

E-PRTR Regulation revision - Targeted Stakeholder Survey

Assessment of Options for Revision of the Regulation establishing the European Pollutant Release and Transfer Register (E-PRTR) – Targeted Stakeholder Survey

Objectives

The primary aim of the European Pollutant Release and Transfer Register (E-PRTR) is to improve public access to environmental information, allowing for the informed participation of EU citizens in environmental decision-making on the EU's largest (agro-)industrial activities. This targeted stakeholder survey will assist the European Commission in assessing possible legislative or non-legislative measures to improve implementation of the E-PRTR Regulation (EC/2006/166). The E-PRTR Regulation is closely linked to the Industrial Emissions Directive (IED) and there is a similar ongoing survey supporting revision of the IED.

The scope for revision of the E-PRTR Regulation is set out in this [inception impact assessment](#). To inform revision of the E-PRTR Regulation, work will be undertaken to understand the problems and their drivers, and to identify policy options that can address them in addition to achieving the overall policy objectives more efficiently, coherently and clearly.

The information gathered through this survey will be of great importance. It will be used to clarify the problems; identify synergies with revision of the IED; design policy options; define the baseline for the assessment; and assess the economic, social and environmental impacts of the selected policy options. This will enable comparison of the policy options against the baseline and will contribute to the Commission's impact assessment and staff working document.

RPA Europe, Aether and Air Quality Consultants are supporting the European Commission with the E-PRTR impact assessment, including stakeholder engagement activities. If you have any questions about this survey, please contact us at e-prtr.revision@rpa-europe.eu.

Overview

This survey is intended to gather feedback for the impact assessment from stakeholders involved in implementation of the E-PRTR Regulation. It groups questions under six problem areas that broadly reflect the inception impact assessment, namely:

1. Activities and activity thresholds
2. Pollutants and thresholds for reporting releases
3. Information to track progress towards the circular economy and the decarbonisation of industry
4. Reporting modalities and data flow
5. Access to E-PRTR information
6. Releases from diffuse sources and products

Survey instructions

The electronic interactive version of this survey contains questions based on which type of organisation you represent. The questions are tailored depending on whether you represent a Member State authority (at any level of administration), industry (individual company or trade association) or other stakeholder group (environmental NGOs, technical experts, academia and researchers). **This pdf version of the survey (for information, rather than to be filled in) includes all questions, for reference and for complete transparency.**

Where a question is not relevant to your experience or knowledge, please respond 'NA' (Not Applicable) and proceed to the next one. Or, if it is relevant but you do not know the response,

please respond 'do not know'. Where specific questions appear more relevant to other organisation(s) you are aware of, please forward the survey and invite them to respond.

The deadline for this survey is **Friday 30 April 2021**. You can only take this survey once.

N.B. You do not need to answer all the questions at the same time, as you can save your progress and complete the survey later. To return to the survey, you must provide a valid email address via the toolbar. A continuation link is sent to the provided email. When you use the Save and Continue feature, all survey progress up to that point is saved (including on the active page).

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About you

Page description:

Please provide the following details about yourself.

Your personal data provided for the survey (name, organisation name, email address and country of residence) will not be published. Information on the type of stakeholder group you are representing will be used for statistical analysis. Open text comments will be associated with country and stakeholder type.

The provision of personal data is not mandatory. However, if you do not provide your personal data, we will not be able to contact you with additional information to follow up your survey response.

Further information on how we process your personal data is available [here](#).

1. Please provide the following details:

Your name:

Organisation name:

e-mail address:

Country of operation:

- Albania
- Austria
- Belgium
- Bosnia and Herzegovina
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Kosovo - This designation is without prejudice to positions on status
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Montenegro
- Netherlands
- North Macedonia
- Norway
- Poland
- Portugal
- Romania
- Serbia
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- Turkey
- United Kingdom
- Other (please specify below)

Comments

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

- To review my own data
- To examine pollutant releases in my local area
- 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)

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

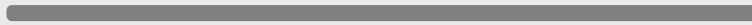
- Releases to air
- Releases to water
- Releases to land
- Waste transfers
- Off-site transfers of pollutants in waste water destined for waste-water treatment
- Releases from diffuse sources into air
- Releases from diffuse sources into water

7. I am:

- Responsible for providing data to a competent authority
- Responsible for checking the data provided at national level and forwarding them to the European Environment Agency
- Neither of the above

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

Not at all



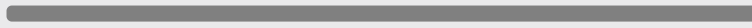
Very time-consuming

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

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

11. Is assessment of data quality time-consuming?

Not at all



Very time-consuming

Don't know

12. 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?

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

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

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

Very low

Very high

Release to air

Don't know

Release to water

Don't know

Release to land

Don't know

Waste transfers

Don't know

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

Very low

Very high

Release to air

Don't know

Release to water

Don't know

Release to land

Don't know

Waste transfers

Don't know

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

Not at all important	Very important
Inclusion of additional sectors	<input type="checkbox"/> NA/Don't know
Lowering activity thresholds	<input type="checkbox"/> NA/Don't know
Inclusion of additional pollutants	<input type="checkbox"/> NA/Don't know
Removal / decrease of pollutant reporting thresholds	<input type="checkbox"/> NA/Don't know
Availability in languages other than English	<input type="checkbox"/> NA/Don't know
Availability of contextual information (e.g. production volume, energy use, water use, raw materials consumption) for a facility	<input type="checkbox"/> NA/Don't know
Data comparability with regional, national and non-EU PRTRs	<input type="checkbox"/> NA/Don't know
Other (please explain below)	<input type="checkbox"/> NA/Don't know
Comments	

Problem 1: Activities and activity thresholds

Page description:
 E-PRTR is the main inventory of releases from industrial activities. It is used to evaluate progress with EU environmental policies and whether these measures are effective. Certain activities not currently covered by the E-PRTR Regulation are of environmental significance and are covered more fully by other EU environmental legislation including the Industrial Emissions Directive (IED), Medium Combustion Plant Directive (MCPD) and Urban Wastewater Treatment Directive (UWWTD). Importantly, because the E-PRTR Regulation and IED were developed at different times, their respective activities are similar but not identical. This limits the E-PRTR's potential for evaluating progress of the IED. Additional sectors are also being considered as part of the ongoing IED revision. Furthermore, other activities are covered in other PRTRs, in certain Member States and internationally.

This section of the survey gathers views about the importance of aligning the E-PRTR's sectoral coverage with the IED and other EU environmental legislation.

Activities regulated by the IED (and candidates for a revised IED).

Currently, CO2 capture and storage installations (IED activity 6.9) are covered by the IED and the Emissions Trading Scheme (ETS) but not the E-PRTR Regulation. Other (agro-)industrial activities are covered by neither the IED nor the E-PRTR Regulation but are considered for inclusion by the IED revision.

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

Not at all important

Extremely important

CO2 capture and storage installations

NA /
Don't
know

Upstream oil and gas industries

NA /
Don't
know

Battery production and recovery

NA /
Don't
know

Downstream ferrous metal processing activities: forging presses, cold rolling and wire drawing

NA /
Don't
know

Ship dismantling

NA /
Don't
know

Intensive cattle farms

NA /
Don't
know

Intensive mixed livestock farms

NA /
Don't
know

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

NA /
Don't
know

19. 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	<input type="text"/>	<input type="text"/>
Upstream oil and gas industries	<input type="text"/>	<input type="text"/>
Battery production and recovery	<input type="text"/>	<input type="text"/>
Downstream ferrous metal processing activities: forging presses, cold rolling and wire drawing	<input type="text"/>	<input type="text"/>
Ship dismantling	<input type="text"/>	<input type="text"/>
Intensive cattle farms	<input type="text"/>	<input type="text"/>
Intensive mixed livestock farms	<input type="text"/>	<input type="text"/>
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	<input type="text"/>	<input type="text"/>

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

Not at all important

Extremely important

Gasification and liquefaction (E-PRTR activity 1(b)) - adopt the IED sub-categories with two types of fuel category (IED activity 1.4)	<input type="text"/>	<input type="checkbox"/> 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))	<input type="text"/>	<input type="checkbox"/> 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	<input type="text"/>	<input type="checkbox"/> NA / Don't know
Disposal of non-hazardous waste (E-PRTR activity 5(c)) - explicitly include the recovery of non-hazardous waste (IED activity	<input type="text"/>	<input type="checkbox"/> NA / Don't know

3.5(b)).

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 wastewater 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

Pre-treatment or dyeing of fibres or textiles (E-PRTR activity 9(a)) - adjust the scope to align with the possible IED changes on the pre-treatment or dyeing of textile fibres or textiles (IED activity 6.2), to include textile finishing as well as activities below the current limit of treatment capacity (10 tonnes per day)

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

NA / Don't know

is less than
25,000 tonnes

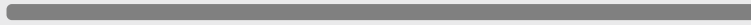
21. What would be the effect of aligning E-PRTR and IED activity categorisations as described in the preceding question? Please explain.

- Facilitate my work
- Make no difference to my current tasks related to the pollutant register
- Create difficulties

Comments

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

Not at all important



Extremely
important

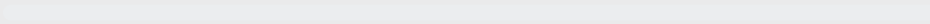
Don't know / Not Applicable

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

Not at all important

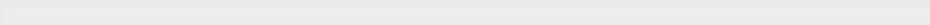
Extremely important

1 – 5 MW



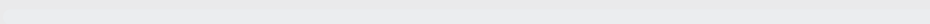
NA /
Don't
know

>5 – 20 MW



NA /
Don't
know

>20 – 50 MW



NA /
Don't
know

24. 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.

	Not at all important	Extremely important	
1,000 p.e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know
2,000 p.e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know
5,000 p.e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know
10,000 p.e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know
50,000 p.e.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know
Other. Please specify below	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know

Comments

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

	Not at all important	Extremely important	
Metal working activities (e.g. manufacture of motor vehicles, computer, electrical, transport and other equipment)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> NA / Don't know

26. 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

No

27. 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.

28. 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?

- | | | | | | | | | | | | |
|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|------------------------------------|-----------------------|-------------------------|-----------------------|-----------------------|--------------------------|-----------------------|
| Over
100%
decrease | 76-100%
decrease | 51-75%
decrease | 26%-50%
decrease | 5-25%
decrease | +/-5%
little or
no
impact | 5-25%
increase | 26%-
50%
increase | 51-75%
increase | 76-100%
increase | Over
100%
increase | Do not
know |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

29. 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?

Nicosulfuron	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Per- and Polyfluoroalkyl Substances (PFAS) all PFAS as a group, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOS-F)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PM2.5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Polychlorinated naphthalenes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pyrethroids (Bifenthrin, Deltamethrin, Esfenvalerate, Permethrin)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quinoxifen	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Selenium and compounds (as Se)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Short-chain chlorinated paraffins (SCCPs)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Silver (biocide)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sulfamethoxazole	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sulphates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Terbutryn	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thallium and compounds (as Tl)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tin and tin compounds (as Sn)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total suspended particulate (TSP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total suspended solids (TSS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Triclosan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vanadium and compounds (as V)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments

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

Not at all important

Extremely important

“Sunrise” mechanism: pollutants of emerging concern are periodically considered for addition to the E-PRTR

Don't know

“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

Don't know

Comments

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

34. 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)	<input type="radio"/>	<input type="text"/>
Carbon monoxide (CO)	<input type="radio"/>	<input type="text"/>
Carbon dioxide (CO2)	<input type="radio"/>	<input type="text"/>
Hydro-fluorocarbons (HFCs)	<input type="radio"/>	<input type="text"/>
Nitrous oxide (N2O)	<input type="radio"/>	<input type="text"/>
Ammonia (NH3)	<input type="radio"/>	<input type="text"/>
Non-methane volatile organic compounds (NMVOC)	<input type="radio"/>	<input type="text"/>
Nitrogen oxides (NOx/NO2)	<input type="radio"/>	<input type="text"/>

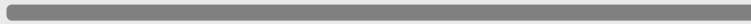
Perfluorocarbons (PFCs)	<input type="radio"/>	<input type="text"/>
Sulphur hexafluoride (SF6)	<input type="radio"/>	<input type="text"/>
Sulphur oxides (SOx/SO2)	<input type="radio"/>	<input type="text"/>
Total nitrogen	<input type="radio"/>	<input type="text"/>
Total phosphorus	<input type="radio"/>	<input type="text"/>
Hydrochlorofluorocarbons (HCFCs)	<input type="radio"/>	<input type="text"/>
Chlorofluorocarbons (CFCs)	<input type="radio"/>	<input type="text"/>
Halons	<input type="radio"/>	<input type="text"/>
Arsenic and compounds (as As)	<input type="radio"/>	<input type="text"/>
Cadmium and compounds (as Cd)	<input type="radio"/>	<input type="text"/>
Chromium and compounds (as Cr)	<input type="radio"/>	<input type="text"/>
Copper and compounds (as Cu)	<input type="radio"/>	<input type="text"/>
Mercury and compounds (as Hg)	<input type="radio"/>	<input type="text"/>
Nickel and compounds (as Ni)	<input type="radio"/>	<input type="text"/>
Lead and compounds (as Pb)	<input type="radio"/>	<input type="text"/>
Zinc and compounds (as Zn)	<input type="radio"/>	<input type="text"/>
Alachlor	<input type="radio"/>	<input type="text"/>
Aldrin	<input type="radio"/>	<input type="text"/>
Atrazine	<input type="radio"/>	<input type="text"/>
Chlordane	<input type="radio"/>	<input type="text"/>
Chlordecone	<input type="radio"/>	<input type="text"/>
Chlorfenvinphos	<input type="radio"/>	<input type="text"/>
Chloro-alkanes, C10-C13	<input type="radio"/>	<input type="text"/>
Chlorpyrifos	<input type="radio"/>	<input type="text"/>
DDT	<input type="radio"/>	<input type="text"/>
1,2-dichloroethane (EDC)	<input type="radio"/>	<input type="text"/>
Dichloromethane (DCM)	<input type="radio"/>	<input type="text"/>
Dieldrin	<input type="radio"/>	<input type="text"/>

Diuron	<input type="radio"/>	<input type="text"/>
Endosulphan	<input type="radio"/>	<input type="text"/>
Endrin	<input type="radio"/>	<input type="text"/>
Halogenated organic compounds (as AOX)	<input type="radio"/>	<input type="text"/>
Heptachlor	<input type="radio"/>	<input type="text"/>
Hexachlorobenzene (HCB)	<input type="radio"/>	<input type="text"/>
Hexachlorobutadiene (HCBD)	<input type="radio"/>	<input type="text"/>
1,2,3,4,5,6-hexachlorocyclohexane(HCH)	<input type="radio"/>	<input type="text"/>
Lindane	<input type="radio"/>	<input type="text"/>
Mirex	<input type="radio"/>	<input type="text"/>
PCDD + PCDF (dioxins + furans) (as Teq)	<input type="radio"/>	<input type="text"/>
Pentachlorobenzene	<input type="radio"/>	<input type="text"/>
Pentachlorophenol (PCP)	<input type="radio"/>	<input type="text"/>
Polychlorinated biphenyls (PCBs)	<input type="radio"/>	<input type="text"/>
Simazine	<input type="radio"/>	<input type="text"/>
Tetrachloroethylene (PER)	<input type="radio"/>	<input type="text"/>
Tetrachloromethane (TCM)	<input type="radio"/>	<input type="text"/>
Trichlorobenzenes (TCBs) (all isomers)	<input type="radio"/>	<input type="text"/>
1,1,1-trichloroethane	<input type="radio"/>	<input type="text"/>
1,1,2,2-tetrachloroethane	<input type="radio"/>	<input type="text"/>
Trichloroethylene	<input type="radio"/>	<input type="text"/>
Trichloromethane	<input type="radio"/>	<input type="text"/>
Toxaphene	<input type="radio"/>	<input type="text"/>
Vinyl chloride	<input type="radio"/>	<input type="text"/>
Anthracene	<input type="radio"/>	<input type="text"/>
Benzene	<input type="radio"/>	<input type="text"/>
Brominated diphenylethers (PBDE)	<input type="radio"/>	<input type="text"/>
Nonylphenol and Nonylphenol ethoxylates (NP/NPEs)	<input type="radio"/>	<input type="text"/>

Ethyl benzene	<input type="radio"/>	<input type="text"/>
Ethylene oxide	<input type="radio"/>	<input type="text"/>
Isoproturon	<input type="radio"/>	<input type="text"/>
Naphthalene	<input type="radio"/>	<input type="text"/>
Organotin compounds (as total Sn)	<input type="radio"/>	<input type="text"/>
Di-(2-ethyl hexyl) phthalate (DEHP)	<input type="radio"/>	<input type="text"/>
Phenols (as total C)	<input type="radio"/>	<input type="text"/>
Polycyclic aromatic hydrocarbons (PAHs)	<input type="radio"/>	<input type="text"/>
Toluene	<input type="radio"/>	<input type="text"/>
Tributyltin and compounds	<input type="radio"/>	<input type="text"/>
Triphenyltin and compounds	<input type="radio"/>	<input type="text"/>
Total organic carbon (TOC) (as total C or COD/3)	<input type="radio"/>	<input type="text"/>
Trifluralin	<input type="radio"/>	<input type="text"/>
Xylenes	<input type="radio"/>	<input type="text"/>
Chlorides	<input type="radio"/>	<input type="text"/>
Chlorine and inorganic compounds	<input type="radio"/>	<input type="text"/>
Asbestos	<input type="radio"/>	<input type="text"/>
Cyanides (as total CN)	<input type="radio"/>	<input type="text"/>
Fluorides (as total F)	<input type="radio"/>	<input type="text"/>
Fluorine and inorganic compounds (as HF)	<input type="radio"/>	<input type="text"/>
Hydrogen cyanide (HCN)	<input type="radio"/>	<input type="text"/>
Particulate matter (PM10)	<input type="radio"/>	<input type="text"/>
Octylphenols and Octylphenol ethoxylates	<input type="radio"/>	<input type="text"/>
Fluoranthene	<input type="radio"/>	<input type="text"/>
Isodrin	<input type="radio"/>	<input type="text"/>
Hexabromobiphenyl	<input type="radio"/>	<input type="text"/>
Benzo(g,h,i)perylene	<input type="radio"/>	<input type="text"/>

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

Not at all important



Extremely important

Don't know

36. 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.

37. 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?

- | | | | | | | | | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|---------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Over 100% increase | 76-100% increase | 51-75% increase | 26%-50% increase | 5-25% increase | +/-5% little or no impact | 5-25% decrease | 26%-50% decrease | 51-75% decrease | 76-100% decrease | Over 100% decrease | Do not know |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

38. 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?

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

- Yes
- No
- Don't know

Comments

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

- Yes
- No
- Don't know

Comments

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

Page description:

Data on the composition of waste transfers and data on resource consumption (e.g. energy, water and raw materials) are currently not included or only partly included in the E-PRTR. They could be an important contribution to understanding progress towards realising circular economy objectives. The addition of contextual data, e.g. energy use, could also increase the usefulness of the E-PRTR in supporting the assessment of the environmental performance and the carbon efficiency of different industrial activities. If such data were reported to competent authorities and submitted to the E-PRTR, some may be claimed as confidential business information (CBI) and excluded from public data products.

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

Not at all important

Extremely important

Energy consumption

Don't know

Energy recovery / reuse

Don't know

Raw materials consumption

Don't know

Water consumption

Don't know

Percentage of water reused

Don't know

Composition of waste transfers

Don't know

Other contextual information

Don't know

Comments

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

No impact

Significant impact

Energy consumption

NA / Don't know

Energy recovery / reuse

NA / Don't know

Raw materials consumption

NA / Don't know

Water consumption

NA / Don't know

Percentage of water reused

NA / Don't know

Composition of waste transfers

NA / Don't know

Other contextual information (if you specified any in the preceding question)

NA / Don't know

Comments

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

No impact

Significant impact

Energy consumption

NA / Don't know

Energy recovery / reuse

NA / Don't know

Raw materials consumption

NA / Don't know

Water consumption

NA / Don't know

Percentage of water reused

NA / Don't know

Composition of waste transfers

NA / Don't know

Other contextual information (if you specified any in the preceding question)

NA / Don't know

Comments

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

Not at all important

Extremely important

Don't know

Comments

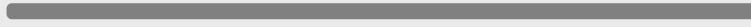
45. Which individual HFCs, HCFCs, CFCs and PFCs compounds / sub-groups should be reported?

Page description:

Releases are quantified and reported to the E-PRTR by individual facilities using a bottom-up approach. For some current, and proposed, E-PRTR activities e.g. intensive livestock rearing, the bottom-up approach requires a large number of facilities to report. Such activities are often homogenous and are carried out by many small facilities, but the aggregated releases are significant. Instead, a top-down approach could be considered where relevant national statistics or sector-specific statistics and relevant emission factors are used for selected activities, pollutants and/or sizes of facilities to derive reasonable estimates of typical releases. This could ensure a proportionate reporting burden reflecting the size and environmental impact of certain facilities and/or activities.

46. 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.

Not at all important



Extremely important

Don't know

Comments

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

48. 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.

No change

Significant decrease

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)

NA / Don't know

Near real-time reporting of CEMS data for certain activities

NA / Don't know

Clearer guidance on what pollutants should be reported and what quantification method to use

NA / Don't know

Guidance and tools to assist the competent authorities with the review process (e.g. earlier flagging of anomalies and typical discrepancies)

NA / Don't know

Improved submission system to EEA, to receive feedback, and to resolve follow-up questions quicker

NA / Don't know

Other approaches

NA / Don't know

Comments

49. 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)

Near real-time reporting of CEMS data for certain activities

Clearer guidance on what pollutants should be reported and what quantification method to use

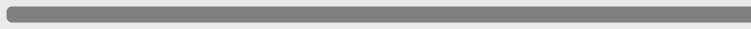
Guidance and tools to assist the competent authorities with the review process (e.g. earlier flagging of anomalies and typical discrepancies)

Improved submission system to EEA, to receive feedback, and to resolve follow-up questions quicker

Other approaches specified in the preceding question.

50. 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.

No impact



Significant impact

Not Applicable/Don't know

Comments

Problem area 5: Access to E-PRTR information

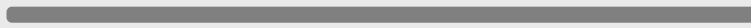
Page description:

There is a need to further promote participation in environmental decision making by improving the ease of public access to E-PRTR information and the utility of that information for users.

Operators reporting more than one type of activity. Alignment between the E-PRTR and the IED can also be problematic where more than one E-PRTR Annex I activity is carried out by an operator. In these cases, the facility reports the total aggregated releases to the E-PRTR rather than the activity-specific releases. This precludes the separation of releases needed for an IED activity-specific assessment.

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

Not at all important



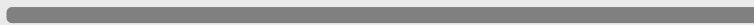
Extremely important

Not Applicable/Don't know

Comments

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

No impact



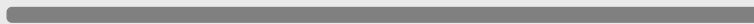
Significant impact

Not Applicable/Don't know

Comments

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

Very easy



Very difficult

Don't know

Comments

54. 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.

Not at all useful

Very useful

To understand environmental concerns in your local environment

To increase transparency in environmental information and decision making

To increase engagement of the public in environmental information and decision making

To inform policy development (national or EU)

To increase the accountability of operators of polluting activities and provide an incentive to improve environmental performance

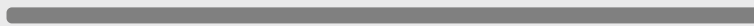
To prevent and/or reduce environmental pollution

To achieve the European Green Deal goals

Comments

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

Not at all important



Extremely important

Don't know

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

Page description:

Article 8 of the E-PRTR Regulation fulfils the Kiev Protocol requirement to include information on releases from diffuse sources with a sufficient level of geographical disaggregation. The Kiev Protocol defines “diffuse sources” as the “many smaller or scattered sources from which pollutants may be released to land, air or water, whose combined impact on those media may be significant and for which it is impractical to collect reports from each individual source”. This definition covers, for example, road transport, shipping, aviation, agriculture, fuel distribution, domestic heating and facilities that are below PRTR capacity thresholds.

The previous limited E-PRTR exercises to estimate releases to [air](#) and [water](#) from diffuse sources are now substantially out of date. More current data on releases from diffuse sources would provide a more holistic and comprehensive quantification of releases from EU anthropogenic sources to set releases from EU (agro-)industrial sources in context.

Future data could be compiled by Member States providing information specific to their country; by new Commission studies; and/or by utilising spatially resolved information delivered by other reporting mechanisms, e.g. the National Emissions Ceilings Directive (NECD, 2016/2284/EU), air emissions inventories or Water Information System for Europe (WISE) data under the Water Framework Directive (2000/60/EC).

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

- Yes
- No

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

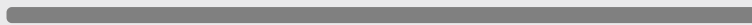
- Address more sources (Please explain)
- Improved spatial resolution
- Use methodologies specific to individual countries
- More recent estimates
- Estimates at regular intervals to develop a time series
- Other (Please explain)

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

- Member States report, at regular intervals, using methods that best capture the situation in their country
- Member States report, at regular intervals, using a standardised template and standardised emission factors, at regular intervals
- Dedicated Commission studies (of the type already undertaken), at regular intervals
- Use estimates from other reporting requirements
- Other (Please explain)

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

Not at all important



Extremely
important

Don't know

Comments

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

General

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