Statement, Christian SCHAIBLE (European Environmental Bureau)

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Agenda 3 (b): Technical resources and subregional and national activities

The EEB would like to share with you about key findings made from a research on various European Union online access portals on industrial activities, including the Norwegian PRTR. The report named “Burning: the Evidence. How European Countries Share industrial Pollution Permit Information Online” will be provided to the UNECE website and launched next week through the EEB website. It examines how effectively certain European countries are making information about industrial pollution available to the public online. It examines and assesses the various websites used to share permitting and emissions information about facilities regulated by the EU’s Industrial Emissions Directive (IED).

Release information was not the main information we have been checking for, it is rather about other type of information (permits, compliance reports, search functions, enhanced public participation options, user-friendliness). All is based on a samples on Large Combustion Plants based on common assessment criteria. Therefore it is not reflecting the full picture e.g. for Waste incineration some national systems, such as in Czech Republic, are much better developed.

Whilst we did not deep-dive into the National/regional PRTR systems, there is a link to these and similar issue faced with PRTR implementation: (same requirements but different approaches at regional / sub-regional level). The report highlights possible good practice approaches with some concrete recommendations on how existing industrial pollution webportals could be improved (without reinventing the wheel or even amending the protocol), so it is rather about implementation and sharing good practice.

This is the first version and we will visualize the findings on interactive maps. We look forward for comments and reaction from the parties because we want to use it as a tool to track progress in access to information portals on industrial activities.

We conclude that the following main recommendations could be made:

The EEB calls on implementation of PRTR and access to information tools on industrial activities that are similar to the Norwegian PRTR and the Irish industrial production webportal, which are considered best practice examples from the EU tools assessed. The US EPA Air Markets Program Data (AMPD) also shows how effective online reporting of monitoring data on industrial installations can be done.

Key recommendations

- National portals should gather permitting information from all regions or with detailed links to regional permitting information
- The Irish EPA’s search function should serve as best practice for other websites
- Permits should be consolidated into a single document
- Compliance and inspection reports should be published together with permitting information on a single plant-specific information page where as much relevant information as exists is gathered. The Irish, Norwegian and Walloon (Belgium) websites offer useful examples of best practice. In regards to inspection reports the Irish,
Norwegian and regional model of the French PACA region are considered as best practice.

 Authorities should make an effort to proactively share information ahead of decisions to issue, update or renew permits. Information about upcoming decisions such as permit reviews should be clearly displayed. Authorities should make greater efforts to proactively share such information e.g. offering automatic alerts by email, RSS feeds or other useful service. Current best practice: Ireland & Denmark.

 PRTRs should be improved and enhanced and linked to additional environmental information. The Norwegian model is a suitable model in this respect: PRTRs should be adapted to align to the Norwegian model and displayed on plant-specific pages with the following additional elements: latest consolidated permit in force, latest inspection and compliance report(s), release data combined with information on flow rates to air and water, production outputs data, permit emission limits integrated into the data reporting, whether a derogation for best available techniques / practice has been submitted/filed/approved. Continuous monitoring data should also be made available online, good practice is the US EPA Air Markets (AMPD) model.

 A harmonised IED Electronic Permit Template (EPT) and other common documents should be introduced at regional level:

 A harmonisation of reporting formats for key documents (at the very least the permits but also potentially inspection reports, compliance reports and others) would enable effective electronic integration into national and regional 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.

 This is for parties subject to the EU Environmental protection acquis: An Electronic Permit Template (EPT) would remove administrative burdens linked to language barriers and wider (EU) level reporting. The required basic elements of the permit conditions under the IED permit would need to be reported in the EPT (e.g. permit ELVs applied for various pollutants with averaging periods indicated). The EU-level PRTR system could then automatically extract the relevant data fields for reporting purposes. Such a system would allow: Stakeholders acting at national or EU level to get easy access to information on equivalent industrial activities, allowing better benchmarking of environmental performance. Hotspots to be identified for improvement opportunities. Better use of information available for other purposes e.g. BAT uptake, 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. Direct reporting based on streamlining of various reporting obligations through a harmonised standard could help automated IT reporting systems to properly function.