E-PRTR Regulation revision - Targeted Stakeholder Survey

Response ID:419 Data

2. About you

1. Please provide the following details:

Your name: : Christian Schaible
Organisation name: : European Environmental Bureau (EEB)
e-mail address: : christian.schaible@eeb.org

Country of operation:

Other (please specify below)
Comments: all EU and neighboring countries

Stakeholder type:

Non-governmental organisation
Comments: see https://eeb.org/homepage/about/

After completing this survey, are you willing to be contacted for any clarification, a follow-up interview and/or further updates on the impact assessment?

Yes

Organisation size:

Please indicate the two-digit NACE code of your primary business sector:

3. Your use of pollutant registers

2. How often do you access pollutant registers?

	Never	Once per year or less frequent	Between once per month and once per year	Once per month	Between once per week and once per month	Once per week	More than once per week
A national pollutant release and transfer register					X		
The European Pollutant Release and Transfer Register (E-PRTR)					X		

3. What do you access the pollution register(s) for? (Multiple options can be selected)

To compare releases between activities, facilities, regions, etc.
To carry out trend analysis for specific pollutants or activities
To use the data for overall analysis of release data
Other (please indicate reason): Industrial Emissions Portal (EEA): compliance assessment / benchmarking, the E-PRTR does not satisfy this purpose however and neither the IED Register

4. Which data do you most often examine? (Multiple options can be selected)

Releases to air

Releases to water
Releases to land
Waste transfers
Releases from diffuse sources into air
Releases from diffuse sources into water

5. I am:

Neither of the above

4.

Is gathering and reporting the information to your competent authority time-consuming?

What is your estimate of how many person-days per year you need to collate and report the information to your competent authority?

Do you incur any other costs (beyond work time) to gather and report the information? If yes, please indicate.

5.

Is assessment of data quality time-consuming?

What is your estimate of how many person-days per year in total you need to assess the quality of data provided by facility operators?

For how many facilities are you responsible to assess the quality of data?

Do you incur any other costs (beyond work time) to assess the quality of data? If yes, please indicate.

6.

6. How would you rate the quality of the data in the E-PRTR?

Release to air : 0
Release to water : 0
Release to land : 0
Waste transfers : 0

7. How would you rate the completeness of the data in the E-PRTR?

Release to air : 0
Release to water : 0
Release to land : 0
Waste transfers : 0

8. Please rate the importance of the following aspects to improve the functioning and value of the E-PRTR. If 'Other', please explain below.

Inclusion of additional sectors : 70
Lowering activity thresholds : 73
Inclusion of additional pollutants : 100
Removal / decrease of pollutant reporting thresholds : 100
Availability in languages other than English : 36
Availability of contextual information (e.g. production volume, energy use, water use, raw materials consumption) for a facility : 100
Data comparability with regional, national and non-EU PRTRs : 100
Other (please explain below) : 100
Comments: explanation of variance of responses: We see purpose of reporting and availability of information (e.g. via E-PRTR) needs to be able to fulfill various functions, many functions are currently not met. The objectives to be met: a) Improved transparency and access to environmental information b) enable effective public participation in environmental decision-making c) improve environmental performance & sustainable development (activities) d) Improve corporate accountability on environmental management (operators) e) Track and improve progress in pollution reduction and identifying "hot spots" for prevention measures and priorities for action. The current structure and design of the E-PRTR fails to deliver on many of those objectives, in particular objectives b-e) and to lesser extend objective a): Information is limited to a limited set of pollutants emissions and not inputs (resources, use of chemicals), outdated when reported and is given out of context. It is not possible to: assess impacts or threats to health and/or environmental protection; to get a combined visualisation of air/water quality data in the surroundings of installations; assess compliance with permit conditions neither on how the activity performs against the EU Best Available Techniques conclusions (BAT-C) standards to prevent/minimise their negative impact. In general, the data access is not user friendly to enable comparison and benchmarking of the various industry sectors. Sustainable Development Goals (SDG) equally apply to decision-makers but progress tracking and reporting via the PRTR is missing. Hence it is "very important" to include additional sectors (70) but it would not do the job if that is under the current format and if contextual information is not added (100),which we consider even more important to address current deficit of the already covered activities. EEB asks to remove reporting thresholds where a monitoring requirement exists (e.g. Spanish approach), hence (73 or less) for the "lowering activity thresholds", for some sectors that is more relevant (e.g. mining / lifestock rearing..) See https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/

7. Problem 1: Activities and activity thresholds

9. How important is it to include the following (agro-industrial) activities in the scope of the E-PRTR Regulation?

CO2 capture and storage installations : 100
Upstream oil and gas industries : 100
Battery production and recovery : 80
Downstream ferrous metal processing activities: forging presses, cold rolling and wire drawing : 70
Ship dismantling : 90
Intensive cattle farms : 100
Intensive mixed livestock farms : 100
Intensive horticulture, i.e. growing plants (principally fruits and vegetables) under a roof or in greenhouses with high intensity use of water, energy, pesticides and fertilisers : 100

10. If included (see preceding question), what would be appropriate E-PRTR activity thresholds for the following activities? Please suggest threshold value, unit of measure and provide supporting information. Please leave blank if you don't know.

	Threshold	Unit of Measure
CO2 capture and storage installations	0	EEB suggested for inclusing in the scope of Seveso III Directive (this is high risk activities) at a threshold of 25tons (lower tier) and 1000 tons (higher tiers) so the threshold for regular reporting should be much lower than this, in particular because the activity is about capture and storage installations, hence the threshold should be set to '0', also to properly account for and verify all the industial activites doing carbon capture and use (CCU)
Upstream oil and gas industries	0	per crude outputs (m3) and trigger values of ressource inputs in extraction process
Battery production and recovery		
Downstream ferrous metal processing activities: forging presses, cold rolling and wire drawing		
Ship dismantling		depends on the intrants used and outputs, needs differentiated approach
Intensive cattle farms		per animal (livestock density factor)
Intensive mixed livestock farms		per animal (livestock density factor)
Intensive horticulture, i.e. growing plants (principally fruits and vegetables) under a roof or in greenhouses with high intensity use of water, energy, pesticides and fertilisers	why is this only for activities 'under a roof or in greenhouses"? what if high intensity of pesticides/fertilisers or water use in "open fields"/areas, why would that not be subject to reporting? - cross check with CAP eligibility	depends on the intrants used and outputs, needs differentiated approach. Cross check metrics with CAP eligibility criteria

11. For the following activities, how important is it to align the E-PRTR and the IED categorisations?

Gasification and liquefaction (E-PRTR activity 1(b)) - adopt the IED sub-categories with two types of fuel category (IED activity 1.4) : NA / Don't know

Cement and lime production (E-PRTR activity 3(c)) - adopt the IED product-related sub-categories in IED activity 3.1(a) and 3.1(b) and include an additional sub-category for Magnesium oxide production in kilns (IED activity 3.1(c)) : NA / Don't know

Hazardous and non-hazardous waste (E-PRTR activities 5(a) and 5(c)) – extend these activities to align with the IED activities 5.1(a)-(k), 5.2(b), 5.5 and 5.6 : NA / Don't know

Disposal of non-hazardous waste (E-PRTR activity 5(c)) - explicitly include the recovery of non-hazardous waste (IED activity 3.5(b)). : NA / Don't know

Disposal of non-hazardous waste (E-PRTR activity 5(c)) - adjust the scope to align with possible IED changes on the recovery of non-hazardous waste from biological treatment (IED Annex I activity 5.3(b)(i)) (to include certain activities with a capacity of less than 75 tonnes per day with increased risk for emissions to soils, such as biogas production or manure processing plants) : NA / Don't know

Independently operated industrial waste-water treatment plants serving an Annex I activity (E-PRTR activity 5(g)) – remove the 10,000 m3/day capacity threshold to align with IED activity 6.11 : NA / Don't know

Smitheries with hammers (E-PRTR activity 2(c)(ii)) - adjust the scope to align with possible reduction of the IED capacity threshold for smitheries (IED activity 2.3b) from the current limit of 50 kilojoule per hammer and where the calorific power used exceeds 20 MW : NA / Don't know

Landfills (E-PRTR activity 5(d)) - adjust the scope to align with possible inclusion of landfills (IED activity 5.4) where less than 10 tonnes of waste per day is received or where the total capacity is less than 25,000 tonnes : NA / Don't know

12. What would be the effect of aligning E-PRTR and IED activity categorisations as described in the preceding question? Please explain.

Facilitate my work

Comments: For Q11: explainer. The EEB has reservations as to "alignment" to IED activity thresholds since thresholds are to be revisited and date back for most to 1996, we call for a deeper scope redesign of the IED activities (e.g. redesign, removal of sub-differentiations etc hence ('NA/don't know'). On the other hand it is of added value to enable differentiated activities / to sort per activities so a streamlining in E-PRTR reporting would be helpful for more targeted assessment to specific activities, hence it would "facilitate" that the E-PRTR is at least covering / enabling to differentate by the IED activities entries. We see a bigger need for integration of environmental impacts of the product phase (outputs) and the following specific comments (more details in Aspect 2 +3 of EEB position) https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/ 1) re-design of the scope to be able to understand ration of environmental impact of the industrial activity versus public good/service provided (this relates to the metrics, contextual information) but also setup of the scope (including in IED) - include environmental footprint information no the outputs (products) 2) activities covered by any Multilateral Environmental Agreement (MEA) should be included , see work by UNECE KIEV protocol review 3) align classifications to the International Standard Classification code list / and or allow filtering 4) integrate resource consumption information (water, materials other resources), use and fate of chemicals of concern, embedded GHG footprints 5) for outputs and waste there is a lot of data that is available e.g. detailed information of waste code of the EU list of waste that should be integrated in the system (to enable better identification on circular economy potential, waste management related activities) 6) the system should be dynamic and integrate emerging substances of concern and take a substance group approach (see separate input as to substances and the OECD 177 "shortlist" as a minimum. Link with watch list (WaterFD) or REACH candidate list eligible substances, persistent mobile organic chemicals should be assessed in order to ensure the consistency across groups of substances with similar hazard properties

13. How important is it to clarify the definition of landfill releases by adding to activity 5(d) the words 'including flaring of vent gas'?

100

14. How important is it to extend the E-PRTR activity threshold to cover combustion plants with the following capacities?

1 – 5 MW : 100
>5 – 20 MW : 100
>20 – 50 MW : 100

15. For the purpose of legislative coherence, how important is it to lower the existing threshold for UWWTP from 100,000 p.e. to the options below? If 'Other', please specify.

1,000 p.e. : 100
2,000 p.e. : 100
5,000 p.e. : 100
10,000 p.e. : 100
50,000 p.e. : 100
Other. Please specify below : 100

Comments: the PRTR / revised Industrial Emissions Portal should cover waste water streams that have pollutants of concern and flow rates that warrant particular concern, hence the 'population equivalents' should not be the only determining factor of inclusion

16. How important is it to include the following industrial activities in the scope of the E-PRTR Regulation?

Metal working activities (e.g. manufacture of motor vehicles, computer, electrical, transport and other equipment) : NA / Don't

know

17. In addition to the activities mentioned in the preceding eight questions, are you aware of other (agro-)industrial activities with major environmental pressures in the EU and currently outside the scope of the E-PRTR? If yes, specify the activity, the relevant environmental pressures and supporting information:

Yes: EEB sees need to adress better the "diffuse emissions" from products. From a legal standpoitn we consider these as within the scope of the E-PRTR, but there is a serious implementation deficit. See more details in the EEB submission on PRTR and related UNECE work, notably as to scope eipie.eu/storage/files/Table%20I_for_Annex%20I%20EEB.xlsm + wider activities related points considerations eipie.eu/storage/files/Cover%20letter%20EEB%20submission%20FIN.pdf The threshold for mining activities are much too high and should be brought to at least 10ha or lower. For coal and lignite mining activities the treshold shall be removed due to high climate impact, ideml for any fossil fuel extraction or related bringing into the market (0 threshold).

If all changes suggested in the preceding questions were to be implemented, how would the revision of the scope of the E-PRTR Regulation with regard to activities and activity thresholds affect the time you spend on reporting information to your competent authority? Please indicate the number of additional person-days.

If all changes suggested in the preceding questions were to be implemented, how would the revision of the scope of the E-PRTR Regulation with regard to activities and activity thresholds affect the time you spend on quality-assuring the data provided by facility operators?

What is the particular change in scope of the E-PRTR Regulation with regard to activities and activity thresholds that would trigger the change in the work time spent on PRTR-related duties?

8. Problem 2: Pollutants and thresholds for reporting releases

18. Is it important to include the following pollutants in the scope of the E-PRTR Regulation?

	Releases to air			Releases to water			Releases to land		
	Not important	Important	NA / Don't know	Not important	Important	NA / Don't know	Not important	Important	NA / Don't know
17-beta-Estradiol (E2); 17-alpha-Ethinylestradiol (EE2); Estrone (E1)	X				X			X	
2-Ethoxyethanol / ethylene glycol monoethyl ether			X		X			X	
Acetaldehyde			X		X			X	
Aclonifen			X		X			X	
Acrolein	X				X			X	
Acrylamide			X		X				
Acrylic acid and its water-soluble salts			X		X				X
Acrylonitrile					X				X
Antimony and compounds (as Sb)		X			X			X	

Beryllium and compounds (as Be)		X			X			X	
Bifenox		X			X			X	
Bisphenol-A			X		X			X	
Carbamazepine		X			X			X	
Black carbon (BC)		X				X		X	
Carbon disulphide		X				X			X
Chromium (VI) compounds (as Cr)		X			X			X	
Cobalt and compounds (as Co)		X			X			X	
Cybutryne		X			X			X	
Cypermethrin		X			X			X	
Dichlorvos			X		X			X	
Dicofol			X		X			X	
Fluorinated ethers and alcohols		X			X				X
Formaldehyde (formalin)	X					X			
Glyphosate		X			X			X	
Hexabromocyclododecane (HBCDD)		X			X			X	
Hydrogen sulphide		X				X			X
Macrolide antibiotics (azithromycin, clarithroymycin, erythromycin)			X		X			X	
Manganese and compounds (as Mn)		X			X			X	
Microplastics, i.e. materials consisting of solid polymer-containing particles, where ≥ 1% w/w of particles have (i) all dimensions 1nm ≤ x ≤ 5mm, or (ii), for fibres, a length of 3nm ≤ x ≤ 15mm and length to diameter ratio of >3.		X			X			X	
n-Hexane		X				X			X
Neonicotinoids (Imidacloprid, Thiacloprid, Thiamethoxam, Acetamiprid, Clothianidin)		X			X			X	
Nitrogen trifluoride (NF3)		X				X			X
Nicosulfuron (herbicide)		X			X			X	
Per- and Polyfluoroalkyl Substances (PFAS) all PFAS		X			X			X	

as a group, or									
Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds		X			X			X	
Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOS-F)		X			X			X	
Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds		X			X			X	
PM2.5		X				X			X
Polychlorinated naphthalenes		X			X			X	
Pyrethroids (Bifenthrin, Deltamethrin, Esfenvalerate, Permethrin)		X			X			X	
Quinoxyfen			X		X			X	
Selenium and compounds (as Se)		X			X			X	
Short-chain chlorinated paraffins (SCCPs)			X		X			X	
Silver (biocide)			X		X			X	
Sulfamethoxazole			X		X			X	
Sulphates			X			X			X
Terbutryn			X			X			X
Thallium and compounds (as Tl)		X			X			X	
Tin and tin compounds (as Sn)		X			X			X	
Total suspended solids (TSS)	X				X			X	
Triclosan		X			X			X	
Vanadium and compounds (as V)		X			X			X	

19. If included (see preceding question), what would be appropriate E-PRTR thresholds for reporting releases? Please suggest threshold value and provide supporting information.

	Release to air - threshold value (kg/y)	Release to air - supporting information	Release to water - threshold value (kg/y)	Release to water - supporting information	Release to land - threshold value (kg/y)	Release to land - supporting information
17-beta-Estradiol (E2); 17-alpha-Ethinylestradiol (EE2); Estrone (E1)						
2-Ethoxyethanol / ethylene glycol monoethyl ether						
Acetaldehyde						
Aclonifen						

Acrolein						
Acrylamide						
Acrylic acid and its water-soluble salts						
Acrylonitrile						
Antimony and compounds (as Sb)						
Beryllium and compounds (as Be)						
Bifenox						
Bisphenol-A						
Black carbon (BC)						
Carbamazepine						
Carbon disulphide						
Chromium (VI) compounds (as Cr)						
Cobalt and compounds (as Co)						
Cybutryne						
Cypermethrin						
Dichlorvos						
Dicofol						
Fluorinated ethers and alcohols						
Formaldehyde (formalin)						
Glyphosate						
Hexabromocyclododecane (HBCDD)						
Hydrogen sulphide						
Macrolide antibiotics (azithromycin, clarithroymycin, erythromycin)						
Manganese and compounds (as Mn)						
Microplastics i.e. materials consisting of solid polymer-containing particles, where ≥ 1% w/w of particles have (i) all dimensions 1nm ≤ x ≤ 5mm, or (ii), for fibres, a length of 3nm ≤ x ≤ 15mm and length to diameter ratio of >3.						
n-Hexane						
Neonicotinoids (Imidacloprid, Thiacloprid, Thiamethoxam, Acetamiprid, Clothianidin)		Harmful to bees!		Harmful to bees!		Harmful to bees!
Nitrogen trifluoride (NF3)						
Nicosulfuron						
Per- and Polyfluoroalkyl Substances (PFAS) all PFAS as a group, or						
Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds						

salts and PFHxS-related compounds						
Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOS-F)						
Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds						
PM2.5						
Polychlorinated naphthalenes						
Pyrethroids (Bifenthrin, Deltamethrin, Esfenvalerate, Permethrin)						
Quinoxyfen						
Selenium and compounds (as Se)						
Short-chain chlorinated paraffins (SCCPs)						
Silver (biocide)						
Sulfamethoxazole						
Sulphates						
Terbutryn						
Thallium and compounds (as Tl)						
Tin and tin compounds (as Sn)						
Total suspended particulate (TSP)						
Total suspended solids (TSS)						
Triclosan						
Vanadium and compounds (as V)						

Comments: - there should be no threshold set, if the substance is monitored why apply threshold on reporting? Rather the relevant threshold is "detection limit" and should be aligned to the state-of-the-art situation of monitoring standards (e.g. CEN) -irrespective of the previous point, for substances with PBT or P or B properties we oppose any thresholds due to accumulation and persistency in the environment as well as for CMR or other pollutants with hazard properties of equivalent concern. - please check and compare with US TRI list. The "OECD shortlist" (ENV/JM/MONO 2014 - 32 OECD "short" list is listing in its option 2 list 177 pollutants. The EEB supports to report on the option 2 of the OECD "shortlist" (177 entries) as an absolute minimum; See further comments made by the EEB to the UNECE context eipie.eu/storage/files/Table_II_for_Annex%20II%20EEB.xlsx Add the following as a group (no threshold): - Persistent mobile organic chemicals (PMOCs) - group - PMOC: Trifluoromethanesulfonic acid and its halogenated homologues - PMOC: 1-napthalenesulfonic acid - PMOC: 1,3, di-o-tolylguanidine - PMOS: GenX (2,3,3,3,-tetrafluoro-2 (heptafluoro-propoxy) propanioc acid. AKA FRD-903 or HFPO-DA - Substances that are meeting the properties of a substance of very high concern according to Article 57 of REACH" should be added. As a minimum "Substances that are listed to the 'candidate list' referred to in Article 59(10) of REACH" should be added. Those are the highest concern chemicals identified in the EU for substitution obligations. Adding this category to the PRTR would address the reporting deficit as to presence of those unwanted substances in imported articles and promote substitution efforts worldwide; - add "Substances and mixtures which are suspected or meet carcinogenic or mutagenic properties or properties which may affect reproduction in or via the aquatic environment" (to ensure a more precautionary approach); - "Substances and mixtures which are suspected or meet carcinogenic or mutagenic properties or properties which may affect reproduction via the air" (to ensure a more precautionary approach); "Substances listed in Annex X to Directive 2000/60/EC and the watch list substances pursuant to Article 8b of Directive 2013/39/EU" (those substances are identified as priority pollutants for further monitoring, reporting and source control measures)

20. How important is it to implement the following mechanisms? Please explain your answers.

"Sunrise" mechanism: pollutants of emerging concern are periodically considered for addition to the E-PRTR : 100
"Sunset" mechanism: E-PRTR pollutants, for which releases are reported in very low quantities for a number of years, are periodically considered for removal from the list : 100
Comments: Sunrise mechanism: we support the E-PRTR to be a more "dynamic instrument", the aim is to help identifying the sources of the pollution and where they end up in the environmental media so to better act at source. If one MS is reporting a pollutant from a given activity (source) it is expected to be a similar issue for the same activities in another MS/ country. The question is what this "periodicity" should look like, we propose a fast-track system (dynamic update link). Sunset: reporting a substance with "very low quantity" does not mean it is of "very low impact" e.g. PCCD/F, there is no rationale to remove those substances from reporting if the monitoring of that substance is still in place (also due to compliance reasons / benchmarking vis à vis other EU environmental/human health protection acquis objectives). Even if the use of a given substance is "banned" and hence it is unlikely of being released / transferred it is not certain that substance will not appear in the future again, in those cases the reporting will be indicating "0" for obsolete substances. For many substances there is also a major accident risk due to the presence of the (dangerous) substance, even if used /stored under strictly controlled conditions (no release or transfer occurring), therefore it is relevant to report about the presence and use of those substances, even if used as intermediate under strictly controlled conditions. However in some cases even obsolete pollutants e.g. POPs, banned pesticides, Asbestos etc may be relevant for waste treatment activities (their elimination) so should not be removed. See comments in Q19 as to the threshold question

21. Are there any other pollutants that should be considered for inclusion in the scope of the E-PRTR Regulation? Please justify your suggestions.

General comment to all substance groups / also those not listed (see answer to Q 19):
- there should be no threshold set, if the substance is monitored why apply threshold on reporting? ("data is there so use it")
- irrespective of previous point, for substances with PBT or P or B properties we oppose any thresholds due to accumulation and persistency in the environment
- Check US TRI list (if it is relevant to the US it is most likely relevant to EU as well)
See further comments made by the EEB to the UNECE context eipie.eu/storage/files/Table_II_for_Annex%20II%20EEB.xlsx
Add the following as a group (no threshold)
- Persistent mobile organic chemicals (PMOCs) - group
- PMOC: Trifluoromethanesulfonic acid and its halogenated homologues
- PMOC: 1-napthalenesulfonic acid
- PMOC: 1,3, di-o-tolylguanidine
- PMOS: GenX (2,3,3,3,-tetrafluoro-2 (heptafluoro-propoxy) propanioc acid. AKA FRD-903 or HFPO-DA
- Substances that are meeting the properties of a substance of very high concern according to Article 57 of REACH
- Substances that are listed to the "candidate list" referred to in Article 59(10) of REACH
Rationale: these are substances with proven properties of concern or of "emerging concern".

22. Are there any pollutants that should be considered for removal from the scope of the E-PRTR Regulation? Please justify your suggestions.

	To be considered for removal?	Justify your suggestion
Methane (CH4)		object removal see related A to Q20 on the "sunset" proposal
Carbon monoxide (CO)		object removal see related A to Q20 on the "sunset" proposal
Carbon dioxide (CO2)		object removal see related A to Q20 on the "sunset" proposal
Hydrofluorocarbons (HFCs)		object removal see related A to Q20 on the

Hydro-fluorocarbons (HFCs)		"sunset" proposal
Nitrous oxide (N2O)		object removal see related A to Q20 on the "sunset" proposal
Ammonia (NH3)		object removal see related A to Q20 on the "sunset" proposal
Non-methane volatile organic compounds (NMVOC)		object removal see related A to Q20 on the "sunset" proposal
Nitrogen oxides (NOx/NO2)		object removal see related A to Q20 on the "sunset" proposal
Perfluorocarbons (PFCs)		object removal see related A to Q20 on the "sunset" proposal
Sulphur hexafluoride (SF6)		object removal see related A to Q20 on the "sunset" proposal
Sulphur oxides (SOx/SO2)		object removal see related A to Q20 on the "sunset" proposal
Total nitrogen		object removal see related A to Q20 on the "sunset" proposal
Total phosphorus		object removal see related A to Q20 on the "sunset" proposal
Hydrochlorofluorocarbons (HCFCs)		object removal see related A to Q20 on the "sunset" proposal
Chlorofluorocarbons (CFCs)		object removal see related A to Q20 on the "sunset" proposal
Halons		object removal see related A to Q20 on the "sunset" proposal
Arsenic and compounds (as As)		object removal see related A to Q20 on the "sunset" proposal
Cadmium and compounds (as Cd)		object removal see related A to Q20 on the "sunset" proposal
Chromium and compounds (as Cr)		object removal see related A to Q20 on the "sunset" proposal
Copper and compounds (as Cu)		object removal see related A to Q20 on the "sunset" proposal
Mercury and compounds (as Hg)		object removal see related A to Q20 on the "sunset" proposal
Nickel and compounds (as Ni)		object removal see related A to Q20 on the "sunset" proposal
Lead and compounds (as Pb)		object removal see related A to Q20 on the "sunset" proposal
Zinc and compounds (as Zn)		object removal see related A to Q20 on the "sunset" proposal
Alachlor		object removal see related A to Q20 on the "sunset" proposal
Aldrin		object removal see related A to Q20 on the "sunset" proposal

		sunset" proposal
Atrazine		object removal see related A to Q20 on the "sunset" proposal
Chlordane		object removal see related A to Q20 on the "sunset" proposal
Chlordecone		object removal see related A to Q20 on the "sunset" proposal
Chlorfenvinphos		object removal see related A to Q20 on the "sunset" proposal
Chloro-alkanes, C10-C13		object removal see related A to Q20 on the "sunset" proposal
Chlorpyrifos		object removal see related A to Q20 on the "sunset" proposal
DDT		object removal see related A to Q20 on the "sunset" proposal
1,2-dichloroethane (EDC)		object removal see related A to Q20 on the "sunset" proposal
Dichloromethane (DCM)		object removal see related A to Q20 on the "sunset" proposal
Dieldrin		object removal see related A to Q20 on the "sunset" proposal
Diuron		object removal see related A to Q20 on the "sunset" proposal
Endosulphan		object removal see related A to Q20 on the "sunset" proposal
Endrin		object removal see related A to Q20 on the "sunset" proposal
Halogenated organic compounds (as AOX)		object removal see related A to Q20 on the "sunset" proposal
Heptachlor		object removal see related A to Q20 on the "sunset" proposal
Hexachlorobenzene (HCB)		object removal see related A to Q20 on the "sunset" proposal
Hexachlorobutadiene (HCBD)		object removal see related A to Q20 on the "sunset" proposal
1,2,3,4,5,6-hexachlorocyclohexane(HCH)		object removal see related A to Q20 on the "sunset" proposal
Lindane		object removal see related A to Q20 on the "sunset" proposal
Mirex		object removal see related A to Q20 on the "sunset" proposal
PCDD + PCDF (dioxins + furans) (as Teq)		object removal see related A to Q20 on the "sunset" proposal
Pentachlorobenzene		object removal see related A to Q20 on the "sunset" proposal

Pentachlorophenol (PCP)		object removal see related A to Q20 on the "sunset" proposal
Polychlorinated biphenyls (PCBs)		object removal see related A to Q20 on the "sunset" proposal
Simazine		object removal see related A to Q20 on the "sunset" proposal
Tetrachloroethylene (PER)		object removal see related A to Q20 on the "sunset" proposal
Tetrachloromethane (TCM)		object removal see related A to Q20 on the "sunset" proposal
Trichlorobenzenes (TCBs) (all isomers)		object removal see related A to Q20 on the "sunset" proposal
1,1,1-trichloroethane		object removal see related A to Q20 on the "sunset" proposal
1,1,2,2-tetrachloroethane		object removal see related A to Q20 on the "sunset" proposal
Trichloroethylene		object removal see related A to Q20 on the "sunset" proposal
Trichloromethane		object removal see related A to Q20 on the "sunset" proposal
Toxaphene		object removal see related A to Q20 on the "sunset" proposal
Vinyl chloride		object removal see related A to Q20 on the "sunset" proposal
Anthracene		object removal see related A to Q20 on the "sunset" proposal
Benzene		object removal see related A to Q20 on the "sunset" proposal
Brominated diphenylethers (PBDE)		object removal see related A to Q20 on the "sunset" proposal
Nonylphenol and Nonylphenol ethoxylates (NP/NPEs)		object removal see related A to Q20 on the "sunset" proposal
Ethyl benzene		object removal see related A to Q20 on the "sunset" proposal
Ethylene oxide		object removal see related A to Q20 on the "sunset" proposal
Isoproturon		object removal see related A to Q20 on the "sunset" proposal
Naphthalene		object removal see related A to Q20 on the "sunset" proposal
Organotin compounds (as total Sn)		object removal see related A to Q20 on the "sunset" proposal
Di-(2-ethyl hexyl) phthalate (DEHP)		object removal see related A to Q20 on the "sunset" proposal

Phenols (as total C)		object removal see related A to Q20 on the "sunset" proposal
Polycyclic aromatic hydrocarbons (PAHs)		object removal see related A to Q20 on the "sunset" proposal
Toluene		object removal see related A to Q20 on the "sunset" proposal
Tributyltin and compounds		object removal see related A to Q20 on the "sunset" proposal
Triphenyltin and compounds		object removal see related A to Q20 on the "sunset" proposal
Total organic carbon (TOC) (as total C or COD/3)		object removal see related A to Q20 on the "sunset" proposal
Trifluralin		object removal see related A to Q20 on the "sunset" proposal
Xylenes		object removal see related A to Q20 on the "sunset" proposal
Chlorides		object removal see related A to Q20 on the "sunset" proposal
Chlorine and inorganic compounds		object removal see related A to Q20 on the "sunset" proposal
Asbestos		object removal see related A to Q20 on the "sunset" proposal
Cyanides (as total CN)		object removal see related A to Q20 on the "sunset" proposal
Fluorides (as total F)		object removal see related A to Q20 on the "sunset" proposal
Fluorine and inorganic compounds (as HF)		object removal see related A to Q20 on the "sunset" proposal
Hydrogen cyanide (HCN)		object removal see related A to Q20 on the "sunset" proposal
Particulate matter (PM10)		object removal see related A to Q20 on the "sunset" proposal
Octylphenols and Octylphenol ethoxylates		object removal see related A to Q20 on the "sunset" proposal
Fluoranthene		object removal see related A to Q20 on the "sunset" proposal
Isodrin		object removal see related A to Q20 on the "sunset" proposal
Hexabromobiphenyl		object removal see related A to Q20 on the "sunset" proposal
Benzo(g,h,i)perylene		object removal see related A to Q20 on the "sunset" proposal

23. For the overall effectiveness of the E-PRTR, how important is it to reduce reporting thresholds to capture 90% of industrial releases?

100

As suggested above, how would the revision of the scope of the E-PRTR Regulation with regard to pollutants and reporting thresholds affect the time you spend on reporting information to your competent authority? Please indicate the number of additional or fewer person-days.

As suggested above, how would the revision of the scope of the E-PRTR Regulation with regard to pollutants and reporting thresholds affect the time you spend on quality assuring the data provided by facility operators?

What is the particular change in scope of the E-PRTR Regulation with regard to pollutants and reporting thresholds that would trigger the change in the work time spent on PRTR-related duties?

24. Should the E-PRTR supporting guidance specify which pollutants must be reported for which activity? Please explain.

No
Comments: having this sort of guidance seriously risks to have contradictions e.g. the guidance may specify a risk based approach, give wrong impressions that for certain activities the pollutant is not relevant etc. The legal text should be sufficiently clear, hence no thresholds to apply and the scope to be exhaustive (some may interpretate reporting obligations to apply at facility level instead of the sub-installation level or process steps - aggregated- they consider "not covered" by the PRTR activity hence leading to salami slicing of thresholds)

25. Should the E-PRTR supporting guidance specify which release quantification method is to be used for reporting to the E-PRTR? Please explain.

Yes
Comments: it is very important that data is comparable and the data quality to be most accurate (data quality). For that reasons we propose the following minimal requirements as to the reporting and filtering/access to this information: a) obligation for measured data in accordance to state of the art monitoring requirements e.g. pollutants subject to continuous monitoring (CEM) should be reported as such and not calculated - When reporting is done the subtraction of measurement uncertainty (when made), level, date of last calibration and link to the third-party calibration report should be provided, this also includes reporting of reference conditions (re-aligned to the standard reference condition) - inclusion of releases during other than normal operating conditions (OTNOC) - EEB supports also the setting of proper metrics as to the reporting on the outputs and inputs for specific activities. This point relates to need and proposal of harmonisation of the annual compliance report data under the Art 14 of the IED (electronic report template) , see proposed format of that electronic annual compliance report template here https://eebbrussels.sharepoint.com/:x:/s/sustainableindustry/EXzGuyd6hgBCrlmmhi96u8UBjV1XB7-iYz5ays_RYsV3jw?e=gobWaf (please contact the EEB industry team for further information)

9. Problem area 3: Information to track progress towards the circular economy and decarbonisation of industry

26. How important is it to require the reporting of additional contextual information? If 'Other contextual information', please specify in the text box below.

Energy consumption : 100
Energy recovery / reuse : 100
Raw materials consumption : 100
Water consumption : 100
Percentage of water reused : 100
Composition of waste transfers : 100

Other contextual information : 100

Comments: We consider these elements all as extremely important if the E-PRTR is to provide for a meaningful contribution to benchmarking of activities and to enable tracking of progress,also to compare and understand "environmental performance" this needs to be put in relation to useful outputs of the activity in question. See more related points here (need to cover the products phase impacts as well) https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/ Since those items are legally required to be set in permit conditions and the BREF information exchange and relate to emissions into the environment all of those items may not be subject to CBI (see related position in the BREF context here https://www.google.com/search?client=firefox-b-d&q=EEB+and+proposal+Annex+CBI) - Another missing element as to reporting is related to the IED Baseline report (Art 22) as to presence of hazardous substances, the state of soil and groundwater pollution and site remediation measures. An electronic and harmonised reporting tool should enable the content of reporting about the presence of hazardous substances (inventory, sampling results), identification of issues linked to pollution and enable a a tracking of any remediation activities that have taken place, with third party (independent) verification of the results made (this links to reporting on waste transfers, in particular if the soil / water is contaminated). All the IED baseline reports need to be made publicly available through online direct access within the the Industrial Pollution Portal. The revised PRTR/IED should allow to see where this baseline report has not been made / last update.

How would these additional reporting requirements affect the time you spend on reporting information to your competent authority?

Comments:

How would these additional reporting requirements affect the time you spend on quality assuring the data provided by facility operators?

Comments:

27. How important is it to require reporting of disaggregated HFCs, HCFCs, CFCs and PFCs? Please explain.

100

Comments: This disaggregation is supported. Further aspects as to F-Gases /ODS are as follows (see more inputs on this within the EEB submission to TSS to IED review) For these reasons, the Commission should make the following amendments to IED and E-PRTR: Amend the IED to address emissions of F-gases and ODS at chemical plants in the EU. Currently, these gases are excluded from BREF/BAT discussions because they are not considered key environmental issues under the IED. This should be specifically addressed, namely through amendments to the IED itself to include an emission limit value (ELV) for emissions of these gases across all chemical plants in the EU, and in addition ensure that production is carried out under strictly controlled conditions, destruction efficiencies are in line with the best available techniques (e.g. at least 99.9%), monitoring methodologies are established and evidence of compliance is required. Amend the E-PRTR to include reporting of actual by-product and fugitive emissions of F-gases and ODS at all chemical plants in the EU and ensuring public access to reported information.

28. Which individual HFCs, HCFCs, CFCs and PFCs compounds / sub-groups should be reported?

disaggregate to the entries in F-GAS Regulation and also to the process steps, there is a deficit in the amount of use as a feedstock / by product or diffuse emissions. Also if there is production for export outside of the EU it should be subject to reporting obligations (see more information in EEB submission to TSS IED review)

10. Problem area 4: Reporting modalities and data flow

29. In order to reduce administrative burden, how important is it to introduce flexibility in E-PRTR reporting modality for certain sectors? E.g. national/regional collation for intensive livestock farming. Please explain.

0

Comments: We don't see a need as to sectors differentiator since those covered in the E-PRTR and IED are very large industrial scale activities that should be able to report and monitor their impact properly and need to report at least annually anyway in order to compare with the permit conditions (see IED Art 14). It could be relevant to apply emission factors only when there is case for feasibility / complication as to the release or emissions e.g. for 'diffuse emissions" from products (see Aspect 2 in https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/) Further where it is difficult or costly to measure like for potential diffuse emission sources in very large chemical facilities the satellite remote monitors should be used (to help on the ground monitoring) in the absence of real measurement at the source (to be prioritised)

30. Beyond the reduction of administrative burden, what are the pros and cons of adopting a top-down approach for certain activities?

we only see "cons" except where this affects data reliability.

31. How would the following approaches affect the time lag between end of a reporting year and the time that data become available on the E-PRTR? If 'Other' approaches, please explain.

Improved reporting system to submit data to competent authorities (e.g. immediately flags errors and inconsistencies and enables communication and tracking of follow-up questions) : 0
Near real-time reporting of CEMS data for certain activities : 100
Clearer guidance on what pollutants should be reported and what quantification method to use : 0
Guidance and tools to assist the competent authorities with the review process (e.g. earlier flagging of anomalies and typical discrepancies) : 52
Improved submission system to EEA, to receive feedback, and to resolve follow-up questions quicker : 81
Other approaches : 100

Comments: See related position made by the EEB under section 5 of the TSS for IED review (available on request) , this is directly related to E-PRTR setup. The EU needs to 'enter the digital age' in relation to reporting of industrial activities. https://meta.eeb.org/2020/10/22/industrial-pollution-its-time-to-enter-the-digital-age/ Significant time gains could be achieved by "direct" tele-reporting to a centralised EU database that also allows comparability and benchmarking (overcoming the EU language barriers), in this case the portal (E-PRTR and or Industrial Emissions Portal) would flag if the data is 'verified' or 'pending verification' but should NOT await raw data being made available. For many parameters there is a continuous monitoring (e.g. water input and output flow rates, CEM data for air pollutants including GHG, output data etc) requirement. The raw data shall be made directly accessible and not await "verification" by enforcement authorities. For other parameters such as permit conditions, BAT compliance uptake or change we do not expect these to change often,still those are very relevant for improving compliance promotion and performance benchmarking (also of the permitting and enforcement practice) . Main suggestions / comments (as made in the 2017 EEB Burning the Evidence and the 2020 dataviewer briefing) are as follows: To improve the data reporting situation, the EEB calls on the European Commission and the EEA to: • Reject any IED Registry reports that are either incomplete or contain misguiding information, such as dummy placeholders or fake weblinks; • Initiate infringement proceedings against member states that fail on proper reporting, make the information public, and block pending state aid decisions until these issues are fixed; • Reject "disappearing plants" (e.g. the German lignite units), and reintegrate data manually; • Amend without further delay the Commission Implementing rules on IED + PRTR reporting to achieve the following main objectives: o To set an EU IED permit report template for ELV reporting o To require direct and instant reporting (e.g. to the EEA) of the continuous emissions monitoring for air - and monthly averaged water - pollutants o To set harmonised reporting standard and require sharing on annual compliance report information (Art 14(1) point d of the IED) The EEB has elaborated a suggestion for an electronic reporting interface that could be used as a starting point. (Further details as to how a standardised format could look like is provided further below). • Improve integration of EU data-reporting, and notably: o Enable ENTSO-E matching with LCP-D Ids; o Enable the integration of water data (e.g. WISE); o Set metrics for production volumes EU level asks (as in pre-cited briefing): o Establish an EU single access database (improved IED registry). National and regional authorities should be linked to this database. o Increase database usability by providing useful search filters. o Allow better benchmarking of real-time environmental performance and better use of information for other purposes (e.g. BREF reviews) or compliance assessment against environmental quality standards. This includes a minimal list of permit conditions related information to be added, permit review status and production outputs information o Guarantee real time access to important data like flow rates, continuous emissions monitoring results. o Oblige

member states to provide data under a no-fee basis. Harmonise data structures by providing template of member states (e.g. IED Electronic Permit Template). Improve visibility and comparability of permit conditions, derogations, inspection reports and annual compliance reports (see more detailed proposal on the Art 14 annual compliance report below). o Improve the IED registry and revisit the PRTR to include diffuse emissions from products, in particular from SVHC, and enable progress tracking towards SDG achievement, with proper consultation of end-users, also by integrating information on environmental and health quality. o Monitor transposition and implementation regarding transparency in a Forum. More generally consult with NGOs and the public, and include them in this process, because they are an "end user" of that information. In this respect many thanks for reaching out to the EEB and we welcome further exchange on the substance in the course of the TSS process! • Possible way forward in relation to harmonisation of reporting formats for key IED documents (permits, compliance reports, but also potentially inspection reports and others). This would enable effective electronic integration into national and EU reporting portals. This approach would provide a level playing field across Europe and ensure that citizens in each Member State, and across the Union, are treated equally in terms of access to information and linked public participation opportunities in decision making and overcome language barriers that restrain comparability of information being supplied. Our proposal is the creation of two electronic templates: one to be filled-in with essential permit information such as the permit conditions, and the other with essential information of the related compliance report. It could also be possible to merge both reporting aspects in the annual compliance report since the annual compliance report enable a verification on whether the permit conditions are complied with. Operators across Europe would then have to directly fill-in these templates once they obtain the environmental data in question. An indication that 'the validation of the data is pending' may be needed in case more time is needed by the authorities to check the submitted data for verification, however this should not delay public access to the data. Such a system would remove administrative burdens linked to translation and EU level reporting whilst providing a real added value as to the usefulness of data reported for the purpose of compliance promotion, BAT identification and general benchmarking. The required basic elements of the permit / the compliance report that would be reported in these electronic templates (e.g. permit ELVs applied for various pollutants with averaging periods indicated) which in turn could be automatically extracted by the EU-level PRTR / IED register. It would further allow: • stakeholders acting at national or EU level to get easy access to information on equivalent industrial activities, allowing better benchmarking of environmental performance; • identification of hotspots to be identified for improvement opportunities, also improve collaboration within the industry to improve and learn from others; • better use of information available for other purposes e.g. BREF reviews; • an improved level playing field for industry'; The administrative burden could be reduced as Member States are already required to report on IED implementation to the European Commission, on an annual basis on releases (E-PRTR) and operators on an annual basis through the compliance report. Direct reporting based on streamlining of various reporting obligations through a harmonised standard to the EEA (in charge of the E-PRTR) could help automatised IT reporting systems to properly function. We further think that these developments would be aligned to the declared policy declarations for the EU to enter the "digital age". Possible model for annual compliance reporting. It is an 'electronic template' for the reporting in digital format that would enable the revised E-PRTR / 'Industrial Pollution Portal' interface to "data-mine" the supplied information (may be supplied by the operators / third party submitter/ enforcement agency etc). containing the core elements e.g. of a compliance report would look like. (Please consider the template at the link below as a first indicative format example) https://eebbrussels.sharepoint.com/:x:/s/sustainableindustry/EXzGuyd6hgBCrlmmhi96u8UBjV1XB7-iYz5ays_RYsV3jw?e=gobWaf We propose a template comprised by 11 sections: I. General information about the plant and the operator II. Air emissions data, incl. reference conditions, uncertainty, type of monitoring (incl. cell to upload raw CEM data), and emission intensity data (per production output) III. Water data, including on emissions, consumption and circular economy type of info (amount of waste water recycled) IV. Energy data, including on fuel type, energy efficiency and intensity V. Operating hours & Other than Normal operating Conditions (OTNOC) incl. measures undertaken to manage OTNOC occurrences VI. Resource consumption incl. fuel and chemicals, as well as measures to improve resource efficiency VII. Abatement techniques, incl. both methods of operation and technologies (as per the IED definition of 'technique'), retrofits, and plans of future retrofits linked to the on-going improvement of environmental performance, as demanded by standard Environmental Management Systems, this could also include information on scale of investments made by the operator or other useful information on best practice to prevent impact or continuously improve performance VIII. Waste management, incl. waste types, codes and destination (recycling / disposal) IX. Derogations X. Chemicals management XI. Other, incl. Information on noise pollution etc. It is also worth to highlight "performance" needs to be brought into context (namely the ratio of negative environmental impact versus the useful service or product provided by the industrial activity). Therefore defining the proper reporting metric is crucial and may need a differentiated approach for certain IED / E-PRTR activities. A further discussion on the "right" metrics is therefore welcome and should anticipate integration to the ongoing work by DG Connect on data integration and 8th EAP related work, notably within the "Green Deal data space" initiative. The E-PRTR and IED reporting tools need to fulfill their role

so to enable a proper reporting for the industrial and manufacturing activities, enabling an open data pooling and sharing for improved knowledge on progress as to preventing negative impacts further. The products output phase related information e.g. products manufacturing / use /fate related information generated by the product passport(s) initiative should be able to be "plugged" to the manufacturing related reporting phase, hence it is key to address the full life cycle of industrial activities.

32. What are the main challenges with their implementation?

	Challenge
Improved reporting system to submit data to competent authorities (e.g. immediately flags errors and inconsistencies and enables communication and tracking of follow-up questions)	we propose a "by-pass" step as to verification, for CEM data it is hardly ever checked by the enforcement authorities in a timely manner and automatic flags /quality controls are in-built. Raw data needs to be made available as it is generated (telereporting). The database will then flag on what is the status of reported data (raw, in verification process, verified/validated etc)
Near real-time reporting of CEMS data for certain activities	none, requires obligatory tele-reporting (mandatory) and a common format approach by EU as to enabling comparability and reliability of the data
Clearer guidance on what pollutants should be reported and what quantification method to use	see previous answer as to risk for counter-productive effects
Guidance and tools to assist the competent authorities with the review process (e.g. earlier flagging of anomalies and typical discrepancies)	See comments to Q31 (need to cut intermediates steps="bypass" competent authorities for reporting on raw data)
Improved submission system to EEA, to receive feedback, and to resolve follow-up questions quicker	See comments to Q31 (need to cut intermediates steps="bypass" competent authorities for reporting on raw data)
Other approaches specified in the preceding question.	See comments to Q31, a differentiated approach is to be made depending on what monitoring data that relates to

How would implementation of some or all of these approaches to reduce the time lag between the end of reporting year and availability of data affect your organisation? Please explain.

Comments:

11. Problem area 5: Access to E-PRTR information

33. How important is it to require releases to be reported at a 'sub-facility level', i.e. by installation? Please explain.

100

Comments: the EEB proposes to align to the smallest entity = "installation" as per IED definition, this level of reporting is anyway required and will help comparing with BAT-C requirements (see aspect 2 and 4+5 in https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/) An aggregation can always be made if the data is well reported to dis aggregated level, which is not possible the other way round.

34. How would reporting at installation level, rather than facility level, affect your workload?

100

Comments: significant positive impact, see Q33.

35. Do you find it easy to access and use published E-PRTR information? Please explain.

11

Comments: it is easy to access but it does NOT do the job of fulfilling various purposes (see https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/) and answers to previous questions + Q36. So the "effective usefulness" of the data is limited/insufficient (inputs/ consumption data, benchmarking of performance..) 'In-existent' information on various parameters and key information as previously mentioned: permit conditions, compliance report related, pollution intensity compared to the benchmark values of similar activities etc

36. Is the E-PRTR useful for the below purposes? If you answered that the E-PRTR is not useful for any of the below purposes, please explain and indicate how it could be improved.

To increase transparency in environmental information and decision making : 0
To increase engagement of the public in environmental information and decision making : 0
To inform policy development (national or EU) : 0
To increase the accountability of operators of polluting activities and provide an incentive to improve environmental performance : 0
To prevent and/or reduce environmental pollution : 0
To achieve the European Green Deal goals : 0
Comments: We have answered in depth on this point under previous questions in this TSS and also in Section 5 of the IED TSS (relevant here too) but can add in a nutshell again the following: 1) for local effects the data needs to be put in context with the situation regarding the Environmental Quality Standards (e.g. water quality, Air pollution, soil quality etc in the area). It is possible and desirable to put into context that information and overlay with the source relevant impacts. Also so to understand 'concerns' it is important to enable the citizen to put into context / compare the facility level performance with the "best in class" / average performance at EU level for the same facility, similarly that works very well for products e.g. Ecodesign criteria and labelling info. Pollution intensity information should be provided that enable a meaningful comparison. Information on proper implementation of Seveso III Directive requirements (safety distances, Safety report) etc information is not integrated. Baseline report relevant information hard to find. (These are also an argument /reason on why contextual information is so important) 2) there is hardly any information in relation to "decision making'. This is a huge gap (no permit relevant info, status of derogation,RSS feed option is provided) -> to fix also in the IED context and Industrial Pollution Portal. 3) since the status of decision making (potential for engagement opportunities) is not reported there is no ease of engagement in decision making or other sort of engagement is not incentivized / unclear) 4) Policy development related information is missing. There is a wider deficit as to transparency in decision making and public accountability in the Council or in wider COM expert groups. We would welcome if the E-PRTR could lift those shortcomings 5) accountability of operators is very limited since there is just a reporting obligation on the "business as usual" situation (annual pollution loads) on a limited set of pollutants. Due to the absence of reporting on contextual information that would enable to compare that performance vis à vis BAT standards (strict and the required upper level performance) , compare the permit conditions and more importantly to provide a rating as to best in class / average performance for same activity there is no or very low incentive to improve environmental performance. Irrespective of the previous point there is no reporting on the inputs (material consumption) and reporting on impacts of outputs such as from products is not even covered, hence there is only a very partial and limited reporting on the impact of a given activity (not the full life cycle stages e.g. upstream and downstream impacts). 6) see the limitations on preventing & reducing pollution as per answer provided in point 5. With "pollution" we mean negative impact to the environment and human health and not as current approach of referring to "releases" only. There is no reporting on the techniques/practices to prevent or reduce pollution at the source and during the full LCA. This is particularly important to consider for certain industries where the pollution impact may be even "exported " outside of the EU (e.g pesticides, Biocides production or LVOC production) 8) for the EU Green Deal: the PRTR could help tracking progress towards achieving the SDG and EU Green Deal objectives if the suggestions of the EEB are implemented, so far it does not;) For instance it would be useful to require the reporting against the"green oath" of all the EU decision makers when Union Standards, legislative changes or other key decisions are to be taken that have a cross-border impact / set a given precedent e.g. EU state aid decisions / COM positions as to amemdments tabled in the EP on Green Deal relevant files, policy options considered in Impact assessment work etc. It could be useful to set a list of Key Performance Indicators (KPIs) so to enable a rating of decision makers on how effective they achieve the objectives of the EU Green Deal. Those KPI's shall be used to rate all government positions on EU policy files that are relevant to the EU Green Deal delivery and the E-PRTR could provide transparency on the performance of decision makers against the set "green oath". The US EPA has suggested to use PRTRs as a tool for reporting against the SDGs and this initiative should be supported (see related work under the OECD http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=ENV/JM/MONO(2019)33&docLanguage=En For Q

37 (why 50/100?) Enabling all citizens to understand content is certainly important ... however what is more important than having the PRTR information translated in many languages is that the "data speaks for itself" and allows to overcome the language barriers that exist in relation to benchmarking and compliance promotion activities o industrial activities i.e. that in a few clicks the permit conditions and compliance report related data can be "compared with" this just required the translation of pollution names / headlines (the interface) but what counts most is that data is provided in user friendly format e.g. Excel datasets, exportable etc.. language cover is in fact secondary, the data needs to tell the same story (so data accuracy and comparability is more important)

37. How important is it for the E-PRTR to be available in languages other than English?

50

12. Problem area 6: Releases from diffuse sources and releases from products

38. Have you ever accessed the E-PRTR information on releases from diffuse sources?

Yes

39. How can the current E-PRTR information on releases from diffuse sources be improved?

Address more sources (Please explain)
Improved spatial resolution
Use methodologies specific to individual countries
More recent estimates
Estimates at regular intervals to develop a time series
Other (Please explain)

40. What would be the best way to compile estimates of releases from diffuse sources?

Other (Please explain): much information is also available through products related information systems e.g. Ecodesign/Ecolabel, SVHC content in waste streams/ articles (REACH) so it is possible to integrate that type of information (link with Sustainable Product Initiative). In the absence of measured data it should be possible to use emission factors, however those shoumld be standardised at EU level so to enable comparability (see the Norwegian PRTR system for reporting on products and OECD work on release estimation techniques - see further comment in Aspect 2 of https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/ and http://eipie.eu/storage/files/Cover%20letter%20EEB%20submission%20FIN.pdf

41. How important is it for the E-PRTR to estimate releases from products? Please explain.

100
Comments: As indicated earlier, not accounting of "diffuse emissions" from outputs such as products and wider environmental footprints (e.g. resource consumption) of industrial activities for the full life cycle (beyond the manufacturing site) is only giving a partial picture of the situation on pollution from industrial activities (this consideration related to scope setup of IED and PRTR. The situation can be considerably improved by enabling better data integration so to improve comparability, coherence (streamlining of data flows & quality) with related environmental quality standards and legislation (e.g. IED, WFD and UWWTP, REACH, Seveso III, Mercury, EU ETS, EIA alternatives screening, circular economy action plan requirements, Air quality, Product reporting (Ecolabel), SCIP database). This aspect is part of the objectives of wider INSPIRE / environmental monitoring network work and the EU Green Deal Data Space initiative.

42. What do you consider would be the best mechanism to derive estimates of releases from products?

Real measurements data extrapolated to representative data sampling basis, based on" worst case" assumptions that may be rectified where evidence to the contrary is provided. See OECD work on Release Estimation Techniques or EU Ecodesign /

labelling work. For products that are foreseen to be released to the environment under "normal conditions of use" (e.g. pesticides, biocides etc) the precise tonnage bands, destination and applications of use should be known and hence reported.

13. General

43. Please provide any other comment or suggestion you would like to share regarding the revision of the E-PRTR Regulation.

Please consider the related inputs of the EEB to the TSS on IED review, notably section 5 and in question 107.

The E-PRTR should be adapted to provide more focus on identifying action, progress, opportunities on pollution prevention and control, enabling compliance promotion and benchmarking of environmental performance (throughout the life-cycle) of industrial activities. User friendliness of the data submitted - for the different purposes and objectives- is to be improved.
It does not need to be a stand alone instrument but should fulfill the various needs of the other EU environmental acquis policy frameworks to track progress towards achievement of the set objectives, share better knowledge on how to continuously improve and rate efforts made by all economic actors to that end. It should thus also consider how the data can be used beyond the EU to achieve the SDG / EU Green Deal goals.

Other related materials on E- PRTR
- https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/
(and the links in that briefing)
- https://mk0eeborgicuypctuf7e.kinstacdn.com/wp-content/uploads/2020/09/EEB-briefing-on-highlights-on-Industrial-Plants-Data-Viewer.pdf
- https://eeb.org/library/power-for-the-people/
more general and policy context points https://meta.eeb.org/2020/10/22/industrial-pollution-its-time-to-enter-the-digital-age/