

# Survey on e-reporting among FAIRMODE NCPs

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## Survey on e-reporting: Questions

If you (as Member State) are currently **NOT including modelled data in your official reporting**, please indicate your agreement/non-agreement with the following proposed reasons.

If you (as Member State) are currently including (or plan to do) modelled data in your official reporting, please indicate **which of the following factors is more problematic** at the moment:

- 1 Lack of technical capacity
- 2 Insufficient reliability of models
- 3 Too expensive and/or time consuming
- 4 Brings too little added value
- 5 Lack of clear and common guidelines
- 6 Limitations of administrative kind
- 7 Lack of clarity in legislation

Multiple choice answers: ranging from 1 to 5 corresponding to: **strong agreement** - **strong disagreement** and facultative comments

15 Member States delivered their answers (PO, NL, PT, CZ, FI, GR, HU, LI, UK, HR, AT, SE, BE, IE, FR)

## Lack of technical capacity (average score: 3)

The technical **capabilities vary among MS** and within MS between the national and the subnational level.

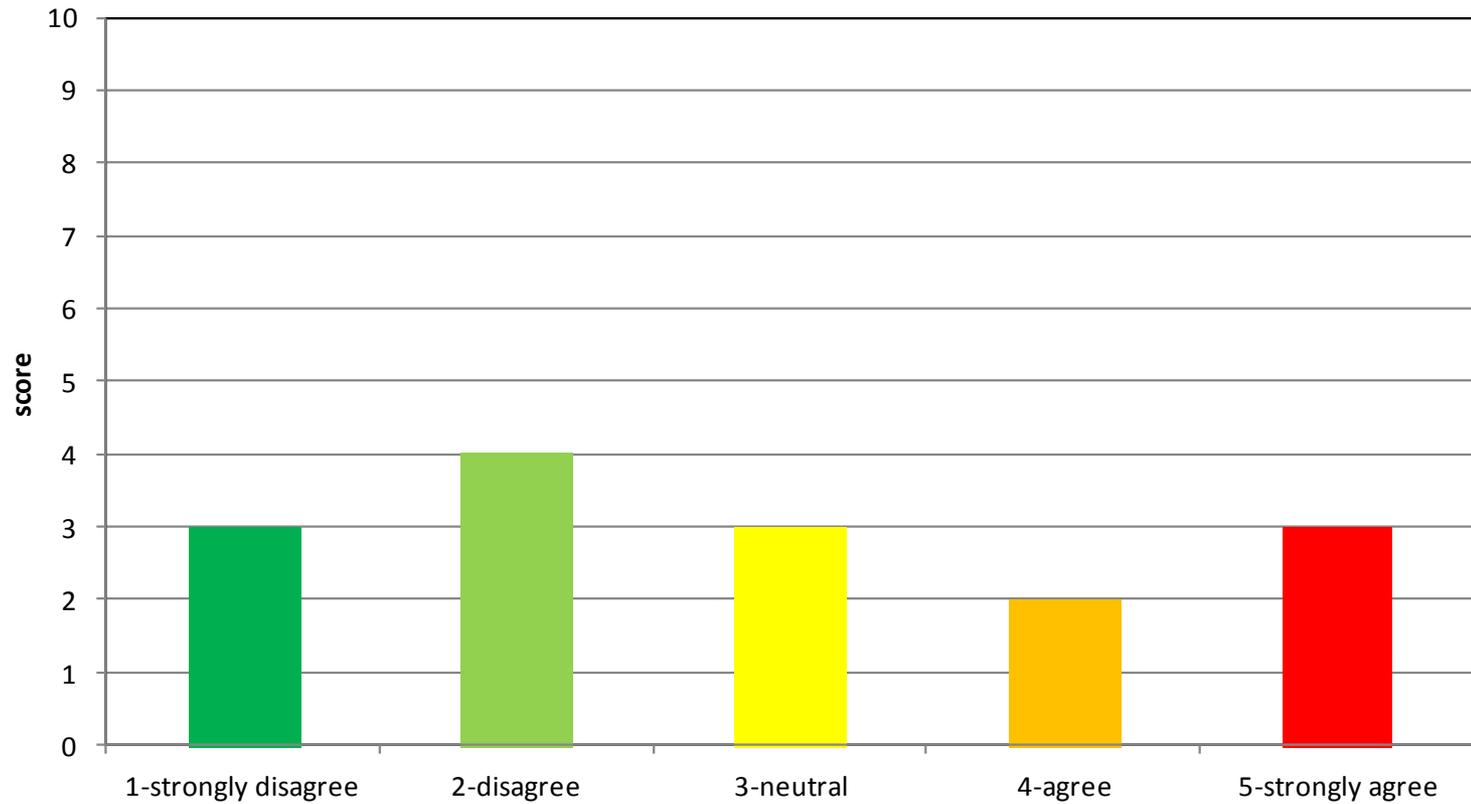
A number of countries declare to have good modelling capacities, at least at the national level (e.g. BE, NL, FR). **Some countries have highly skilled personnel** in the national bodies but the regional/local authorities do not have specialised staff (e.g. AT, SE).

In other cases, the national authorities do not have modeling skills and have to rely on **external services** (e.g. PO, PT, GR) or have skills but do not have enough personnel (e.g. HR).

In one case, the current implementation of the IPR is considered to **go further than the INSPIRE directive** and would like AQUI to report also modeling information.

1

## Lack of technical capacity



## Insufficient reliability of models (average score: 2.5)

The perception about the reliability of models is quite different among the MS. Many NCPs consider this aspect is **not preventing their country to report modeled data** while others quite agree this is a limiting factor.

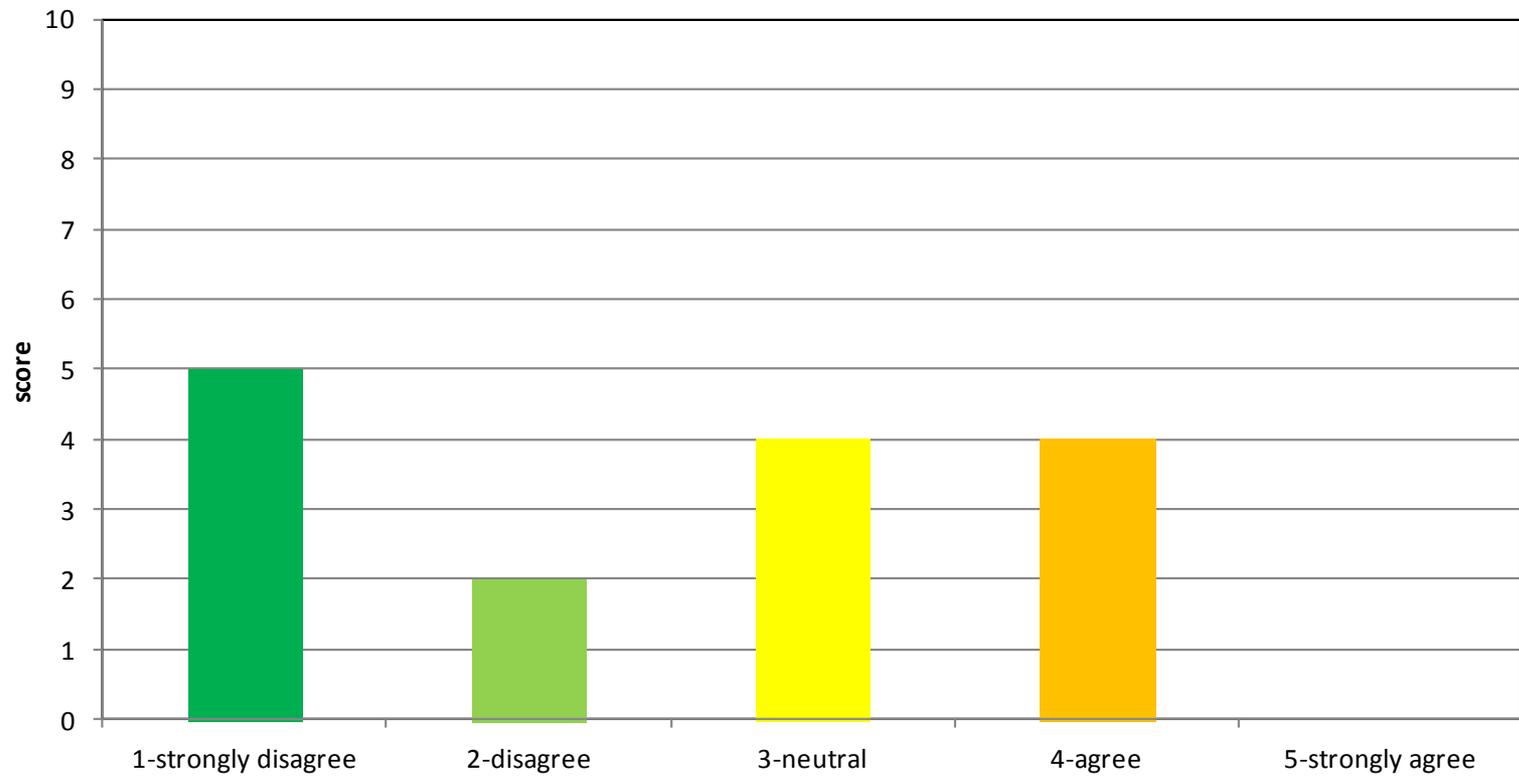
According to the experts some **reliable modelling techniques are available** while others still need further development.

The main motivations for skepticism about models are:

- risk that models to deliver **false alerts** or false exceedances,
- models **do not cover all regulated pollutants** with the same degree of confidence (e.g. big uncertainties for metals and organic compounds),
- model output influenced by the poor quality of **emission inventories**,
- difficulties to model short-term time windows (e.g. daily averages),
- **QA/QC procedures** not yet standardised and therefore difficult to judge the reliability of the model output.

2

## Insufficient reliability of models



## Too expensive and/or time consuming (average score: 3.0)

The views of the **NCPs diverge** also about this topic.

For many countries the need of resources either in terms of staff, time and/or funds is quite stringent.

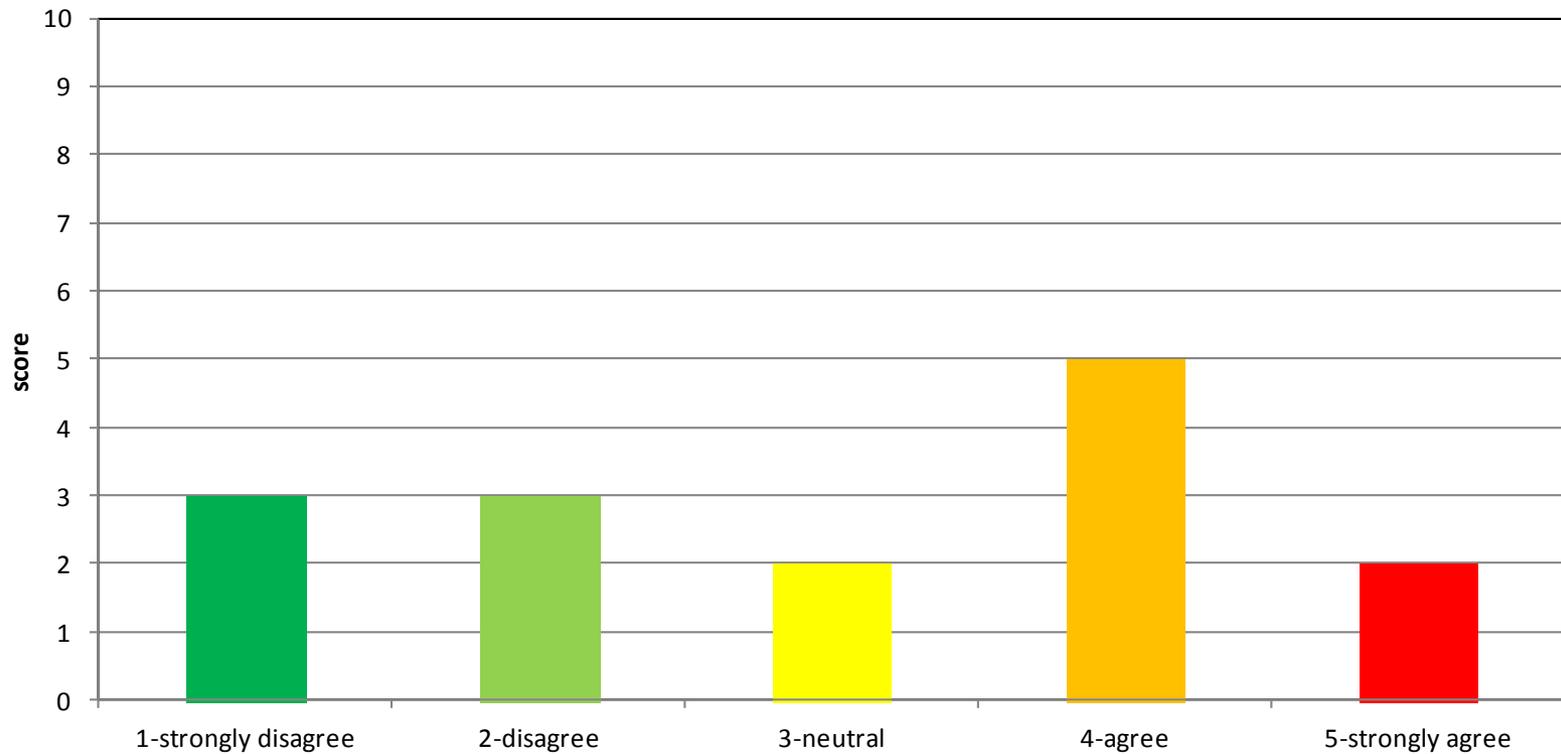
Some countries externalise model services and, therefore, **economic resources** to accomplish this task are needed (PO, PT, GR).

Others indicate that resources are also needed to **coordinate** modeling services at the **national and regional levels** because local authorities responsible for air quality management do not have enough resources to maintain highly specialised modeling teams.

Among those who do not consider costs as an issue, there are countries that see in modelling an **opportunity for savings** by reducing measurements (UK).

3

## Too expensive and/or time consuming



## Brings too little added value (average score: 1.7)

There is a general consensus about the added value of modelling for understanding and assessing air pollution.

In general, modelling is seen as a **complement of measurements**.

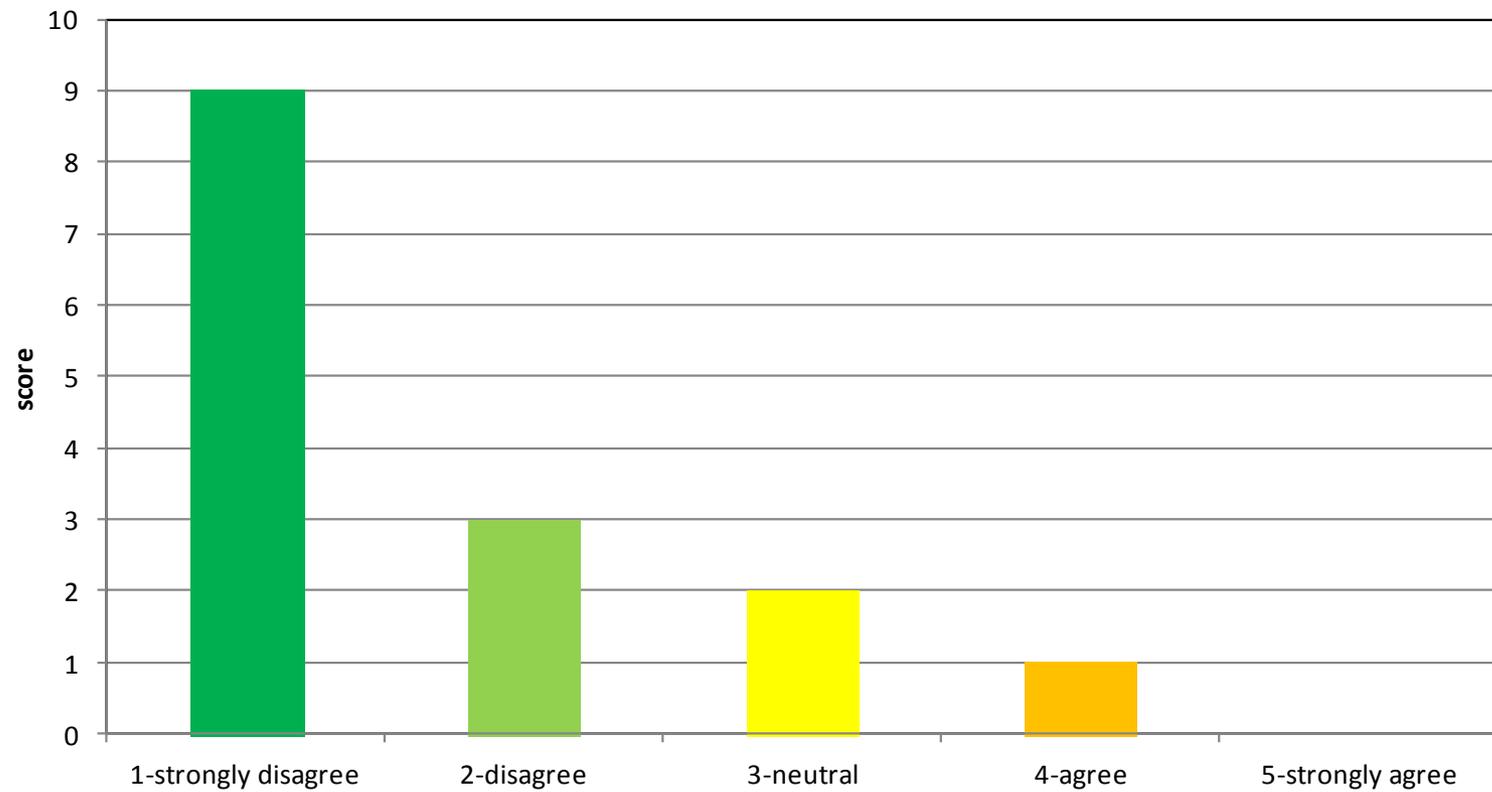
In particular, models are considered useful:

- to improve the **spatial coverage**,
- to provide **forecast** capabilities,
- to identify **sources**, and
- to **support authorities** responsible for air quality management.

The lack of added value is not considered a cause for not submitting modelled data.

4

## Brings too little added value



## Lack of clear and common guidelines (average score: 3.4)

Many countries point out the **need to improve** the technical guidelines for modelling and model output interpretation.

Nevertheless, this is not always considered as a cause for not submitting modelled data.

Lack of clarity was mentioned by NCPs about the following aspects:

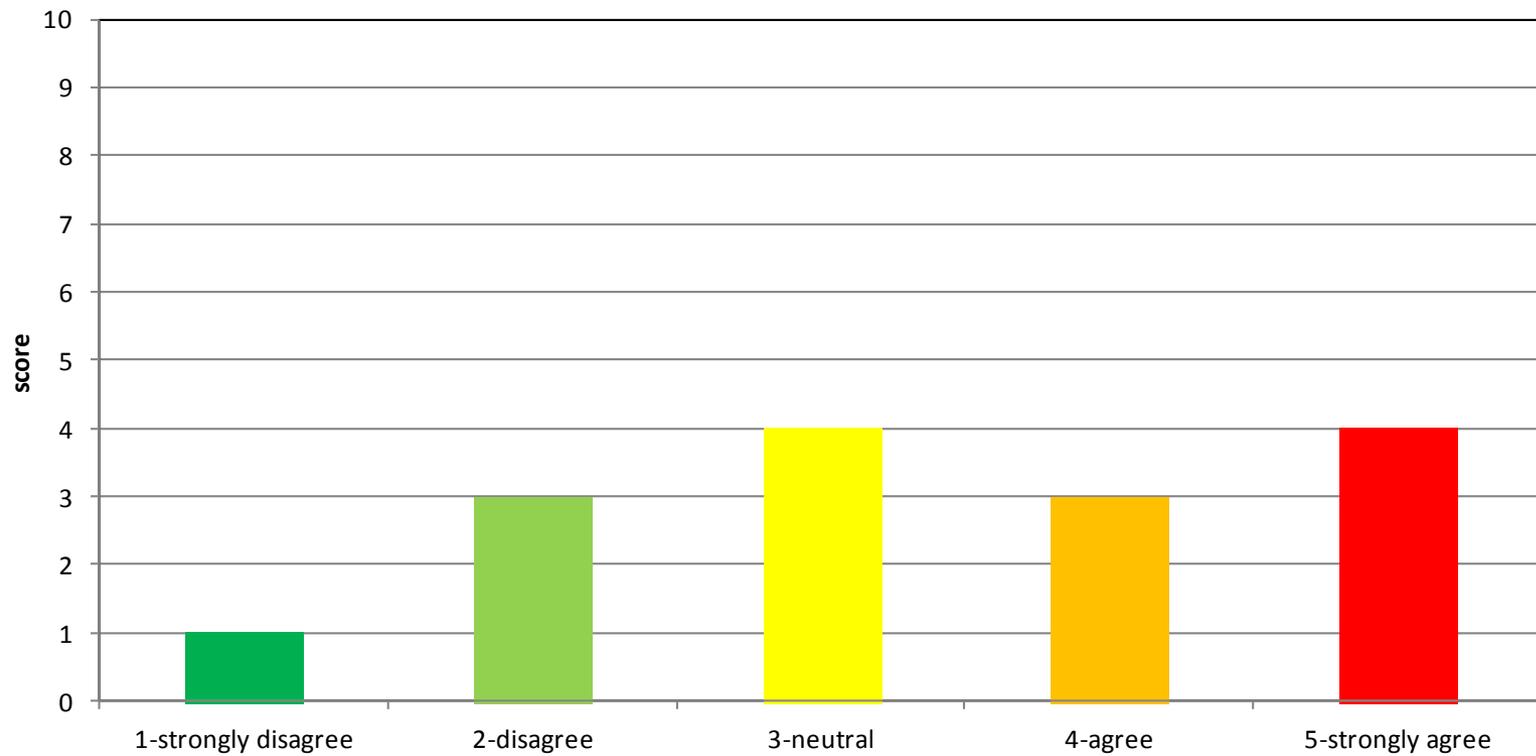
- definition of the **area of exceedance**,
- coherence among different **geographical scales**,
- coherence among **emission inventories** and
- application of **model performance indicators**.

Some countries also mention the need of **technical guidelines and best practices** for model operation.

Drafting **technical standards** is considered a useful contribution to the process.

5

## Lack of clear and common guidelines



## Limitations of administrative kind (average score: 3.1)

The NCPs expressed **different views** about administrative restrictions to report modelled data.

In some cases the motivations coincide with those expressed in other questions: **lack of staff and funds**.

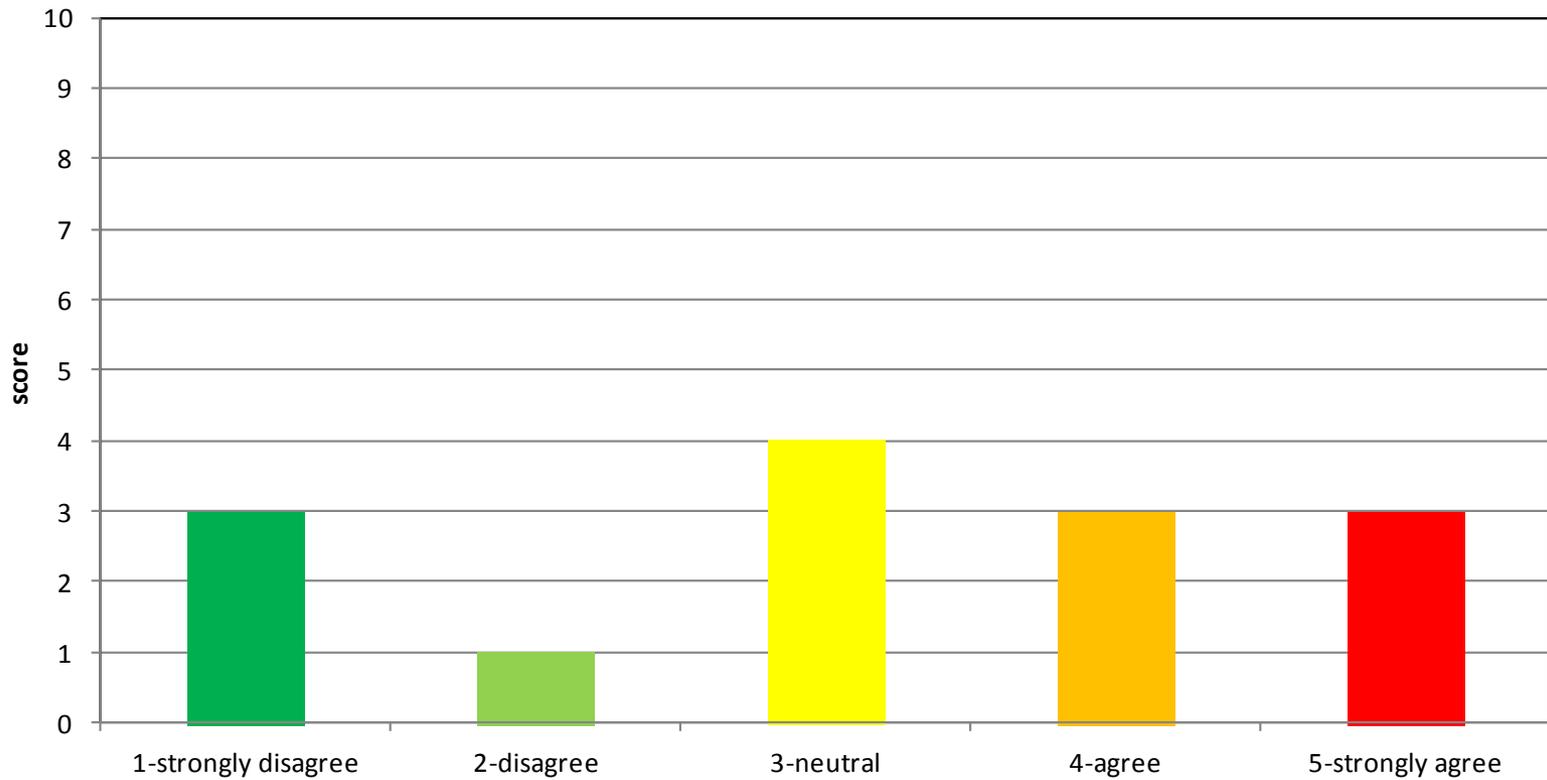
A number of NCPs report

- lack of national schemes to collect modeled data and
- significant administrative problems to **coordinate the regional competent authorities**.

Some of the experts consider the **deadline for data submission too short** compared with the time required to achieve model final output.

6

## Limitations of administrative kind



## Lack of clarity in legislation (average score: 3.8)

There is a **general agreement** about the impact of the legislation as a limiting factor for reporting model output to the EU.

Some MS do not report modelled data simply because **this is not mandatory**.

In some MS, national schemes **only** consider the collection of **measured exceedances**.

Others claim it is not clear **when modelling can be considered suitable for assessment** with regard to the limit value.

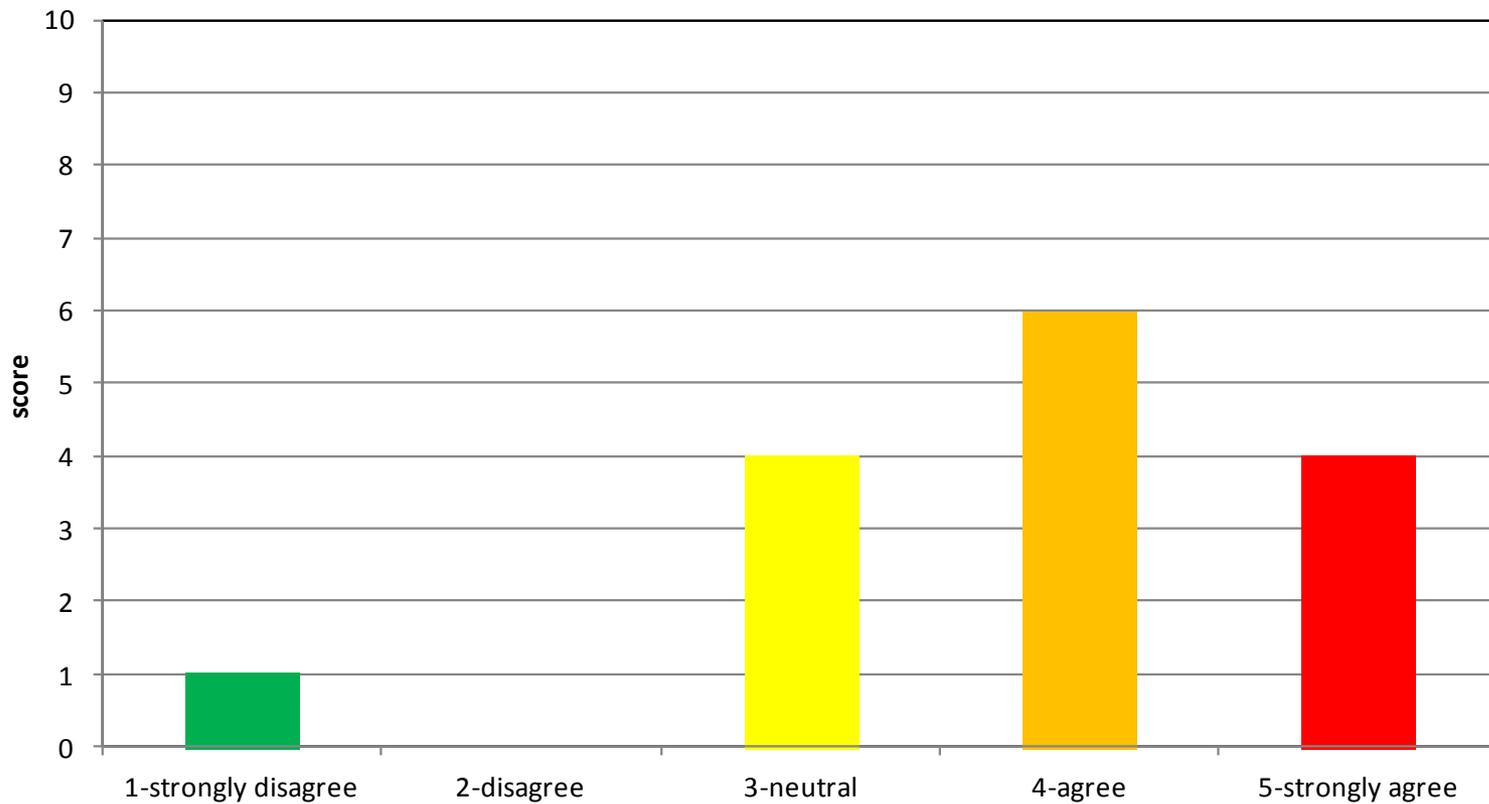
Moreover, there is a need to clarify **possible conflicts between modelled and measured data**. For example, how to deal with cases where models predict exceedances in areas not (sufficiently) covered by measurements?

Many NCPs consider the **legislation and the IPR imprecise and with too much space for interpretation**. Some of them believe there is too much flexibility and stress the need to define reference standard methods or reference models like in the US. A framework to ensure **equity and comparability** of modeling data reporting is needed.

A **univocal interpretation** of the ambiguities in the **legislation and official technical documents** made by European and national authorities is requested.

7

## Lack of clarity in legislation



## FAIRMODE Survey results

### Limiting factors for including modelled data in official reporting

	Average
Brings too little added value	1.7
Insufficient reliability of models	2.5
Lack of technical capacity	2.9
Too expensive and/or time consuming	3.0
Limitations of administrative kind	3.1
Lack of clear and common guidelines	3.4
Lack of clarity in legislation	3.8



strongly agree



agree



neutral

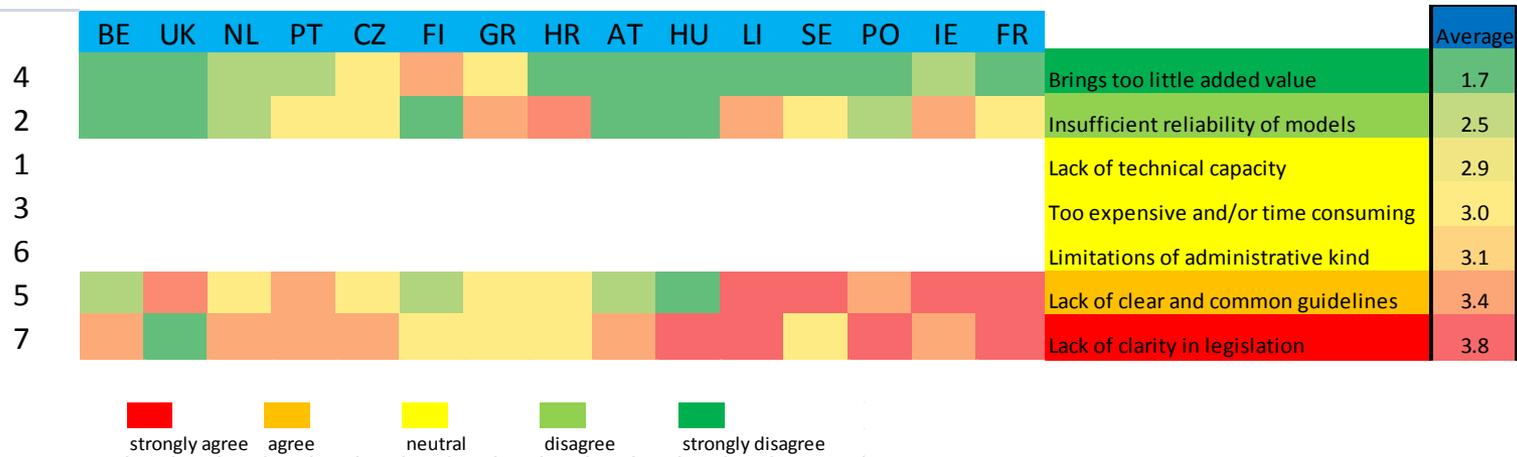


disagree

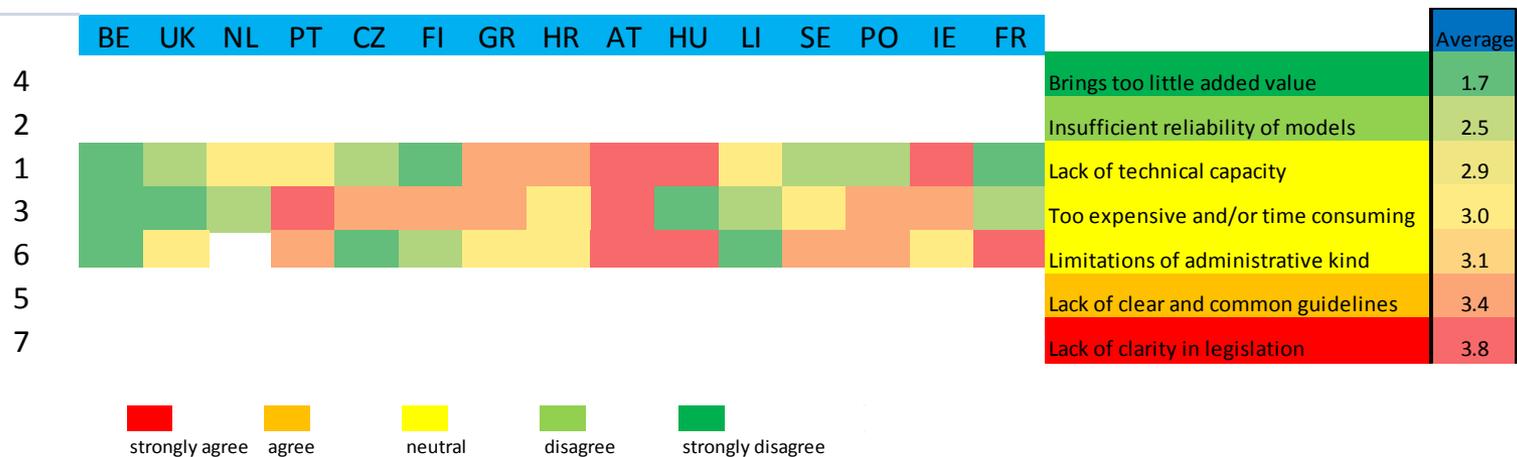


strongly disagree

## OVERVIEW OF ANSWERS BY COUNTRY



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# Summary

1. Most of the answers express the opinion that the little added value of models is not a problem for reporting.
2. In addition, there is a general agreement on the lack of clarity in the legislation as a limiting factor for reporting.
3. For the other proposed motivations the NCPs expressed different opinions.
  - a. The majority of the answers do not consider the reliability of models an issue.
  - b. Many answers agree that common guidelines are missing.
  - c. Finally, a wide range of opinions were expressed about the impact of administrative limitations, the lack of technical capacity and the resources (costs, staff, time) required for modelling.

## Concluding remarks

1. Analysis of the comments is still in progress
2. Countries wishing to participate are invited to submit their questionnaires

# Thank you for your attention

<http://fairmode.jrc.ec.europa.eu/index.html>