



## **Problems & policy options:**

### **Reporting issues & access to information**

**E-PRTR Revision Impact Assessment  
1<sup>st</sup> Stakeholder Workshop**

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# Agenda

- Introduction
- Reporting modalities
  - Alternatives to top-down approach
  - Reducing reporting period
  - Using advanced digital technologies
- Reporting issues
  - Tracking transfers
  - Inconsistencies in pollutants reported
- Other sources
  - Diffuse sources, releases from products
- Access to E-PRTR information
  - Improving availability, accessibility and context



# Introduction

- Problems and options for addressing when and how the data is reported and how information is made available

1. Sectors		2. Pollutants / parameters		3. Reporting modalities & access to information	
Existing scope	No change - baseline	Existing scope	No change - baseline	Existing approaches	No change - baseline
	Lower or no activity thresholds for specific sectors / groups of sectors		Lower or no reporting thresholds for specific pollutants / groups of pollutants	Top-down reporting	Selected sectors
New sectors	Different sectors	New pollutants / parameters	Different pollutants / parameters	Access to information	e.g. changes to website.
	Different activity thresholds		Different reporting thresholds	Other	e.g. advanced digital technologies



# Reporting modalities

- **Consider different approaches to the current bottom-up reporting** by individual facilities, while adhering to Kyiv Protocol obligations
  - Certain sectors have many small facilities with homogenous activities but the cumulative emissions are significant
  - Ensure a proportionate reporting burden for the size and impact of facilities and/or sectors
  
- **Policy options:**
  - Introduce top-down reporting for using relevant statistics for selected sectors, pollutants, and/or sizes of facilities
  - Mandate use of sector-specific emission factors in some cases
    - Applicability would depend on the potential environmental impact

# Reporting modalities

- **Provide more rapid access to information** by reducing the time lag between end of reporting year and availability of data
  - Aspirational goal of 3 months stated in recitals to the 2019 E-PRTR Commission Implementing Decision
- **Policy options:**
  - Reduce reporting period to 3 months
    - Focus on key sectors/installations
      - E.g. where continuous monitoring already required
    - Encourage faster reporting for other sectors
  - Require simultaneous direct reporting to EEA as well as to competent authorities

# Reporting modalities

- Reporting using **advanced digital technologies** can enable faster submission, review and publishing of continuous monitoring data
- **Enhanced reporting tools** could enable competent authorities to more quickly check and review submitted data

- **Policy options:**

- Mandate (near-)simultaneous reporting for certain installations where continuous emissions monitoring systems (CEMS) are used
  - Utilise on-line (web services) technologies to “pull” data
  - Clarify/codify QA/QC procedures, addressing data gaps
- Develop new “joint” reporting platform that can provide data to competent authorities and EEA simultaneously
- Enable parallel review processes, tracking of finalised data

# Reporting issues

- Waste transfers can be **double-counted**
  - Exact **destination of industrial wastewater transfers not known**
- **Policy option:**
- Fully track route of waste and wastewater transfers



# Reporting issues

- **Inconsistencies in pollutants reported** by facilities in the same sector and in the quantification methods used

- **Policy options:**

- Integrate IED monitoring requirements in permits and align with E-PRTR reporting
- Mandate reporting of expected pollutants and quantification method to be used for specific installations in permit requirements
- Permit could clarify which E-PRTR pollutants are unlikely to be released in reportable quantities for that activity



# Reporting issues

- **No mechanism to distinguish an absence of data** from misreporting – no confirmation of releases below threshold
- **Policy option:**
  - Require affirmation that expected pollutants for a sector are below reporting threshold or not present at all



# Other issues

- Estimates of **diffuse sources are a known area of weakness** in the E-PRTR. The previous limited exercises for releases to air and water are now substantially out of date.
  - Needed to complete full picture of industrial emissions; very smallest facilities will likely always be below reporting thresholds
  - Reporting of fugitive emissions from large, complex facilities is limited
- **Releases from products are an increasing concern**; not currently in E-PRTR

## ■ Policy options:

- Conduct regular top-down assessments on a 3 or 4-year timescale
- Derive information from other reporting mechanisms (NECD, WISE)  
Provide clearer guidance and/or requirements for how fugitive emissions from large, complex facilities should be estimated and reported

# Access to E-PRTR information

- **Public awareness and usage of the E-PRTR** could be improved
  - Complicated dataset, requires explanation of its structure, only available in English
  - Lack of contextual information for comparing environmental performance and relationship to regulatory requirements
- **Policy options:**
  - Improve promotion of availability of the E-PRTR
  - Enhance website design and content, better links to national PRTRs
  - Provide more guidance on how to access and use the data
  - Provide more context to data, e.g. include resource consumption data
  - Case studies/fact sheets on how it has been used by MS, European agencies and institutions, NGOs and researchers



# Thank you

Your comments will be  
greatly appreciated

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