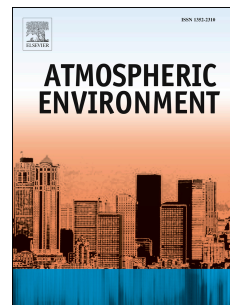


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Critical load exceedances under equitable nitrogen emission reductions in the EU28

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Abstract

The ecosystem area in the 28 states of the European Union (EU28) for which eutrophication critical loads are exceeded is investigated under the revised National Emission Ceiling Directive (NECD) and under alternative scenarios whereby reduction efforts are shared equitably among Member States. The focus is on nitrogen oxide (NO_x) and ammonia (NH₃) emission reduction policies that ensure that the total EU28 emission reduction target for 2030 under the NECD is achieved, but by equity-based emission reductions for each Member State. A gradual reduction of emissions of nitrogen in the EU28 is assessed by imposing ever lower common maximum densities for emissions (a) per unit area of a country (areal-equity) (b) per capita of a country's population (per capita-equity), and (c) per euro (€) of a country's GDP (GDP-equity). The NECD aims at a reduction of EU28 emissions of NO_x and NH₃ of 63% and 19%, respectively in 2030, compared to base year 2005. Under these reductions, about 67% of EU28 ecosystem area remains at risk of adverse effects of nitrogen deposition. We demonstrate that reducing N emissions subject to GDP-equity among EU28 Member States could have reduced that area at risk to about 61%. The application of areal and per capita-equity does not lead to significantly different ecosystem areas at risk when compared to NECD.

Keywords: Air pollution; Critical loads; EU28 Ecosystems; Eutrophication; NEC Directive; Nitrogen deposition.

1. Introduction

The search for mechanisms to share the cost of measures to abate emissions of air pollutants has a long history in the development of mitigation policies. Cap-and-trade policies were instrumental in the Acid Rain Program following the 1990 amendment to the USA Clean Air Act (see US-EPA, 1990). It allowed for the selling and trading of sulphur dioxide emission allowances of power plants nationwide, subject to a regionally set emission cap. Following its relative success, cap-and-trade policies are also being put in place in support of greenhouse gas emission mitigation, such as the European Union (EU) Emission Trading Scheme (EC, 2003). In cap-and-trade policies, emission regulation addresses the allocation of (best) available technology,

47 related emission reduction costs and emission permits. Mejean *et al.* (2015) elaborate
48 – in the context of climate change – how allocation rules can be derived from equity
49 principles pointing out that these are a matter of distributing costs (Ringius *et al.*, 2002
50 cited in Mejean *et al.*, 2015) and commonly referred to as burden sharing. An example
51 of applying equity in the early days of air pollution control was the 1985 protocol to
52 the 1979 Convention on Long-range Transboundary Air Pollution (LRTAP
53 Convention) on the reduction of sulphur emissions (UNECE, 1985) that was based on
54 the concept of a flat 30% reduction of sulphur dioxide emissions by the Parties to the
55 LRTAP Convention.

56 A common characteristic of applying burden sharing concepts, irrespective of
57 whether they address climate change or air pollution, is that the risks to environmental
58 and health impacts are not a target for, but rather a consequence of emission
59 reductions. Burden sharing turns out to imply “the right to emit” as Averchenkova *et*
60 *al.* (2014) put it with respect to the 2030 mitigation pledges for the 2015 Climate
61 Conference (UNFCCC, 2015). Therefore, the result of sharing the burden of the
62 mitigation of air pollution sources between countries is that it does not necessarily also
63 lead to sharing the impacts. Successive air pollution abatement policies under the
64 LRTAP Convention (UNECE, 1994; UNECE, 1999; UNECE, 2012) were focused on
65 setting emission ceilings taking risks for the environment and public health into
66 account (Reiss *et al.*, 2012). Burden sharing in these agreements was embodied by
67 model assessments aiming at the minimization of total European mitigation costs
68 subject to protection targets for environmental and public health.

69 Based on this concept under the LRTAP Convention, a similar approach was
70 conducted in the European Union (EC, 2001). The environmental and health targets of
71 the 2001 National Emission Ceiling Directive (NECD) referred to 6th Environmental
72 Action Programme of the EU, aiming at compliance with the critical loads for
73 acidification and eutrophication and with critical levels for ground-level ozone (see
74 Hettelingh *et al.*, 2013). However, the political agreement on emission ceilings
75 implied an unequal distribution of emission reductions and ecosystems protection over
76 EU28 Member States.

77 Finally, the latest revision of the NECD (EU, 2016) establishes for each Member
78 State emission reduction requirements for five air pollutants (SO₂, NO_x, VOC, NH₃
79 and PM_{2.5}) for 2030 relative to the base year 2005, with the aim to reduce harmful
80 impacts of air pollution on human health and vegetation. ”Member States should

81 implement this Directive in a way that contributes effectively to achieving the Union's
82 long-term objective on air quality, as supported by the guidelines of the World Health
83 Organisation, and the Union's biodiversity and ecosystem protection objectives by
84 reducing the levels and deposition of acidifying, eutrophying and ozone air pollution
85 below critical loads and levels as set out by the LRTAP Convention” (EU, 2016, pp.
86 L344-2, para. 8). This reference is interesting because critical load exceedances within
87 a country are caused by both national as well as transboundary emission sources. As a
88 consequence, the answer to questions addressing equity of burden sharing becomes
89 particularly complex.

90 With the focus on eutrophication, we investigate in this paper the effect on the
91 protection of EU28 ecosystems by applying (ever stricter) equity of NO_x and NH_3
92 emissions in Member States. This affects the distribution of emissions reductions of
93 these pollutants, leading to (ever lower) ecosystem areas in the EU28 for which
94 eutrophication critical loads (CLeutN) are exceeded. We also compare these emission
95 reductions to those under the NEC Directive. In particular, the paper examines equity
96 of emissions (a) per unit area of a country, (b) per capita of a country's population, and
97 (c) per € of a country's GDP. We also compare the resulting areas at risk against those
98 resulting from the NEC Directive, and conclude with an assessment of the efficiency
99 of applying equity principles in terms of the risk of eutrophication in the EU28
100 Member States.

101

102 **2. Method for assessing exceedances under equitable emissions**

103

104 Here we describe the emissions of NO_x and NH_3 (section 2.1), their atmospheric
105 dispersion (section 2.2), critical loads for eutrophication and their exceedances
106 (section 2.3) and, finally, the application of NO_x and NH_3 emission densities to
107 establish alternative risks of eutrophication compared to those under the NECD
108 (section 2.4).

109

110 ***2.1. Emission and density data***

111

112 Emission data for NO_x and NH_3 of EU28 Member States for 2005 and their NECD
113 projections for 2030 are obtained from Amann et al. (2018) as a basis to compute
114 emission densities whereby emissions for each EU28 Member State are normalized

115 using its geographical area, population and gross domestic product (GDP). More
 116 specifically, emission densities (a) per unit area of a country (areal-equity), (b) per
 117 capita of a country's population (per capita-equity), and (c) per € of a country's GDP
 118 (GDP-equity) are based on capita and GDP data for the NECD base year 2005 (EU,
 119 2016b, Annex 1), while the areas of Member States have been obtained from the
 120 Fischer Weltalmanach (2018). Emission densities for 2005 are summarized here
 121 (Table 1), whereas isolines of total nitrogen emissions as function of these densities
 122 can be found in the Supplementary Material (Figure S1).

123

124 **Table I:** Areal (in tN/km²), per capita (in kgN/cap) and per GDP-€ (in gN/€) emission
 125 densities for NO_x-N and NH₃-N emissions in 2005 in the EU28 countries.

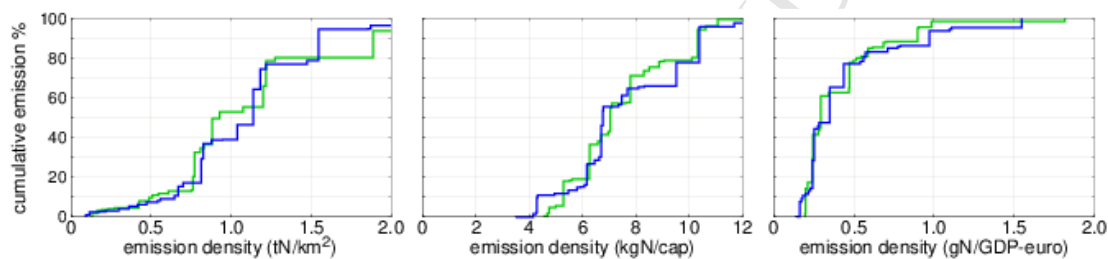
	tN/km ²		kgN/cap		gN/€	
	NO _x -N	NH ₃ -N	NO _x -N	NH ₃ -N	NO _x -N	NH ₃ -N
Austria	0.83	0.65	8.5	6.63	0.28	0.22
Belgium	3.03	1.87	8.87	5.47	0.29	0.18
Bulgaria	0.49	0.3	6.97	4.26	1.82	1.11
Croatia	0.43	0.56	5.61	7.35	0.59	0.77
Cyprus	1.22	0.95	8.95	6.95	0.45	0.35
Czech Republic	1.07	0.88	8.3	6.78	0.68	0.56
Denmark	1.27	1.47	10.1	11.69	0.24	0.28
Estonia	0.27	0.18	9.07	5.92	0.9	0.59
Finland	0.16	0.09	10.63	6.07	0.34	0.2
France	0.77	1.14	7.04	10.38	0.24	0.35
Germany	1.22	1.55	5.28	6.7	0.2	0.25
Greece	0.93	0.36	11.08	4.32	0.59	0.23
Hungary	0.51	0.7	4.69	6.46	0.52	0.71
Ireland	0.61	1.22	10.32	20.69	0.29	0.57
Italy	1.2	1.18	6.27	6.17	0.24	0.24
Latvia	0.19	0.22	5.52	6.19	0.7	0.79
Lithuania	0.23	0.42	4.57	8.11	0.62	1.1
Luxembourg	6.59	1.86	36.95	10.4	0.5	0.14
Malta	8.53	4.46	6.7	3.5	0.5	0.26
Netherlands	2.63	3.02	6.7	7.68	0.21	0.24
Poland	0.76	0.83	6.25	6.77	0.9	0.97
Portugal	0.81	0.47	7.11	4.15	0.47	0.27
Romania	0.43	0.67	4.74	7.47	0.98	1.55
Slovakia	0.55	0.54	5	4.96	0.54	0.54
Slovenia	0.75	0.82	7.62	8.32	0.5	0.54
Spain	0.88	0.81	10.32	9.51	0.47	0.44
Sweden	0.13	0.12	6.59	5.8	0.19	0.17
United Kingdom	1.89	1.04	7.79	4.29	0.29	0.16
EU28	0.79	0.79	7.07	7.08	0.31	0.31

126

127 Countries that have already applied stringent emission reductions before the base
 128 year 2005 can be expected to have relatively low emission densities in 2005 depending
 129 on the size of the area, population or GDP. Minimum areal, per capita and GDP

130 equities for NO_x emissions in 2005 are obtained in Sweden (0.13 tN/km²), Lithuania
 131 (4.57 kgN/cap) and Sweden (0.19 gN/€) (see Table 1) respectively. Maximum values
 132 for these three densities are computed for Malta (8.53 tN/km²), Luxemburg (36.95
 133 kgN/cap) and Bulgaria (1.82 gN/€), respectively. For NH₃, minimum densities are
 134 computed for Finland (0.09 tN/km²), Malta (3.50 kgN/cap) and United Kingdom (0.16
 135 gN/€), respectively, and maximum NH₃ emission densities are obtained for Malta
 136 (4.46 tN/km²), Ireland (20.69 kgN/cap) and Romania (1.55 gN/€). Weighing these
 137 emission densities with their corresponding 2005 country emissions and scaling to
 138 100% gives the cumulative distribution functions (CDFs) shown in Figure 1. The
 139 CDFs of the three densities illustrate that the median for each of the NO_x emission
 140 densities are 0.93 tN/km², 7.04 kgN/cap and 0.29 gN/€, and for NH₃ 1.14 tN/km², 6.77
 141 kgN/cap and 0.35 gN/€, respectively.

142



143

144 **Fig. 1.** Cumulative distributions of EU28 countries' 2005 emission densities per area (left), per
 145 capita (centre), and per GDP-€ (right) weighed by their respective 2005 emission (see Table I;
 146 green=NO_x-N, blue=NH₃-N; 100%=total EU28 2005 emissions).

147

148 2.2 Dispersion modelling

149

150 The Meteorological Synthesizing Centre West (MSC-W) of the Co-operative
 151 programme for monitoring and evaluation of the long-range transmission of air
 152 pollutants in Europe (EMEP) models, *inter alia*, the depositions of NO_x and NH₃ on a
 153 0.50°×0.25° longitude-latitude grid from European national emissions (Simpson et al.,
 154 2012). Note that also sulphur emissions are needed to compute nitrogen deposition due
 155 to their chemical interactions. In this paper, we assume sulphur emissions for all
 156 Member States equal to those agreed under NECD-2030. EMEP also derives so-called
 157 source-receptor matrices (SRMs) by conducting a series of model runs for five
 158 'typical' meteorological years and three aggregated land use classes (forests, semi-
 159 natural vegetation and open land/surface waters). The derived SRMs can then be used
 160 to quickly compute depositions for any given set of emissions by matrix

161 multiplications (Amann et al., 2011). In this paper the SRMs generated in 2012 are
162 used to compute depositions from any set of NO_x and NH_3 country emissions for
163 assessing areas where eutrophication critical loads are exceeded.

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166 ***2.3 Critical loads for eutrophication and exceedances***

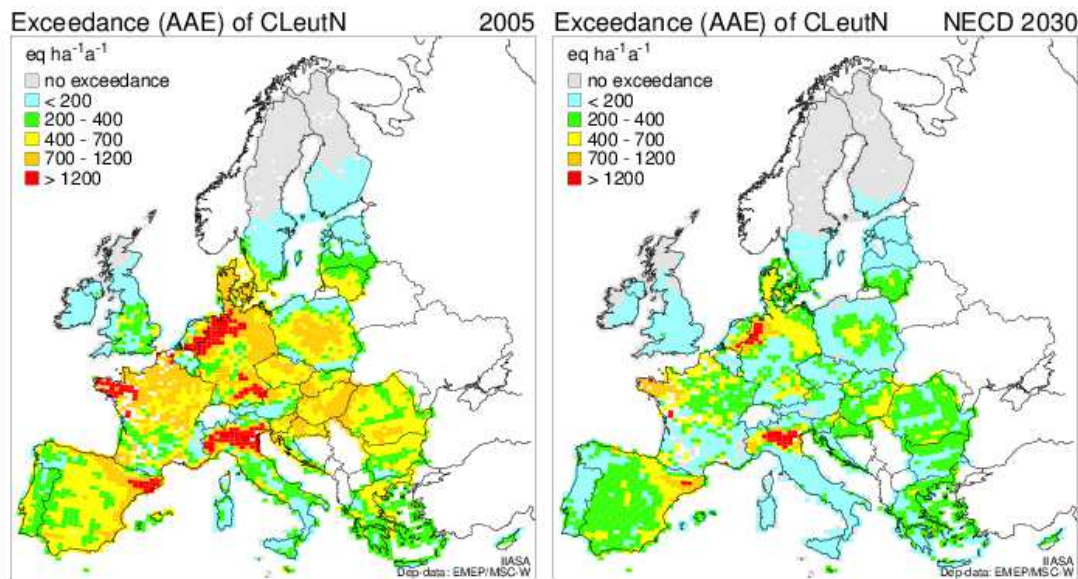
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168 The concept of a critical load is defined as “a quantitative estimate of an exposure
169 to one or more pollutants below which significant harmful effects on specified
170 sensitive elements of the environment do not occur according to present knowledge”
171 (Nilsson and Grennfelt, 1988). Details on the critical load concept and its applications
172 can be found in De Vries et al. (2015). The concept has been applied to support effect-
173 based European air pollution abatement agreements (see, e.g., Hettelingh et al., 2013;
174 2015; Reiss et al., 2012). The most recent estimates of critical loads (see Hettelingh et
175 al., 2017) for eutrophication were used for the assessment described in this paper.

176 These include data from twelve EU28 Member States for different European
177 ecosystems (Table S1). Critical loads for the remaining Member States were taken
178 from the so-called European background database, held at the Coordination Centre for
179 Effects under the LRTAP Convention (see Posch and Reinds, 2017).

180 Exceedances of critical loads are calculated for deposition patterns that result from
181 the emissions in 2005 and 2030, the target year of the 2016 NECD (EU, 2016). The
182 exceedance in each deposition grid cell is computed as the so-called Average
183 Accumulated Exceedances (AAE: see Posch et al., 2001; 2015) in each grid cell,
184 computed as the ecosystem area-weighted sum of the differences, in each grid cell,
185 between ecosystem-specific nitrogen deposition and critical load for eutrophication,
186 expressed in equivalents, or moles of charge, per area and year (note that in the case of
187 nitrate and ammonium, equivalents are the same as moles, and that, e.g., kg of N can
188 be obtained by multiplying with 0.014). The AAE can also be computed for any
189 geographical area, e.g., the Member States individually and for the EU28 as a whole;
190 and results for 2005 and 2030 are given in Table 2. Figure 2 shows the gridded AAE
191 for eutrophication in Europe in 2005 and 2030.

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Fig. 2. Average Accumulated Exceedances (AAE) of the critical loads for eutrophication in the EU28 countries in 2005 (left) and under the NECD 2030 emissions (EU, 2016) (right).

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The computed area at risk of eutrophication, i.e. where the AAE exceeds zero, both in 2005 and 2030 turns out to cover large shares of the EU28 ecosystem area (all non-grey areas in Figure 2). High AAE, i.e. higher than $700 \text{ eq ha}^{-1} \text{ a}^{-1}$, in 2005 (orange and red shadings in Figure 2, left) occur in the border area of the Netherlands, Germany and Belgium and in France, Spain, southern Germany and northern Italy. In 2030, the magnitude and coverage of the area at risk is reduced (Figure 2, right) compared to 2005, but eutrophication continues to be a risk in the whole of the EU28 including areas with very high critical load exceedances on the border between the Netherlands and Germany and the north of Italy in particular.

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The three highest national AAEs in 2005 (Table 2) are in The Netherlands ($958 \text{ eq ha}^{-1} \text{ a}^{-1}$), Luxemburg ($887 \text{ eq ha}^{-1} \text{ a}^{-1}$), and Germany ($769 \text{ eq ha}^{-1} \text{ a}^{-1}$), which values are relatively high compared to $413 \text{ eq ha}^{-1} \text{ a}^{-1}$, the average for the EU28. The area at risk of eutrophication in 2005 is computed to cover 81% in the ecosystem area of the EU28. Under NECD emissions for 2030 (NECD-2030), that percentage is reduced to 67 %, implying that, compared to 2005, an additional 14 % of the EU ecosystem area is protected under NECD-2030.

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218 **Table 2:** Ecosystem area (in 1000 km²) at risk (%) in the EU28 in 2005 and 2030 under
 219 NECD, i.e. ecosystem area where the critical loads for eutrophication (CLEutN) have a
 220 positive exceedance (computed as AAE in eq ha⁻¹a⁻¹)

Country	Ecosystem area		Risk of eutrophication in:		
			2005		NECD-2030
	1000 km ²	%	AAE	%	AAE
Austria	51	75	285	32	61
Belgium	6	11	22	1	2
Bulgaria	51	100	355	93	166
Croatia	34	97	528	83	233
Cyprus	2	100	280	100	228
Czech Republic	6	100	648	96	162
Denmark	6	100	761	99	388
Estonia	27	83	112	30	17
Finland	41	10	5	1	0
France	177	89	493	73	201
Germany	107	82	769	65	319
Greece	67	100	339	95	207
Hungary	28	100	653	79	289
Ireland	18	8	12	3	3
Italy	106	77	391	42	147
Latvia	37	97	243	84	102
Lithuania	22	100	428	97	241
Luxembourg	1	100	887	100	442
Malta	<1	100	436	99	270
Netherlands	5	76	958	69	442
Poland	97	77	401	51	121
Portugal	35	100	329	99	147
Romania	105	100	488	93	248
Slovakia	24	100	549	89	231
Slovenia	13	100	663	87	270
Spain	231	100	520	97	317
Sweden	59	14	29	11	9
United Kingdom	73	22	59	6	7
EU28	1,431	81	413	67	188

221

222 *2.4 Modelling areas at risk under equal emission densities*

223

224 The ecosystem area in the EU28 for which eutrophication critical loads are
 225 exceeded is investigated under simulated emission reductions that gradually reduce
 226 emissions of NO_x and NH₃ in the EU28 by imposing ever lower common (i.e. EU28-
 227 wide) maxima for areal, per capita and GDP densities, starting from 2005 emissions.

228 We assume that a country is not allowed to increase its emissions compared to the
 229 2005 level, i.e. in this procedure, the emission density of a country is only reduced
 230 when the value is lower than the 2005 density shown in Table 1. This implies that in

231 no Member State emissions in 2030 can be higher than those in 2005 (Table S2),
 232 irrespective of whether emission reductions are established under NECD-2030, areal-,
 233 per capita or GDP-equity. However, compared to emission reductions committed
 234 under NECD-2030, a rich country can have higher emissions under GDP-equity in
 235 2030 than relatively poor countries, while a country with a small area may have to
 236 reduce more under areal-equity.

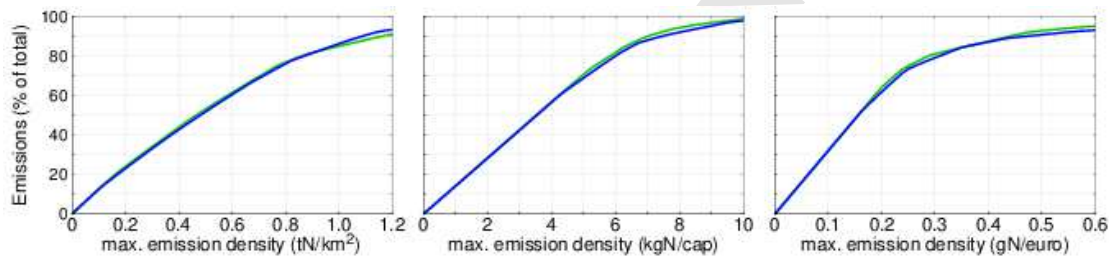
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238 3. Results

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240 EU28 emissions are shown in Figure 3 as function of the respective maximal
 241 emission density, i.e. as function of $\sum_k \min\{x, x_{2005,k}\}$, where x is the prescribed
 242 maximum emission density and $x_{2005,k}$ the 2005 emission density of country k
 243 (100%=total EU28 2005 emissions).

244



245

246 **Fig. 3.** EU28 2005 emissions as function of the maximal areal (left), per capita (centre), and
 247 per GDP-€ (right) emission density (100%=total EU28 2005 emissions; green=NO_x-N,
 248 blue=NH₃-N).

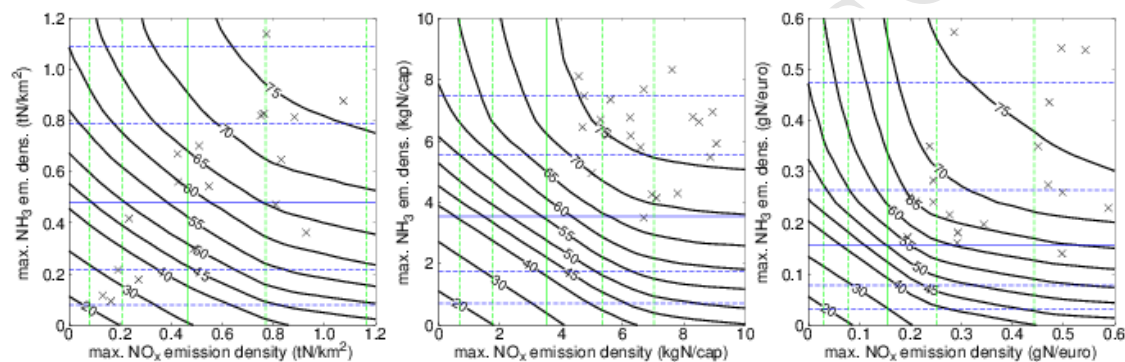
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250 Figure 3 illustrates that the percentage share in EU28 totals of NO_x and NH₃
 251 emissions, is similar for each of the three equities. For example, 50% of the NO_x
 252 emissions (i.e. an equitable reduction in EU28 Member States of 2005 NO_x emissions
 253 by 50%) can be obtained by applying a maximum emission density of approximately
 254 0.47 tN/km², 3.54 kgN/cap or 0.16 gN/€. Very similar maximum emission densities
 255 also hold when applied to obtain 50% of 2005 EU28 NH₃ emissions. However, if the
 256 lowest NO_x emission densities (see section 2.1 and Table 1) were applied to all EU28
 257 countries, Figure 3 reveals that about 16% (at 0.13 tN/km², in Sweden), 65% (at 4.57
 258 kgN/cap, in Lithuania) and 61% (at 0.19 gN/€, in Sweden) can be obtained by
 259 applying the three equities, respectively, on total 2005 NO_x emissions of the EU28;
 260 implying respective reductions of 2005 NO_x emissions by about 84%, 35% and 39%.
 261 Similarly, applying the lowest NH₃ emission densities would lead to approximately

262 89%, 51% and 55% ammonia emission reductions in the EU28, respectively. These
 263 reductions, in turn, lead to a decreasing area at risk of eutrophication and lower AAEs
 264 compared to area at risk and AAE for 2005. This is illustrated in Figures 4 and 5
 265 showing isolines of the percentage of the ecosystem area for which the critical loads
 266 for eutrophication are exceeded within the EU28 Member States as function of
 267 applying to all Member States maximum emission densities (Figure 4) and of
 268 percentage emission reductions induced by maximum emission densities (Figure 5).

269 Also shown in Figure 4 as horizontal (blue lines) and vertical lines (green lines) are
 270 the maximum emission densities for an equitable 10, 25, 50, 75 and 90 % overall
 271 emission reduction in NO_x and NH_3 , respectively.

272



273

274 **Fig. 4.** Isolines of EU28 ecosystem area exceedance percentages of eutrophication critical
 275 loads, CL_{eutN} , as a function of the maximum areal (left), the maximum per capita (centre),
 276 and the maximum per GDP-€ (right) emission densities of NO_x and NH_3 . The vertical green
 277 and horizontal blue lines show the maximum emission densities for an equitable 10, 25, 50
 278 (solid line), 75 and 90 % overall emission reduction in the EU28 for NO_x (right-to-left) and
 279 NH_3 (top-to-bottom), resp. The crosses show the densities of the EU28 countries (those within
 280 the frame of the plot; see Table I).

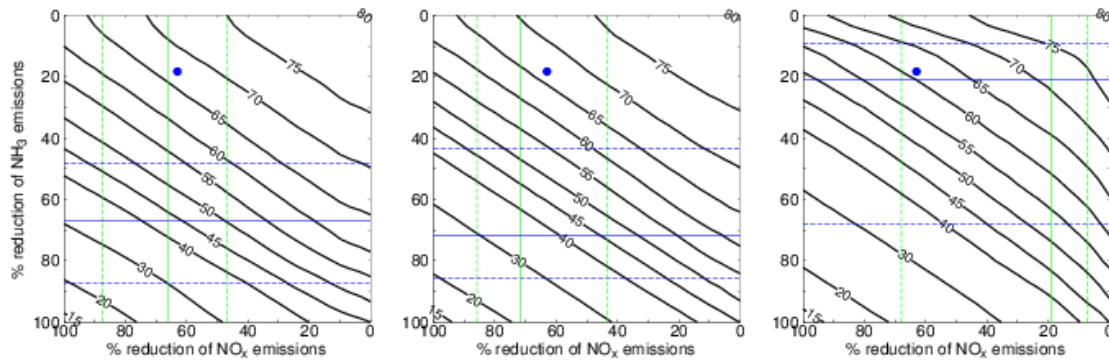
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282 As can be seen from Figure 4 that by reducing both NO_x and NH_3 2005 emissions
 283 in 2030 equitably by 50% (solid blue and green line, respectively) leaves about 57% of
 284 the ecosystem area unprotected when areal (Figure 4, left) is pursued, 55% for per
 285 capita-equity (Figure 4, centre), and about 50% of the area remain unprotected for per
 286 GDP-equity (Figure 4, right).

287 The axes of Figure 4 and Figure 5 are non-linearly connected via the graphs in
 288 Figure 3. Hence Figure 5 shows eco-risk isolines that are derived from the application
 289 of maximum emission densities to emissions of NO_x and NH_3 for each EU28 Member
 290 State to achieve the percent emission reduction (assuming NECD-2030 emissions for
 291 sulphur in all countries). The blue dots in Figure 5 show the percentage area exceeded
 292 if total emission reductions (compared to 2005) for the EU28 under NECD-2030 were

293 achieved by respective equitable maximum emission densities in the EU Member
 294 States. Emissions of each Member State in 2005 and in 2030 under NECD and the
 295 application of maximum emission densities to achieve the same overall reductions are
 296 given in Table S2.

297



298

299 **Fig. 5.** Isolines of European ecosystem area exceedance percentages of eutrophication critical
 300 loads, CLeutN, as a function of the European total emission reductions of NO_x and NH₃
 301 induced by maximum areal (left), maximum per capita (centre), and maximum per GDP-€
 302 (right) emission densities. The vertical green and horizontal blue lines show the emission
 303 reductions corresponding to (maximum) densities of 0.1, 0.3 (solid line) and 0.5 tN/km² (left),
 304 1, 2 (solid line) and 4 kgN/cap (centre), and 0.1, 0.3 (solid line) and 0.5 gN/€ (right). For the
 305 blue dots, see text.

306

307 However, Figures 4 and 5 underpin that the area at risk of CLeutN exceedance can
 308 be reduced to, or below, the percentage area exceeded under NECD-2030, i.e. 67%
 309 (Table 2). This is achieved by applying maximum emission densities without violating
 310 the NECD-2030 emission reduction objectives for NO_x and NH₃ of 63% and 19%
 311 respectively, shown in Figure 5 by blue dots. This is the case in particular with the
 312 application of GDP-equity leading to a smaller area at risk, i.e. 61% (Table 3) for the
 313 EU28 and also to a lower AAE, i.e. 181 eq ha⁻¹a⁻¹ as compared to 188 eq ha⁻¹a⁻¹ (Table
 314 2). Table 3 also shows that the ecosystem area at risk under areal- and per capita
 315 equity is not different from that under NECD-2030, i.e. 67%. However, the AAE
 316 under areal-equity is higher (201 eq ha⁻¹a⁻¹) and equal under per-capita equity (188 eq
 317 ha⁻¹a⁻¹).

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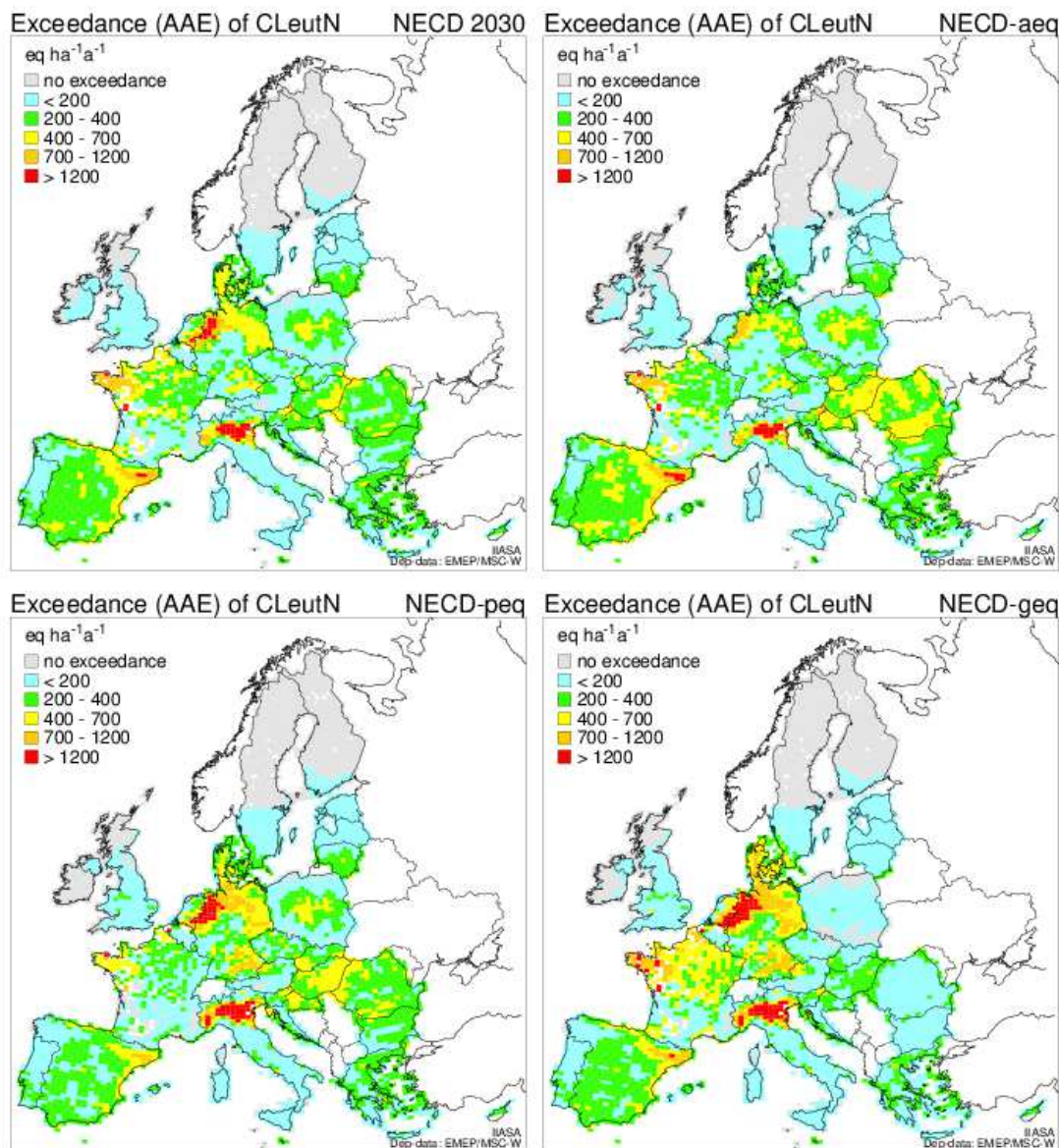
323 **Table 3:** Ecosystem area at risk (%) and AAE (eq ha⁻¹ a⁻¹) in 2030 caused by EU28 Member
 324 State reductions of NO_x-N and NH₃-N emissions derived from applying areal, per capita and
 325 GDP-equity such that the overall reduction of NO_x and NH₃ emissions meet the objective
 326 under NECD, i.e. 63% and 19%, respectively.

EU Member State	Eco area	Exceedance in 2030 under					
		areal-equity		per capita- equity		GDP-equity	
		1000 km ²	% area	AAE	% area	AAE	% area
Austria	51	36	66	40	94	42	107
Belgium	6	0	0	1	2	3	5
Bulgaria	51	98	218	94	181	54	65
Croatia	34	85	290	85	278	81	184
Cyprus	2	100	235	100	229	100	228
Czech Republic	6	95	194	100	260	79	149
Denmark	6	98	297	99	339	100	546
Estonia	27	39	21	30	16	11	10
Finland	41	1	1	1	0	1	0
France	177	70	173	58	112	79	262
Germany	107	58	221	70	439	74	516
Greece	67	97	219	95	201	92	177
Hungary	28	95	399	94	381	70	207
Ireland	18	1	1	0	0	0	0
Italy	106	37	120	51	208	54	221
Latvia	37	87	112	83	102	50	52
Lithuania	22	97	267	96	231	82	111
Luxembourg	1	98	260	100	380	100	594
Malta	<1	97	240	100	298	100	300
Netherlands	5	27	45	70	509	74	749
Poland	97	52	138	54	142	23	22
Portugal	35	100	185	98	144	99	141
Romania	105	98	360	95	292	52	87
Slovakia	24	93	302	92	298	81	138
Slovenia	13	93	322	95	301	83	244
Spain	231	98	369	95	232	96	269
Sweden	59	12	9	12	11	12	13
United Kingdom	73	5	6	10	14	13	20
EU28	1,431	67	201	67	188	61	181

327

328 The geographical pattern of exceedances (AAE) over the EU28 Member States is
 329 shown in Figure 6.

330



331
 332 **Fig. 6.** Exceedance (AAE) of eutrophication critical loads for depositions due to NECD-2030
 333 emissions (top left); and the AAE for depositions due to the same EU28 total emissions based
 334 on maximum emission densities of NO_x and NH_3 on a per area (top right), per capita (bottom
 335 left) and per GDP-€ (bottom right) basis.
 336

337 The application of GDP-equity results in exceedances (Figure 6, bottom right) in,
 338 e.g., the Baltic states, Poland, Romania and Bulgaria that are lower than $200 \text{ eq ha}^{-1} \text{ a}^{-1}$
 339 (blue shading), i.e. markedly lower than under NECD-2030 (Figure 6, top left), where
 340 maximum exceedances in these countries range between $400\text{-}700 \text{ eq ha}^{-1} \text{ a}^{-1}$ (yellow
 341 shading). From Table S2 it can be seen that NO_2 and NH_3 emissions for these
 342 countries is markedly lower under GDP-equity than their commitments under NECD-
 343 2030. The fact that these countries would have to reduce their emissions more than
 344 under NECD-2030 is because their GDP is relatively low within the EU28. However,

345 other countries have higher exceedances under GDP-equity than under NECD-2030.
346 This is especially apparent in Germany and the Netherlands, where larger areas have
347 exceedances higher than $1200 \text{ eq ha}^{-1}\text{a}^{-1}$ under GDP-equity than under NECD-2030.
348 Indeed, when inspecting the AAE for the entire country, under NECD-2030 the AAE
349 in the Netherlands and in Germany is 442 and $319 \text{ eq ha}^{-1}\text{a}^{-1}$,
350 respectively (Table 2), while under GDP-equity the AAEs are 749 and $516 \text{ eq ha}^{-1}\text{a}^{-1}$,
351 respectively (Table 3). This is (largely) a consequence that the emissions of the
352 Netherlands and Germany are higher under GDP-equity than under NECD-2030
353 (Table S2).

354 The pattern of exceedances under per capita-equity is broadly similar to that under
355 NECD-2030. However, under areal-equity the exceedance in the Netherlands is
356 significantly reduced to a level of about $45 \text{ eq ha}^{-1}\text{a}^{-1}$ (Table 3) compared to $442 \text{ eq ha}^{-1}\text{a}^{-1}$
357 (Table 2) under NECD-2030. To reach this ecosystem protection under areal-
358 equity the Dutch would have to reduce emissions of NO_x and NH_3 more than under
359 NECD-2030, i.e. from 140 kt and 120 kt, respectively, to 45 and 46 kt (Table S2). The
360 reason is that areal emission densities are relatively high for countries with small
361 geographical coverage, such as the Netherlands. In general, it should be noted that
362 imposing ever lower common maximum densities for areal-, per capita- and GDP-
363 equities to 2005 emissions, imply that quite stringent emission reductions are
364 computed for Member States with high emission densities.

365 Finally, it can be noted from comparing the area at risk between Table 3 and Table
366 2 that emission reductions under the application of per capita-equity leads to less area
367 at risk than under NECD-2030 in France (58% versus 73%), Ireland (0% versus 3%),
368 Latvia (83% versus 84%) and Spain (95% versus 97%). A spatial view of the
369 distribution of areas at risk of exceedances of CLEutN , as percentage of the total
370 ecosystem area in each grid cell, is provided in Figure S2. The increased protection of
371 ecosystem area shown in Figure 6 is confirmed in Figure S2. The grid cells in the
372 Baltic states, Poland, Romania and Bulgaria with more than 99% areal exceedance
373 under NECD-2030 (Figure S2, top left) are reduced to less than 80% of the ecosystem
374 area at risk under emission reductions following GDP-equity (Figure S2, bottom
375 right).

376

377

378

379 4. Summary and concluding remarks

380

381 Burden sharing concepts tend to address risks for environmental and health impacts
382 implicitly, i.e. as a consequence of, rather than a target for, emission reductions,
383 irrespective of the environmental issue at stake. In this paper the risk of impacts of
384 excessive nitrogen deposition in 2030 to the ecosystems in the EU28 is investigated
385 for the 2016 National Emission Ceiling Directive, and three alternative emission
386 reduction schemes. These alternatives are established by imposing ever lower
387 maximum densities for emissions of NO_x and NH_3 on the basis of areal-equity, per
388 capita-equity and GDP-equity. These equity-based emission reductions are formulated
389 such that the reduction of total NO_x and NH_3 of the EU28 for 2030 does not violate the
390 objectives set under NECD-2030, i.e. a 63% and 19% reduction, respectively.

391 The emission reduction objectives under NECD-2030 lead to 67% of the European
392 ecosystem area having an exceedance of eutrophication critical loads. In this paper it is
393 demonstrated that the EU28 ecosystem area at risk can be reduced to 61% when
394 applying GDP-equity. The distribution over the EU28 of areas where critical loads are
395 exceeded also changes compared to NECD-2030, leading to less areas at risk and
396 lower exceedances in Member States including the Baltic States, Poland, Romania and
397 Bulgaria. An increased coverage of areas at risk and higher exceedances are identified
398 under GDP-equity in Member States such as the Netherlands and Germany. The
399 application of areal and per-capita equity does lead to a change of the EU28 area at
400 risk compared to NECD-2030.

401 It turns out that 10, 4 and 14 Member States have a diminished percentage of the
402 area at risk under areal-, per capita- and GDP equity, respectively, when compared to
403 the ecosystem protection in these countries under NECD-2030. The Member States
404 with the highest benefits under each of the three equities in terms of an increased
405 percentage ecosystem protection compared to NECD-2030 are the Netherlands (42%),
406 France (14%) and Romania (41%), respectively. Similarly, the countries with the
407 highest percentage loss of ecosystem protection are Hungary, both under areal (-16%),
408 and per capita (-14%) equity, and Italy under GDP equity (-12%). It turns out that
409 decreased areas at risk in Member States come with higher emission reduction
410 requirements compared to NECD-2030, while the opposite holds for Member States
411 with an increased percentage of area at risk. For Europe as a whole, the restriction is

412 met that emission reductions under the equity approach is equal to that agreed under
413 NECD 2030.

414 In this paper the benefit of applying GDP-equity to emission reductions set under
415 NECD-2030 for the EU28, is clearly established in terms of the protection of
416 ecosystems against eutrophication critical load exceedances in most Member States
417 and in the EU28 as a whole, both in terms of area protection as well as AAE
418 magnitude. However, it is noted that the magnitude and distribution over Member
419 States of the emission reductions agreed under NECD 2030, and computed under our
420 equity approach, are not sufficient to protect all European ecosystems from nitrogen
421 deposition. It would be challenging to explore whether human health impacts, that
422 constituted an important target of emission reductions under the NEC Directive, can
423 be included in equity-oriented assessments presented in this paper. For this, more work
424 is needed to establish the distribution of the costs of emission reductions over Member
425 States to complete the knowledge on impacts of burden sharing as addressed in this
426 paper.

427

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436

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527

Critical load exceedances under equitable nitrogen emission reductions in the EU28

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Highlights:

- 67% of EU28 ecosystems risk impacts of N emissions under the 2016 NEC Directive.
- Imposing common N emissions/GDP€ reduce impacts to 61% of EU28 ecosystems.
- Under this GDP-equity CL exceedances diminish particularly in the east of the EU28.
- Imposing common N-emission/area or /capita densities has similar impacts as NEC.

Declaration of interests

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