



# Evaluation of Regulation (EC) No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register (E-PRTR) and its triennial review

## Data Users questionnaire / interview proforma

Final questionnaire for distribution, 30 April 2015

**NOTE FOR NON-ENGLISH SPEAKERS:** If you would prefer to discuss and respond to the questionnaire over the phone in your native language, the project team contains proficient or native speakers of several European languages. To arrange this please contact:

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## Evaluation of Regulation (EC) No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register (E-PRTR) and its triennial review

### Introduction and Scope of Study

As part of its Smart Regulation policy to make EU law lighter, simpler and less costly, the European Commission is to undertake an evaluation of the E-PRTR Regulation.

The European Commission, DG Environment, has awarded a study contract to Amec Foster Wheeler Environment and Infrastructure UK Limited (lead) and the Institute for European Environmental Policy (IEEP). The study will conduct an evaluation of the Regulation to assess its effectiveness, efficiency, coherence, relevance and EU added value. The Evaluation Study will support the Commission in collecting and assessing evidence to assess the actual performance of the E-PRTR Regulation compared to initial expectations. In addition an assessment of the implementation of the Regulation will be carried out.

In particular, we will look at:

- ▶ Implementation, successes and problems;
- ▶ The costs of implementation and non-implementation of the legislation;
- ▶ The administrative burden of implementation and opportunities for improving implementation and reducing administrative burden without compromising the integrity of the purpose of the Regulation;
- ▶ The situation of implementation in different Member States;
- ▶ The views of key stakeholder groups on the E-PRTR including the website (<http://prtr.ec.europa.eu>).

This survey has been developed with the aim of gathering information and providing insight to support the evaluation and review of implementation across the EU Member States of the E-PRTR Regulation. Its focus is on questions and issues relevant for stakeholders that are mostly data users to the E-PRTR. Another questionnaire has been drafted for stakeholders that are mostly data providers.

Note that, in addition to this questionnaire, a public consultation will be available on the 'Your Voice in Europe' platform and will remain open for 12 weeks. This public consultation will aim at gathering views on the Regulation from a wider range of persons.

We expect that an interim report will be available in summer 2015. The consultants will present the preliminary outcome of the work at a workshop which will take place in autumn 2015 in Brussels. The results of the workshop will then be used to finalise the study. For further information please consult our website: <http://ec.europa.eu/environment/industry/stationary/eper/legislation.htm>.

### Overview of the questionnaire

The questionnaire comprises three main Parts:

- ▶ **Introduction** - Contact details and other relevant information including level of understanding of the Regulation
- ▶ **Part 1** – information on the implementation of the E-PRTR
- ▶ **Part 2** - the evaluation of the Regulation, in terms of:
  - ▶ **Effectiveness:** To what extent did the Regulation lead to the observed changes/effects? To what extent can these changes/effects be credited to the E-PRTR Regulation? To what extent do the observed effects correspond to the objectives?



- ▶ **Efficiency:** Were the costs involved justified, given the changes/effects which have been achieved? What factors influenced the achievements observed?
- ▶ **Coherence:** To what extent is the Regulation coherent with other interventions which have similar objectives? To what extent is the E-PRTR Regulation coherent internally?
- ▶ **Relevance:** To what extent do the (original) objectives (still) correspond to the needs within the EU?
- ▶ **EU added value:** What is the additional value resulting from the E-PRTR Regulation, compared to what could be achieved by Member States at national and/or regional levels?

At the end of each section, the questionnaire includes an open field for comments or additional information. Additional information can be attached to the survey response.

**Please complete all of the sections/ questions that you are able to.** Where you are not able to answer any of the questions – either through lack of data or because it is not relevant to your organisation – there is no need to provide a response. Where answers are uncertain, an estimate is more useful than no information at all. Where annual data is provided, please state the year, source and where relevant, please state the currency used in your answers.

If you would prefer to discuss the questionnaire over the phone rather than draft a written response do not hesitate to contact the consultants. We would also welcome any additional supporting documentation you are able to provide.

### Returning your completed questionnaire

Please provide information directly to the consultants by **29<sup>th</sup> May 2015** either by arranging a phone interview with or submitting a completed questionnaire to Victoria Cherrier. Her contact details are: victoria.cherrier@amecfw.com, +44 (0)20 3215 1610.



## I. Information concerning the organisation you are representing

a) Name of your company / organisation: \_\_\_\_\_ European Environmental Bureau (EEB)

Tick this box if you wish to remain anonymous

b) Please indicate the type of the organisation you are representing:

- Industry Operator
- Trade Association
- Competent Authority
- National level Environment Agencies
- European Environment Agency
- Civil society organisation
- Environmental NGO
- International organisation
- Research/academic institution
- EU institution
- Consumer group
- Citizen
- Other

If Other please include details on the type of organisation you represent: \_\_\_\_\_

c) Are you registered in the Commission's transparency register?

- Yes
- No

If yes, please provide your registration number: \_\_\_\_\_ **06798511314-27**

d) Please select below the Member State(s) in which you reside and is covered by this questionnaire

### EEB COVERS ALL EU 28

- |   |                                      |
|---|--------------------------------------|
| <input type="checkbox"/> Austria        | <input type="checkbox"/> Lithuania   |
| <input type="checkbox"/> Belgium        | <input type="checkbox"/> Luxembourg  |
| <input type="checkbox"/> Bulgaria       | <input type="checkbox"/> Latvia      |
| <input type="checkbox"/> Croatia        | <input type="checkbox"/> Malta       |
| <input type="checkbox"/> Cyprus         | <input type="checkbox"/> Netherlands |
| <input type="checkbox"/> Czech Republic | <input type="checkbox"/> Poland      |
| <input type="checkbox"/> Denmark        | <input type="checkbox"/> Portugal    |
| <input type="checkbox"/> Estonia        | <input type="checkbox"/> Romania     |
| <input type="checkbox"/> Finland        | <input type="checkbox"/> Spain       |
| <input type="checkbox"/> France         | <input type="checkbox"/> Sweden      |



- Germany
- Greece
- Hungary
- Ireland
- Italy
- Slovenia
- Slovakia
- United Kingdom
- EU level organisation
- Other (including non-EU countries)

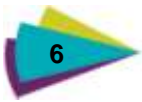
Please use the box below to provide any additional comments or information:

EEB COVERS ALL EU 28, so we wish to cover EU wide implementation of E-PRTR

## II. Level of understanding/expertise regarding the Regulation

a) Please indicate the level of understanding/expertise regarding the E-PRTR:

	High	Medium	Basic	None
E-PRTR Regulation	X			
Related legislation that affects data in the E-PRTR (i.e. IED or Water Framework Directive)	X			



## Part I – Implementation of the E-PRTR

### 1. Your use of the E-PRTR

1. What is your main point of access for PRTR data?

- E-PRTR website
- National level PRTR website
- EEA website for further information
- Other: \_\_\_\_\_

2. How often do you access the E-PRTR website?

- Once a month
- 7-11 times per year
- 2-6 times per year
- Less than once a year
- Never

3. What data do you access on the E-PRTR website?

- Emissions data to water
- Emissions data to air
- Emissions data to soil
- Transfer of emissions
- Information on specific industrial activities
- Information on specific pollutants
- Other: \_\_\_\_\_

4. What level of aggregation of data do you use?

- National level
- River-basin level
- EU level
- All reporting countries (i.e. EU and EEA countries)
- Facility level
- Area overview
- Other: \_\_\_\_\_

5. For what purpose do you access E-PRTR datasets?

- Academic research
- Policy development
- Other reporting requirements
- Information on local emissions
- General knowledge
- Other: \_\_\_\_\_ **Compliance assessment**



6. Do you make use of the E-PRTR reference library to gain further understanding of the pollutants and policy used in the E-PRTR<sup>1</sup>?

- Yes
- No
- I was not aware of the E-PRTR reference library

7. If the answer to the previous question was 'yes', do you find the information within the E-PRTR reference library useful?

- Yes
- No

Additional comment:

8. Do you use of the E-PRTR as a learning tool for education (i.e. schools, colleges or university)?

- Yes
- No

Additional comment:

## 2. Your experience with the E-PRTR

9. To which extent do you agree with the following statements

	Agrees fully	Agrees moderately	Somewhat disagree	Totally disagree	Comment
Data on emissions, pollutants and operators are easily accessible				x	Huge data gaps
It is easy to find the data that I am looking for				x	Huge data gaps, no search function, inconsistency on IDs of installations (different reporting identifiers for same installation)
The summary table which can be downloaded from the EEA website provides the right level of aggregation <sup>2</sup>				x	Huge Data gaps, does not meet our expectations
The data presented are complete and a true reflection of the pollutant releases and transfers of industrial activities				x	No parameters to enable assessment of environmental performance are available, huge data gaps

<sup>1</sup> The E-PRTR reference library is available at the following link: <http://prtr.ec.europa.eu/>

<sup>2</sup> The summary tables can be downloaded from the following link: <http://prtr.ec.europa.eu/>



The E-PRTR website is attractive and engaging	x	No multi query search function, not user friendly
The quality of the data is suitable for the use that I require	x	Huge data gaps, no multi query search function or essential parameters missing. No link to other databases (e.g. Seveso / Chemicals etc)
The quantity of data available is suitable for the use that I require	x	Huge data gaps, no multi query search function or essential parameters missing. No link to other databases (e.g. Seveso / Chemicals etc)
The option to engage with the custodians of the E-PRTR and provide feedback on my experience is clearly marked out and easy to do.	x	

### 3. What's next?

#### 10. To which extent do you agree with the following statements

	Agrees fully	Agrees moderately	Neutral opinion	Somewhat disagree	Totally disagree	Comment
Access to information held in PRTR has greatly improved in the last 10 years			x			
The quality of the information included in PRTR has greatly improved in the last 10 years					x	Huge data gaps, no multi query search function or essential parameters missing. No link to other databases (e.g. Seveso / Chemicals etc)
Training/information is required to make a better use of the information available			x			
Better data quality is required	x					
More comprehensive / complete datasets are needed	x					
Better reporting is required to get a full understanding emissions from industrial activities	x					





The scope of the E-PRTR Regulation should be extended to more pollutants. If yes, please indicate which.	x	Separate comments
The reporting thresholds presented in Annex II should be lowered for some pollutants. If yes, please indicate which.	x	Separate comments

11. Please indicate ways in which the access to PRTR data could be improved.

**Data access:** The system needs a complete overhaul in order to allow for multi query search. It is not practical to support compliance assessment or assessment of true environmental performance of the industry / specific operators / installations subject to reporting.

Streamlining of reporting to one shop access to environmental information needs to be established (e.g. link to chemical policy and accidents / waste prevention or water/air quality objectives)

As a first step the same model should be used as in the US EPA system

<http://ampd.epa.gov/ampd/>

- The current maps / overview (total annual emissions) can be kept but add-ons need to be established
- allowing specific query search on each of the installations covered by the E-PRTR (one stop portal search).

**Data Quantity / quality:**

The Multi query search should include the following parameters (missing in E-PRTR):

- Link to / incorporation of Continuous Emissions Monitoring (CEMs) data or other emissions data (water discharges), e.g. based on hourly averages in concentration levels over the year / real time monitoring. Same reference conditions and averaging periods of monitoring data as required under the relevant Best Available Techniques Reference Documents (BREFs) should be provided (i.e. hourly averages / daily averaged values); with indication of monitoring point (stack level, discharge point of flue gas outlet of the individual installation),
- All the parameters of the US EPA on “facility attributes” should be included: e.g. name of operator; name of owner; control types for common pollutants (NOx, PM, SO2, dust, heavy metals) with drop down menu for a list of the common techniques (see AMPD shortlist, to be further defined) ;specification of fuel types ( with sub-categories) used and quantity of fuels combusted; type of installations (combustion plants type); status of operation (commissioning date, last retrofit date etc); IED Annex I activity type (multiple choice) ; Rated thermal input / size category in accordance to the relevant BREF legal requirements;
- the facility id should be at “installation” level as per the IED (each combustion plant-not aggregated. Monitoring data should clearly identify where monitoring takes place). *NOTE there is no coherence between the LCP-D reporting and the E-PRTR reporting*
- a link / upload to the consolidated version of the latest permit (in pdf) should be established, link to national databases for further information should be provided
- Other key environmental information on installations should also be made available directly / and/or through built in weblinks that are checked which should cover ALL other data / information e.g. referred to under Article 24 of the IED, inspection reports referred to in Article 23 of the IED, annual compliance reports (Article 14 (1) d of the

**IED)**

- A notice on accidents / incidents should also be provided;
- If the installation is also falling under the Seveso III, ALL the additional information referred to under Article 14 and Annex V of the Seveso III Directive is also to be made available through the same portal: e.g. the safety report, the MAPP, the inventory of dangerous substances;
- The use / production or release of any Substance of Very High Concern (SVHC) under the candidate list of SVHC of the REACH Regulation or any substance identified as PS/PHS in the Water Framework Directive (including the candidate list substances) should be reported separately, with indication of name and identification numbers and exact tonnage volumes (if confidentiality is accepted with respective tonnage bands)
- A relationship to outputs (industrial activity) in relation to environmental impacts (e.g. use of hazardous chemicals, emissions or resource consumption) or compliance with Air quality objectives needs to be established. This needs refinement in accordance to the specific industrial activity concerned
- Regulatory status should be reported under a “tick-box” approach. This should for instance provide for the following parameters: if any of the derogations permitted under the IED have been requested by the operator: Art 15(4) derogation, peak load derogation, TNP derogation, LLD Derogation, district heating plant derogation, small isolated systems derogation, Art 31 derogation etc. The same approach could also be considered for use of specific SVHC (REACH) authorizations or substances of concern restricted but allowed for specific use / time-limited exemptions.

12. Have you encountered any technical issues and/or interpretation problems? If so, please elaborate. E.g. understanding the use of various codes within the E-PRTR, such as methodology, and where to find the explanations for this information when reviewing data

**There is no coherence between the LCP-D reporting and the E-PRTR reporting in terms of installation identifiers. It is difficult to find out which installation (combustion unit) is which, different names etc**

13. Do you think the E-PRTR website should have more material to understand data presented and how to make use of it (e.g. infographics, tutorials)?

- Yes  
 No  
 Do not know

Additional comment:



## Part II – Evaluation of the E-PRTR Regulation

### 1. Evaluation of the effectiveness<sup>3</sup> of the E-PRTR Regulation

14. To what extent do you think the Regulation have contributed to the following objectives?

Objectives	To a very large extent	To a significant extent	To some extent	To no extent	Not applicable/ Don't know	Comment
More public participation in environmental affairs					X	
Better knowledge of pollution and exposure to pollutants				X		It does not say anything about true environmental performance of the installation in relative terms
More transparency and accountability in environment management				X		
Improved environmental performance of activities causing pollution			X			Knowing the main sources of total pollution loads putting indirect pressure on the operators to lower emission volumes
Engagement of citizens in environmental decision making				X		

15. To what extent can the progress made towards the objectives (listed in question 14) reasonably be linked to measures of the E-PRTR Regulation?

- X  To a large extent  
 To some extent  
 To no extent  
 Do not know

16. To what extent does the reported data and possibilities for searching the data serve the objectives (listed in question 14) of the E-PRTR Regulation?

- To a large extent  
 To some extent  
X  To no extent  
 Do not know

17. For what purposes are the PRTR data used for?

**As it stands just giving an overview of total emissions loads per industrial activity. Enables comparison between member states for same activities. Provides overview of installations.**

<sup>3</sup> To what extent did the Regulation lead to the observed changes/effects? To what extent can these changes/effects be credited to the E-PRTR Regulation? To what extent do the observed effects correspond to the objectives?

18. Are you aware of a feature of your national PRTR that should be integrated to the EU PRTR? If yes, please describe the feature and its benefits.

19. What unexpected/unintended positive or negative changes can be identified as a result of the implementation of the E-PRTR Regulation?

	To a large extent	To some extent	To no extent	Provide comments
<b>Potential unexpected/unintended positive changes</b>				
Increased awareness of workers/ citizens regarding the importance of controlling emissions		X		
Emergence /development of related policies that would not necessarily have arisen in the absence of the Regulation		X		
<b>Other, please specify</b>				
<b>Potential unexpected/unintended negative changes</b>				
Data presented in E-PRTR contradicting other reporting systems		X		
Increased uncertainty on environmental performance of industrial installations		X		
Other, please specify:				

20. What other influencing factors (e.g. implementation by Member States, action by stakeholders, interaction between industry and authorities) can be identified, that contributed to the changes?

- Implementation by Member States
- Action taken by stakeholders
- Interaction between industry and authorities
- Other: political willingness to improve data quantity (+ quality) and access

Additional comment:

**A proper reporting portal could considerably facilitate the reporting obligations by Member States. Often it is only at the national level that reporting to EPRTR is done, whilst the data is available at the local level. Operators could directly report to the upgraded EPRTR system and thus avoid admin burden to local authorities / facilitate access of data to the national authorities in charge of reporting to the EU level.**

Use the box below to provide any comments or information you have concerning the above questions on **effectiveness**<sup>4</sup>:

<sup>4</sup> To what extent did the Regulation lead to the observed changes/effects? To what extent can these changes/effects be credited to the E-PRTR Regulation? To what extent do the observed effects correspond to the objectives?



See answers to question 11.

The EPRTR does not support any compliance promotion at installation level nor environmental standard setting because crucial parameters are not available to assess environmental performance (e.g. the review of the Best Available Techniques Reference Documents would benefit of considerable improvements if some basic information would be made available at the installation level). More information about progress towards meeting other EU policy objectives should be included in the reporting system.

## 2. Evaluation of the efficiency<sup>5</sup> of the E-PRTR Regulation

21. Please list and assess the benefits of the Regulation in the following terms:

Benefits	Very large	Significant	Some significance	Not relevant	Not applicable/ Don't know
Public participation in environmental affairs			X		
Better understanding of pollution and exposure to pollutants			X		
Transparency and accountability in environment management				X	
Improved environmental performance of (industrial) activities causing pollution				X	
Engagement of citizens in environmental decision making				X	
Advancement in process science driven by better understanding of the inputs and outputs				X	
Improvement of industry's environmental performance due to comparison with performance of industry at EU level				X	
Other, please specify:					

22. Please assess the benefits of the Regulation relative to the costs of implementing the Regulation:

Benefits are less than costs	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Benefits and costs are similar	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Benefits greater than costs	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Benefits much greater than costs	<input type="checkbox"/> Yes <input type="checkbox"/> No
Not applicable/Unknown	<input type="checkbox"/> Yes <input type="checkbox"/> No

23. Do you think that the benefits of the Regulation have increased over time:

- To a large extent
- To some extent
- To no extent
- Do not know

Please use the box below to provide any comments or information you have concerning the above questions on **efficiency<sup>6</sup>**.

<sup>5</sup> Were the costs involved justified, given the changes/effects which have been achieved? What factors influenced the achievements observed?

**A multi query search function with additional reporting parameters / access to other key information would facilitate considerably the efficiency of the EPRTR.**

**The Regulation mandates that the E-PRTR should serve as a tool for encouraging improvements in environmental performance, [...] and evaluating progress achieved" (recital 3) and should provide for a "solid database for comparisons and future decisions in environmental matters" (recital 4).**

**Yet we see a lack in achieving these objectives under the current setup.**

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<sup>6</sup> Were the costs involved justified, given the changes/effects which have been achieved? What factors influenced the achievements observed?



### 3. Evaluation of the coherence<sup>7</sup> of the E-PRTR Regulation

#### 24. To what extent is the E-PRTR Regulation coherent internally?

- To a large extent
- To some extent
- To no extent
- Do not know

Indicate which elements in the Regulation you believe are not internally coherent and add a short explanation.

#### 25. To what extent do you agree with the following statements?

	Strongly agree	Agree	Disagree	Not applicable/ Don't know	Please provide comment to illustrate your views. In case you disagree, to what extent has this affected the achievement of the objectives of the Regulation?
There are no gaps in the areas the Regulation seek to cover			x		See answer to question 11
The Regulation and website are satisfactorily integrated, complementary and coherent with other pieces of EU legislation (no overlaps, discrepancies, contradictions), including:					
- Directive 2009/29/EC establishing the Emissions Trading Scheme					
- Directive 2010/75/EC on Industrial Emissions			x		See answer to question 11; There are fundamental gaps also in view of Article 13 (solid databasis for BREF reviews)
- WISE <sup>8</sup>					
- Waste Management Statistics <sup>9</sup>			X		The reporting is not consistent with EUROSTAT. The EPTRR should also list the relevant EU Waste codes for the waste transfers (see example of the French iREP system <a href="http://www.irep.ecologie.gouv.fr/IREP/menu.php?id=3&amp;sslite m=2#">http://www.irep.ecologie.gouv.fr/IREP/menu.php?id=3&amp;sslite m=2#</a> ). Certain waste code types identified through the

<sup>7</sup> To what extent is the Regulation coherent with other interventions which have similar objectives? To what extent is the E-PRTR Regulation coherent internally?

<sup>8</sup> WISE is available on the following link: <http://water.europa.eu/>

<sup>9</sup> Regulation (EC) No 2150/2002 of the European Parliament and of the Council of 25 November 2002 on waste statistics

					French reporting system make up high volumes (e.g. code 100207, 100308, 160601). A tracking system for these waste types should be established (destination to be reported)
- EMEP reporting under Directive 2001/81/EC on National Emission Ceilings for certain pollutants (NECD)				X	
- Directive 2007/2/EC establishing INSPIRE				X	
- Directive 96/82/EC on major accident hazards			x		See answer to question 11
The Regulation is satisfactorily integrated and coherent with international obligations in this field relevant to your Member State (e.g. Gothenburg Protocol)					
The Regulation is satisfactorily integrated and coherent with other reporting obligations (please precise which)			X		There is no integration we would wish to see (see Answer to question 11 and 26)

26. Please suggest how the Regulation and other policy and legislation could work better together.

**See Answer to question 11.**

**A merger of the databasis / reporting tools should be considered provided a multi-query search function is built into this system**

Use the box below to provide any comments or information you have concerning the above questions on coherence<sup>10</sup>.

**There is no coherence in the reporting (one global access portal). Reporting is split in silos with different competencies at the EU level (e.g. REACH ECHA / EPRTR EEA / eMars JRC Ispra / BREF review JRC Sevilla / LCP-D reporting DG ENV etc)**

<sup>10</sup> To what extent is the Regulation coherent with other interventions which have similar objectives? To what extent is the E-PRTR Regulation coherent internally?

#### 4. Evaluation of the relevance<sup>11</sup> of the E-PRTR Regulation

27. The objectives of E-PRTR are to: foster public participation in environmental affairs; provide better knowledge of pollution/exposure to pollutants; promote transparency and accountability in the sphere of environment management; improve environmental performance of activities causing pollution; effectively engage citizens in environmental decision making. To what extent do these objectives still correspond to current needs?

- To a large extent
- To some extent
- To no extent
- Do not know

Additional comment:

See answers to question 11.

The EPRTR does not support any compliance promotion at installation level nor environmental standard setting because crucial parameters are not available to assess environmental performance

28. Are you aware of any obsolete, unnecessary or missing provisions or gaps in the Regulation that is affecting its performance?

	Category	Ways in which the performance of the Regulation is affected
Annual reporting of data	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input type="checkbox"/> Missing	
Annual reporting from Member States under article 16	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input type="checkbox"/> Missing	
Reporting of off-site transfers of waste	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input type="checkbox"/> Missing	
Reporting of pollutants in waste water emissions	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input checked="" type="checkbox"/> Missing	Concentration levels + flow rate missing (should be same unit as MAC under the EQS Directive 2013/39/EU, Annex II)
Reporting of information including facility parent company, activity, pollutant or waste, environmental medium, diffuse sources and facility owner	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input checked="" type="checkbox"/> Missing	
Reporting of diffuse sources of pollution	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input type="checkbox"/> Missing	
Quality assurance requirements	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input checked="" type="checkbox"/> Missing	

<sup>11</sup> To what extent do the (original) objectives (still) correspond to the needs within the EU?

Reporting guidance document	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input type="checkbox"/> Missing	
Confidentiality provisions	<input checked="" type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input type="checkbox"/> Missing	
Penalty system	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input checked="" type="checkbox"/> Missing	
Other (please specify)	<input type="checkbox"/> Obsolete <input type="checkbox"/> Unnecessary <input checked="" type="checkbox"/> Missing	<a href="#">See answer to question 11./ The fundamental gap is also linked to the setup of the access to data</a>

29. To what extent does the Regulation contribute to the objective of the 7<sup>th</sup> Environment Action Programme ‘to improve the knowledge and evidence base for Union environment policy’?

- To a large extent
- To some extent
- To no extent
- Do not know

Additional comment:

**Some extend: an overview of the main pollutant loads is given, allowing identifying the main sources of pollution. However there are no indications in what ways relevant environmental quality standards (Air, water, hazardous chemicals substitution objectives) / resource efficiency or waste prevention objectives are affected/met by that specific installation nor the environmental track record of the operator.**

30. What technical or other progress has been made since the adoption of the Regulation?

31. Is there any new needs that could be addressed by the E-PRTR?

**Yes for sure. See answers to question 11. This relates to the compliance promotion, assessment of progress and facilitation of EU decision making processes due to improved reporting.**

Please use the box below to provide any comments or information you have concerning the above questions on **relevance**<sup>12</sup>.

<sup>12</sup> To what extent do the (original) objectives (still) correspond to the needs within the EU?



**See answer to question 23 and 27**

## 5. Evaluation of the EU-added value<sup>13</sup> of the E-PRTR Regulation

32. What is your (or your organisation's) overall view of the E-PRTR?

- Very positive
- Positive
- Neutral
- Low
- No opinion

33. How much do you value the existence of the E-PRTR?

- Very much
- Little
- Not at all
- No opinion

Additional comment:

**It is valuable to have but insufficient if we compare with other tools we consider more in line with 21<sup>st</sup> century reporting tools (user friendliness, data quantity provided) e.g <http://ampd.epa.gov/ampd/> Even China is making available online the CEMs monitoring data in real time. The EU is lagging behind in transparency. Policy makers do not realise the added value of more transparency and user-friendliness access of information in order to enable compliance promotion by the public / NGOs. The confidentiality of data is an unjustified excuse to the sole benefit of polluters which also brings significant administrative burdens for the competent authorities (needing to process access to document requests, face court cases etc).**

34. How much do you trust the data presented on the E-PRTR website?

- Very much
- Little
- Not at all
- No opinion

Additional comment:

**We trust in the EEA's ability to critically assess the data reported**

35. Do we still need to address the issues tackled by the Regulation at the EU level or is it sufficiently addressed at the Member State level and/or through standards?

- There is still need to address the issues tackled by the Regulation at the EU level
- PRTR is sufficiently addressed at the Member State level
- Do not know

36. What is the additional value from the E-PRTR Regulation compared to what could be achieved at national level?

<sup>13</sup> What is the additional value resulting from the E-PRTR Regulation, compared to what could be achieved by Member States at national and/or regional levels?

**User friendliness for end users (language barriers, one data portal access). Enable EU wide assessment / comparison due to different national implementation on industrial activities (same activity / different environmental impacts).**

Use the box below to provide any comments or information you have concerning the above questions on **EU added-value**<sup>14</sup>.

**EEA is reliable institution which would also critically check the information reported.**

**Thank you very much for taking the time to participate in this study.**

Would you be open to further discussion regarding your feedback on the evaluation of the E-PRTR Regulation?

Yes

No

Please enter your email address below if you would like to be sent the outputs from this research:

[Christian.schaible@eeb.org](mailto:Christian.schaible@eeb.org)

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<sup>14</sup> What is the additional value resulting from the E-PRTR Regulation, compared to what could be achieved by Member States at national and/or regional levels?