Format for the Protocol on Pollutant Release and Transfer Registers Implementation Report in accordance with Decision I/5 (ECE/MP.PRTR/2010/2/Add.1)

**CERTIFICATION SHEET**

**The following report is submitted on behalf of**

**the Czech Republic**

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[name of the Party or the Signatory] in accordance with decision I/5**

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| Name of officer responsible for submitting the national report: | Evžen Doležal  Director of the Department of EIA and Integrated Prevention |
| Signature: |  |
| Date: | 15. 12. 2016 |

**IMPLEMENTATION REPORT**

**Please provide the following details on the origin of this report.**

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| *Party/Signatory* | *The Czech Republic* |
| *NATIONAL FOCAL POINT* | |
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| *Designated competent authority responsible for managing the national or regional register (if different):* |  |
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| **Provide a brief description of the process by which this report has been prepared, including information on which types of public authorities were consulted or contributed to its preparation, how the public was consulted and how the outcome of the public consultation was taken into account and on the material which was used as a basis for preparing the report.** |
| *Answer:*  The issue of the Integrated Pollution Register / Integrovaný registr znečišťování životního prostředí (the official name of the Czech/national PRTR – abbreviated as IRZ) is fully under the responsibility of the Ministry of the Environment of the Czech Republic (the MoE or the Ministry) and for that reason the Ministry was the primary author of this report. No organisational change is expected in this matter in the future. The Ministry consulted some parts with other relevant organisations, including:   * CENIA, the Czech Environmental Information Agency, which is entrusted by the Ministry with the actual operation of the national PRTR; * Czech Environmental Inspectorate (CEI), which is the inspection body for the issues of the national PRTR; * Czech Hydrometeorological Institute (CHMI); * Other expert bodies of the Ministry.   The report then went through an objections procedure throughout the Ministry and was subsequently approved by the management of the Ministry.  The process of drafting the report was as follows:   1. The draft report was created by the MoE department of environmental impact assessment and integrated prevention (July 2016). 2. The report was consulted with CENIA, CEI and CHMI (July-August 2016). 3. The draft report was published on the website of the national PRTR (<http://www.irz.cz/>, <http://www.prtr.cz/>). In this way, primarily the general public was addressed to get acquainted with the draft report and to raise any suggestions and comments, which would be taken into account in the final version (September-October 2016). 4. The draft report was consulted in the Working Group of the national PRTR, established as part of the planned legislation changes concerning the national PRTR (representatives of non-governmental organisations, industrial associations, business entities and State administration) (July-October 2016). 5. Internal objections procedure within the MoE (November 2016). 6. Approval by the MoE management meeting (December 2016). 7. Translation of the report into English (December 2016). 8. Submitting the report according to the approved timetable (i.e. by 15 December 2016).   The basic materials that were used in preparing the Report included in particular the legislation that directly concerns the national PRTR (see below) or selected related regulations. In the description of the reporting process, a use was made of the prescribed procedures allowing the use of the services of the Integrated System of Reporting Obligations in the field of the environment (ISPOP). Comments or suggestions from the above mentioned and addressed entities were taken into account and integrated where appropriate. The report also took into account the long-term experience with operation of the information system of the national PRTR and the experience of reporters. |

**Articles 3, 4 and 5**

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| **List legislative, regulatory and other measures that implement the general provisions in articles 3 (general provisions), 4 (core elements of a pollutant release and transfer register system (PRTR)) and 5 (design and structure).** |
| In particular, describe: |
| (a) With respect to **article 3**, **paragraph 1**, measures taken to ensure the implementation of the provisions of the Protocol, including enforcement measures; |
| (b) With respect to **article 3, paragraph 2**, measures taken to introduce a more extensive or more publicly accessible PRTR than required by the Protocol**;** |
| (c) With respect to **article 3, paragraph 3**, measures taken to require that employees of a facility and members of the public who report a violation by a facility of national laws implementing this Protocol to public authorities are not penalized, persecuted or harassed for their actions in reporting the violation; |
| (d) With respect to **article 3, paragraph 5**, whether the PRTR system has been integrated into other reporting mechanisms and, if such integration has been undertaken, into which systems. Did such integration lead to elimination of duplicative reporting? Were any special challenges encountered or overcome in undertaking the integration, and how? |
| (e) With respect to **article 5,** **paragraph 1**, how releases and transfers can be searched and identified according to the parameters listed in subparagraphs (a) to (f); |
| (f) With respect to **article 5,** **paragraph 4,** provide the Universal Resource Locator (url) or Internet address where the register can be continuously and immediately accessed, or other electronic means with equivalent effect; |
| (g) With respect to **article 5,** **paragraphs 5 and 6**, provide information on links from the Party’s register to relevant existing, publicly accessible databases on subject matters related to environmental protection, if any, and a link to PRTRs of other Parties. |
| Answer:   1. The Protocol was signed on 21 May 2003 on behalf of the Czech Republic and the subsequent ratification process was completed on 12 August 2009. The Protocol was published in the collection of international treaties (chapter 42) under No 108/2009. Following the adoption of Regulation of the European Parliament and of the Council (EC) No 166/2006, which establishes the European pollutant release and transfer register (the E-PRTR Regulation), it was necessary to update the relevant national legislation accordingly. The result was Act No 25/2008 on the Integrated Pollution Register and on the Integrated System of Reporting Obligations in the field of the environment and amending certain acts, as amended (the IPR Act). The possible adoption of the Protocol was already reckoned with in the previous regulation that covered the issues of the national PRTR together with the issue of integrated prevention. It was Act No 76/2002 on integrated pollution prevention and control, on the integrated pollution register and on amendments to certain acts (the Integrated Prevention Act), as amended at that time. The issue of the national PRTR was subsequently extracted and placed into a separate Act on the IPR.   By default, the IPR Act contains provisions relating to sanctions/administrative offences (specifically Sections 5 and 6). The sanction provisions concern operators, who fail to comply with the requirements of the IPR Act. The text of the relevant provisions is as follows:  *Section 5*  *(1) The operator referred to in Section 3 par. 1 commits an administrative offense by*  *a) not reporting the release or transfer of a pollutant or waste transfers pursuant to Section 3,*  *b) providing incorrect data when fulfilling the reporting duty referred to in Section 3, or*  *c) not keeping records of data for reporting in accordance with the requirements of a directly applicable European Community regulation.*  *(2) The operator referred to in Section 3 par. 2 commits an administrative offense by*  *a) not reporting the release or transfer of a pollutant or waste transfers pursuant to Section 3,*  *b) providing incorrect data when fulfilling the reporting duty referred to in Section 3, or*  *c) not keeping records of the data for reporting in accordance with the requirements of Section 3 par. 2.*  *(3) The administrative offence referred to in paragraph 1 or 2 shall be fined at up to CZK 500 000.*  *Section 6*  *(1) A legal entity is not liable for an administrative offence if it proves that it has exerted every effort, that it was possible to require, to prevent the breach of the legal obligation.*  *(2) In determining the amount of the fine for a legal entity, account shall be taken of the seriousness of the administrative offense, in particular, the way it was committed and its consequences, and the circumstances under which it was committed.*  *(3) The liability of the legal entity for the administrative offense shall cease, if the administrative authority does not commence proceedings on the offense within 1 year from the date it learnt about it, but not later than within 3 years from the date the offense was committed.*  *(4) Administrative offences under this Act are discussed by the Czech Environmental Inspectorate (hereinafter referred to as "the Inspectorate").*  *(5) The liability for acts carried out when running a business by a natural person or in direct connection with it shall be subject to the provisions of the Act on liability of legal entities and sanctions against them.*  *(6) The income from fines belongs in 50% to the budget of the municipality in which the activity of the operator is operated, and such income is earmarked for environmental protection, and in 50% it is the income of the State Environmental Fund of the Czech Republic.*  Another Act which governs the national PRTR issues is Government Order No 145/2008, laying down the list of pollutants and thresholds and the data required for the reporting into the Integrated Pollution Register, as amended (Government Order on IPR). In particular, this Order lays down the list of substances beyond the E-PRTR (see the following item) and also describes the data required for reporting (i.e. identification data of the organisation, the facility, coordinates, activity, etc.), which are based directly on Annex III to the E-PRTR Regulation, and additionally cover specific national requirements (e.g. in relation to the reporting of transfers of pollutants in waste). The Order was last updated by Government Order No 450/2011, amending Government Order No 145/2008, laying down the list of pollutants and thresholds and the information required for reporting into the Integrated Pollution Register. The amendments concerned the list of the substances in question – the number of the reported substances was reduced from the original 72 to the current 26 (substances that have never been used and/or produced in the Czech Republic - such as pesticides - were excluded).   1. Since its start, the scope of the national PRTR is wider than required by the Protocol or the E-PRTR Regulation. By default, transfers of the quantity of waste are monitored (which is required by the E-PRTR Regulation) as well as transfers of pollutants in waste. The national PRTR currently tracks a total of 26 substances in transfers in waste. Specifically, this concerns the following substances and the relevant threshold values:  |  |  |  |  | | --- | --- | --- | --- | | **Number** | **CAS Number** | **The reported pollutant** | **The threshold value for the transfer of pollutants in waste outside the facility (in kg/year)** | | 17 |  | Arsenic and compounds (as As) | 50 | | 18 |  | Cadmium and compounds (as Cd) | 5 | | 19 |  | Chromium and compounds (as Cr) 3 | 200 | | 20 |  | Copper and compounds (as Cu) | 500 | | 21 |  | Mercury and compounds (as Hg) | 5 | | 22 |  | Nickel and compounds (as Ni) | 500 | | 23 |  | Lead and compounds (as Pb) 3 | 50 | | 24 |  | Zinc and compounds (as Zn) | 1 000 | | 35 | 75-09-2 | Dichloromethan (DCM) | 100 | | 42 | 118-74-1 | Hexachlorobenzene (HCB) | 1 | | 47 |  | PCDD + PCDF (dioxins + furans) (as Teq) | 0.001 | | 50 | 1336-36-3 | Polychlorinated biphenyls (PCBs) | 1 | | 52 | 127-18-4 | Tetrachloroethylene (PER) | 1 000 | | 58 | 67-66-3 | Trichloromethane | 1 000 | | 62 | 71-43-2 | Benzene | 2 000 (as BTEX) | | 68 | 91-20-3 | Naphthalene | 100 | | 70 | 117-81-7 | Di-(2-ethyl benzoic acid) phthalate (DEHP) | 100 | | 71 | 108-95-2 | Phenols (as total C) | 200 | | 72 |  | Polycyclic aromatic hydrocarbons (PAH) | 50 | | 73 | 108-88-3 | Toluene | 2 000 (as BTEX) | | 78 | 1330-20-7 | Xylenes | 2 000 (as BTEX) | | 81 | 1332-21-4 | Asbestos | 10 | | 82 |  | Cyanides (as total CN) | 500 | | 83 |  | Fluorides (as total F) | 10 000 | | 92 | 100-42-5 | Styrene | 10 000 | | 93 | 50-00-0 | Formaldehyde | 10 000 |   Also, since the beginning of the national PRTR (i.e. since 2004) the controlled substances in the releases to air additionally include styrene and formaldehyde (reporting thresholds 100 kg/year and 50 kg/year respectively).  In accordance with the E-PRTR, the following substances are monitored in addition to the Protocol:   |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Number** | **CAS Number** | **Pollutant** | **Threshold values for releases (in kg/year)** | | | | **into air** | **into water** | **into land** | | 87 | 1806-26-4 | Octylphenols and Octylphenol Ethoxylates |  | 1 |  | | 88 | 206-44-0 | Fluoranthene |  | 1 |  | | 89 | 465-73-6 | Isodrin |  | 1 |  | | 90 | 36355-1-8 | Hexabromobifenyl | 0.1 | 0.1 | 0.1 | | 91 | 191-24-2 | Benzo(g, h, i)perylen |  | 1 |  |   Also the thresholds were modified for certain substances. As in the previous case, the adjustments comply with the E-PRTR. This concerns the following substances (changes against the Protocol are highlighted in bold):   |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Number** | **CAS Number** | **Pollutant** | **Threshold values for releases (in kg/year)** | | | | **into air** | **into water** | **into land** | | 47 |  | PCDD + PCDF (dioxins + furans) (as Teq) | **0.0001** | **0.0001** | **0.0001** | | 52 | 127-18-4 | Tetrachloroethylene (PER) | 2 000 | **10** |  | | 53 | 56-23-5 | Tetrachloromethane (TCM) | 100 | **1** |  | | 54 | 12002-48-1 | Trichlorobenzenes (TCB) (all isomers) | 10 | **1** |  | | 57 | 79-01-6 | Trichloroethylene | 2 000 | **10** |  | | 58 | 67-66-3 | Trichloromethane | 500 | **10** |  |   A significant feature of the national PRTR is that it is not confined to the activities defined in the Protocol or in the E-PRTR Regulation but the group of reporters is much wider. However, an amendment to the IPR Act was adopted in 2016, specifying the definition in more detail and thereby limiting the range of the bodies concerned (see below for more). The first reports according to the amended IPR Act will be made for 2016 (i.e. by 31 March 2017).   1. Any complaint that relates to the national PRTR may be submitted by the body concerned to the Czech Environmental Inspectorate (CEI) whose duty is to act upon it. According to Section 8 of the IPR Act, CEI is the inspection authority in relation to the national PRTR and also decides on administrative offences according to Section 5 of the Act.   It is secured that the complaint pursuant to Section 42 of the Administrative Procedure Code (Act No 500/2004) received by the CEI is not, whether submitted by a natural person or a legal entity, part of the file which is available for inspection by a party to the proceedings, against which the complaint was lodged (protection of the identity of the person who filed the complaint). The complaint can be made accessible only in accordance with information laws (No 123/1998, No 106/1999), where such information can be made available to third parties in accordance with those laws only if the person who filed the complaint grants prior written consent with providing such information. This procedure is anchored in general in an internal staff regulation, which is the Methodological Guideline of the CEI for dealing with complaints and petitions (Art. IV par. 8, and Art. X). The identity of the notifier (considered to be the complainant) is not communicated to the inspected/ sanctioned entity. "Complaints" are part of a separate file, i.e. they are not included in the file with the inspection findings or in the file with the subsequent administrative proceedings.  The Ministry is also ready to deal with any complaint and either subsequently pass it to the CEI, or take the necessary steps itself. In the event that an employee affected this way turns to the Ministry, the Ministry will take the appropriate steps. It must be stressed that the MoE (or CEI) have not encountered to date a situation which is the subject of Art. 3 par. 3 of the Protocol.  In the case of injustice there is also the possibility to turn to the Ombudsman who protects persons against acts of authorities and other institutions, if such action is contrary to the law, does not correspond to the principles of democracy, the rule of law and good governance, or if the authorities are idle.  The notification of infringement is also newly enshrined for civil service employees (i.e. pursuant to Act No 234/2014 on civil service, as amended - Section 205 letter d)) in Government Order No 145/2015 on measures related to notifications of suspected infringements of the Staff Regulations. According to that regulation, a civil servant who notifies the suspected infringement by a senior employee, civil servant, another employee or a person in service under another law, committed in performing the civil service, work or public functions or in connection with that pursuant to the regulation or while proceeding according to another regulation, even anonymously, may not be affected, disadvantaged or exposed to coercion in connection with the infringement. However, due to certain shortcomings of the regulation (e.g. the fact that it only applies to employees who fall under the Civil Service Act), a separate bill is currently being prepared to deal with this issue in a comprehensive way.  (d) The Ministry takes gradual steps that will lead to a comprehensive integration of the reporting obligations and to elimination of duplicate forms of reporting. An important first step was the creation of the Integrated System of Reporting Obligations in the field of the environment (ISPOP-<https://www.ispop.cz/>), which has been in operation since 2010 (i.e. the first reporting was for 2009). The ISPOP in general can receive and process selected reports (reporting obligations) from the field of the environment in the electronic format and distribute them to the relevant institutions of the public administration. ISPOP was established by the IPR Act (it is the same Act that governs the national PRTR). The sponsor of ISPOP and of the material content of the forms, i.e. of the reporting obligations, is the Ministry, and the technical operation and the design of the ISPOP application is ensured by CENIA, the Czech Environmental Information Agency. The supplier of the solutions is a private entity. ISPOP has enabled the computerisation of the reporting of selected agendas, relating to the environment. It uses interactive electronic forms in the PDF format (the technological solution Adobe LiveCycle ES). Reporters have a user account set up in the ISPOP, which allows them to manage the facilities, check the status of the submitted reports, to archive them, download the reporting forms with pre-filled data and, last but not least, to actually submit the forms.  The ISPOP system is supported by the portal Environmental Helpdesk-EnviHELP (<https://helpdesk.cenia.cz/>) which provides a comprehensive information support for the reporters and other users or the general public on environmental issues in general.  A complete elimination of duplicate reporting of (or rather of a duplication of certain data, not of the whole reports or reporting obligations) has not been achieved yet in the Czech Republic. This is mainly due to the different requirements of the legislation related to the various environmental compartments (both at the national and international level), and the definitions arising from it (e.g. facilities, installations, accountable quantity of release/ transfer, etc.). The solution of this matter, therefore, cannot be sought only in the technical aspect (indeed, the reporting is centralised), but especially in the mutual compatibility of the legislation concerned. The amendment and mutual harmonisation of those regulations is a long-term process, and also more demanding, and therefore more complicated than the technical solution of data collection, or data processing and presentation. These factors must be clearly borne in mind when creating or changing international legislation. In addition, it can be stated that the issue of the national PRTR is not, unlike some other environmental compartment areas (in particular, waste and air), the priority of the Ministry.  (e) The primary source of information about the reported releases and transfers is the national PRTR website — specifically, the search tool, which can be found under the following link - <http://portal.cenia.cz/irz/> (in Czech language only). The search can be easily accessed also from the home page of the national PRTR website. The search tool includes data from the reporting years 2004 to 2015. Due to the various legislative changes and inhomogeneity of the reported data in the course of the existence of the national PRTR, the search still cannot be carried out through a single query form. The new IS IPR, however, is planned to include substantial enhancements of the search (that is, including the use of a single search form for all kinds of releases/ transfers). The MoE seeks in general to continuously improve the search for data, which is dependent on the current availability of the necessary financial resources, more intensive cooperation of the bodies concerned and on the progress towards the sub-objectives of the "Development strategy for information and communications technologies in the Ministry of the Environment in the period 2016-2020" (in the area of data reporting, collecting, archiving, presentation, analysis, etc.). Without achieving those objectives it will not be possible to continue the development of the IS IPR.  *Translation of the image:*  ***Search in the releases and transfers of substances***  *Reporting year: 2014*  *Kind of release/ transfer: Releases to air; releases to water; releases to land; transfers in wastewater; transfers in waste*  *Type of release/ transfer: typical…*  *Quantity: Any…*  *Method of detection: C-calculation; M-measurement; E-estimate*  *Substance: Select the name of the substance and/or the CAS number of the substance*  *Reporter: …. as (name of organisation…)*  *E-PRTR activity: any…*  *NACE: select…*  *Location: the whole of the Czech Republic; address…; Region (select); district (select)*  *Group by: organisations and facilities…*  *Sort the releases/ transfers: ascendingly.. (WARNING: the sorting will be applied only if grouped by substances, and if only one kind of release/ transfer was selected.)*  *Search releases and transfers*  The search in the data can be carried out through selecting a wide range of criteria – in particular, the kind of release/ transfer, the specific pollutants, the activities of the facility, the name of the organization/ facility, or geographical location of the facility (the whole of the Czech Republic, a region, district, municipality). The solution used provides users with virtually unlimited options of creating their own ranking lists. A certain drawback of the current solution is the very limited possibility to export the found data (i.e., their easy use, e.g. in a spreadsheet or database). The Ministry is planning to optimise also this aspect of the search tool in the future.  The concept of processing the reported data at the full-Ministry level (i.e. including the data reported and processed by the Ministry’s organisations) remains a serious problem that has been discussed for a long time (over 6 years) and real results are still not present; this affects significantly also the agenda of the national PRTR. There was a project on the information system ("SIRIUS"), which was to deal with the processing, analysis and presentation of that data, but was never implemented. Currently, preparatory works on the new IPR system are underway, but it can be assumed that the system will be launched at the end of 2018 at the earliest. At present, this problem is clearly more restrictive for the national PRTR than any lack of financial resources.  In this context, we must not omit the possibilities offered by the national Geoportal INSPIRE (<http://geoportal.gov.cz/>) – the individual facilities can be traced also through a map. The desired layer can be chosen based on several main criteria (the reporting year, activity – E-PRTR, IPPC or NACE - <http://geoportal.gov.cz/web/guest/map?wmc=http%3A//geoportal.gov.cz/php/wmc/data/4facd2fd-91fc-4ce5-a159-2149c0a80138.wmc&wmcaction=overwrite>). A disadvantage of the Geoportal is the fact that it cannot provide online map data via web services for display on other websites, such as the website of the national PRTR. This functionality would significantly improve the options of presenting the data reported to the national PRTR.  The Ministry also provides to the public each year a Summary Report with selected data reported to the national PRTR (i.e. with aggregate data). The Summary Report is published primarily on the website of the national PRTR. Unlike in the past, it is now issued only in electronic form (i.e. in the PDF format with publication on the relevant websites) and an official version on a CD is no longer made. The Summary Report is available in the Czech language only.  (f) <http://portal.cenia.cz/irz/> (in Czech language only)  (g) The national PRTR (IPR) – <http://irz.cz/> (or <http://www.prtr.cz>) (in Czech language only).  Search in the national PRTR - <http://portal.cenia.cz/irz/> (in Czech language only).  The register of emissions and sources of air pollution (REZZO) – Czech Hydrometeorological Institute – <http://portal.chmi.cz/files/portal/docs/uoco/oez/embil/14embil/index_CZ.html> (in Czech language only).  Maps of air pollution – Czech Hydrometeorological Institute – <http://pr-asu.chmi.cz:8080/IskoPollutionMapView/faces/viewMapImages.xhtml> (in Czech and English).  The sources of pollution – Czech Hydrometeorological Institute – <http://portal.chmi.cz/files/portal/docs/uoco/web_generator/plants/index_CZ.html> (in Czech language only).  Waste management information system (WMIS) – CENIA, the Czech environmental information agency – <http://isoh.cenia.cz/groupisoh/> (in Czech language only).  Integrated System of Reporting Obligations in the field of the environment (ISPOP) – CENIA, the Czech environmental information agency – <https://www.ispop.cz/> (in Czech language only).  Information system of the integrated pollution prevention and control - IS IPPC – Ministry of the Environment – <http://www.mzp.cz/ippc>.  Polluters under the magnifying glass – a non-profit organisation Arnika <http://www.znecistovatele.cz/> (the source of information is the national PRTR; in Czech language only).  A national inventory of contaminated sites – CENIA, the Czech environmental information agency – <http://kontaminace.cenia.cz/> (in Czech and English).  Information system WATER – Ministry of Agriculture of the Czech Republic – <http://voda.gov.cz/portal/> (in Czech and English).  EIA information system – CENIA, the Czech environmental information agency – <http://portal.cenia.cz/eiasea/view/eia100_cr> (in Czech language only).  SEA information system – CENIA, the Czech environmental information agency – <http://portal.cenia.cz/eiasea/view/SEA100_koncepce> (in Czech language only). |

**Article 7**

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| **List legislative, regulatory and other measures that implement article 7 (reporting requirements).** |
| Describe or identify as appropriate: |
| (a) With respect to **paragraph 1**, whether the reporting requirements of  paragraph 1 (a) are required by the national system, or whether those of paragraph 1 (b) are required by the national system; |
| (b) With respect to **paragraphs 1, 2 and 5**, whether it is the owner of each individual facility that is required to fulfil the reporting requirements or whether it is the operator; |
| (c) With respect to **paragraph 1 and annex I**, any difference between the list of activities for which reporting is required under the Protocol, or their associated thresholds, and the list of activities and associated thresholds for which reporting is required under the national PRTR system; |
| (d) With respect to **paragraph 1 and annex II**, any difference between the list of pollutants for which reporting is required under the Protocol, or their associated thresholds, and the list of pollutants and associated thresholds for which reporting is required under the national PRTR system; |
| (e) With respect to **paragraph 3 and annex II**, whether for any particular pollutant or pollutants listed in annex II of the Protocol, the Party applies a type of threshold other than the one referred to in the responses to paragraph (a) above and, if so, why; |
| (f) With respect to **paragraph 4**, the competent authority designated to collect the information on releases of pollutants from diffuse sources specified in paragraphs 7 and 8; |
| (g) With respect to **paragraphs 5 and 6**, any differences between the scope of information to be provided by owners or operators under the Protocol and the information required under the national PRTR system, and whether the national system is based on pollutant-specific (paragraph 5 (d) (i)) or waste-specific (paragraph 5 (d) (ii)) reporting of transfers; |
| (h) With respect to **paragraphs 4 and 7**, where diffuse sources have been included in the register, which diffuse sources have been included and how these can be searched and identified by users, in an adequate spatial disaggregation; or where they have not been included, provide information on measures to initiate reporting on diffuse sources; |
| (i) With respect to **paragraph 8**, the types of methodology used to derive the information on diffuse sources. |
| Answer:   1. Yes. In the case of releases into the air, water and land, and transfers in waste water, the threshold values are completely consistent with Annex II to the Protocol (and also in accordance with the E-PRTR Regulation). The scope of the reporting obligation to the national PRTR is specifically set out in Section 3 par.1) and 2) of the IPR Act. The text of the relevant provisions is as follows:   *Section 3*  *(1) The operator referred to in Regulation of the European Parliament and of the Council (EC) No 166/2006 reports to the Ministry:*  *a) releases and transfers of pollutants according to the directly applicable legislation of the European Communities,*  *b) releases of pollutants exceeding their thresholds; the government sets out the list of pollutants and their thresholds in an order, and*  *c) transfers of pollutants exceeding their thresholds, in the waste outside of the facility, generated directly or in direct connection with the operation of the operated installations; the government sets out the list of pollutants and their threshold values in an order.*  *(2) The operator that is an individual entrepreneur or a legal person operating a facility which consists of one or more stationary technical*  *units operated at one site where an activity other than listed in Annex I to Regulation of the European Parliament and of the Council (EC) No 166/2006 is carried out,*  *or an activity with a lower capacity than is listed in that annex, reports the releases and transfers of pollutants pursuant to paragraph 1 and keeps records of the data for reporting in a way described in Article 5(5) of European Parliament and Council Regulation (EC) No 166/2006).*  *(3) The information required for reporting to the integrated pollution register is defined in a government order.*  The above wording of Section 3 par. 2 applied for the last time to reporting year 2015. A change has been made for the reporting for 2016 (the above mentioned amendment to the IPR Act) and the current text of Section 3 par. 2 is as follows:  *(2) The operator that is an individual entrepreneur or a legal person operating a facility which consists of one or more stationary technical units operated at one site where an activity referred to in the annex to this Act, with a set threshold for the capacity, is carried out reports to the Ministry the releases and transfers of pollutants and transfers of waste pursuant to paragraph 1.*  As can be seen, the most recent amendment to the IPR Act specified the reporting entities in terms of their activities.  (b) The reporter is the operator of the facility concerned (Section 3 of the IPR Act – see the previous point).  (c) As is evident from the provisions of Section 3 of the IPR Act (see above), the scope of the national PRTR is not limited to the facilities with the listed activities, but it also applies to other activities which should be reported for if basic prerequisites are fulfilled (the emergence of releases/ transfers from own activities, the existence of a stationary technical unit, a facility located in a well-defined location). On the other hand, the national PRTR meets the requirements of the E-PRTR Regulation. The selected wider scope of the national PRTR is fully in accordance with the requirements of the Protocol.  It is necessary to add that the concept of a "broad" national PRTR was, from reporting year 2016, described in Act No 255/2016, amending Act No 25/2008 on the integrated pollution register and on the integrated system of reporting obligations in the field of the environment and amending certain laws, as amended, and the obligation to report to the national PRTR will be limited to two specific groups – a group of facilities with the obligation to report to the E-PRTR and the second group operating one of the 232 selected activities (including the set threshold capacity, if any). Further information on this subject is provided in the point on Article 8, and the new wording of the definition of the group of reporters beyond the E-PRTR (i.e. Section 3, par. 2) is mentioned in point (a) above.  (d) See the answer to Article 3, 4 and 5 (b).  (e) Yes – see the answer to Article 3, 4 and 5 (b).  The primary reason for the selected changes is the proper performance of the duties referred to in the E-PRTR Regulation. In the above cases, E-PRTR applies stricter threshold values.  (f) The national PRTR is funded and managed by the Ministry of the Environment of the Czech Republic (<http://www.mzp.cz/>).  The national PRTR is operated by CENIA, the Czech environmental information agency (<http://www.cenia.cz/>).  Inspection activities are carried out by the Czech Environmental Inspectorate (<http://www.cizp.cz/>).  (g) See answers to Articles 3, 4 and 5.  (h) The national PRTR does not monitor directly the diffuse sources. The national PRTR provides links to information on diffuse sources. Information on selected types of diffuse sources is published on the website of the E-PRTR (<http://prtr.ec.europa.eu/>).  (i) The national PRTR does not monitor directly the diffuse sources. The national PRTR provides links to information on diffuse sources. Information on selected types of diffuse sources and on methodologies for their identification is published on the website of the E-PRTR (<http://prtr.ec.europa.eu/>). |

**Article 8**

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| **For each reporting cycle since the last national implementation report (or date of entry into force of the Protocol), please indicate:** |
| (a) The reporting year (the calendar year to which the reported information relates); |
| (b) The deadline(s) by which the owners or operators of facilities were required to report to the competent authority; |
| (c) The date by which the information was required to be publicly accessible on the register, having regard to the requirements of **article 8** (reporting cycle); |
| (d) Whether the various deadlines for reporting by facilities and for having the information publicly accessible on the register were met in practice; and if they were delayed, the reasons for this; |
| (e) Whether methods of electronic reporting were used to facilitate the incorporation of the information required in the national register, and if such methods were used, the proportion of electronic reporting by facilities and any software applications used to support such reporting. |
| *Answer:*  Reporting year 2013:   * The deadline for sending the report to the national PRTR by operators – 31 March 2014 (see par. 4 of Section 3 of the IPR Act). * The deadline for the publication of the data reported to the national PRTR – 30 September 2014 (see letter a), of Section 7 of the IPR Act). * The vast majority of the reporters concerned fulfil their obligations towards the national PRTR within the deadline. Reports are received also after the specified due date throughout the year. The Ministry allows the reporters to send more precise or supplemented (corrected) data. The reports can also be sent with a delay, but in such case the reporters commit one of the administrative offences specified in Section 5 of the IPR Act and so they expose themselves to sanctions by the Czech Environmental Inspectorate (CEI), which is the inspection authority according to Section 8 of the IPR Act. If that happens, the reporter is invited to correct the reported data by sending a so-called supplemented report which is uniquely paired in the system with the original (the so-called "proper”) report which contained erroneous information. In the case of a complete omission of the reporting obligation, the CEI will invite the reporter to send a delayed proper report and thus meet its obligations. It can be added that in many cases, the reporters themselves find that they erred, and without any prompting they send either the proper or the supplemented (correcting) report to the Integrated System of Reporting Obligations.   The data reported to the national PRTR for the previous calendar year are published by default by 30 September at the latest. So far, in the entire existence of the national PRTR, no fundamental problems appeared in the publication, which would prevent the fulfilment of the legal obligation (the publication is preceded by rechecks of the reported data on a test instance of the search tool located on the website of the national PRTR). In this context, it is possible to say that not always the publication takes place exactly on 30 September. If this day falls on a weekend, it is customary to publish the reported data with due advance.   * Since the inception of the national PRTR (i.e. from the reporting year 2004), reporting has been carried out exclusively electronically. In the past, a single-purpose application was used to fill in the reported data, and then the generated file was sent to the Ministry. At present (from the reporting year 2009), the reporting is based on the technology of PDF forms (solutions from Adobe), and an XML file is created on the background of those forms. The reporting is done via a central reporting point – the Integrated System of Reporting Obligations (ISPOP), in which every reporter/operator has their user account set up, accessible by default after entering the login name and password. Through that reporter's account, the reporter will download a pre-filled PDF form (a pre-requisite is the previous registration of the IPR/E-PRTR facility), where they will fill in the required data on transfers and releases (identification details of the facility and organisation do not need to be filled in and cannot be edited in the form - they are part of the registration) and the completed form is then sent to ISPOP, which accepts it, performs a formal check and processes it further. By default, free Adobe Reader software is used for filling in the report. After logging in to their accounts, the reporters can monitor the status of the submitted reports. This system is continually updated and developed. The forms are also updated for each year (but the ability to receive and process reports for previous reporting years is maintained). The ISPOP system is used not only for the needs of the national PRTR, but also of the other reporting obligations from the field of the environment (waste, air, water, packaging, etc.), which enables the centralisation of the reporting obligations and simplifies the reporting for the reporters. In the near future, this system should be followed up with a platform capable of processing the data reported, of performing data analysis, synthesis or presentation in a non-aggregated and aggregated form or of a comprehensive administration (it would be a full replacement of the already unsatisfactory IS IPR).   An important part is the publication of the current data standard (see letter c) of Section 7 of the IPR Act). The data standard (or its publication) enables the creation of a customised solution for reporting (as mentioned above – in the XML format). In general, this method of reporting is used by large companies or commercial software companies that incorporate the performance of the reporting obligation to the national PRTR into their internal information systems or into commercial software products. Therefore, the reporters may choose the solution provided by the Ministry for free, or create their own, which meets their individual requirements, or choose a commercial software product. The ratio between reporting through the PDF forms and the customised or commercial solutions is not known to the Ministry. However, for the Ministry the information is not important. It is important that, for the reporting to the national PRTR, the Ministry offers an entirely free, generally acceptable solution on the PDF platform, which is widespread in virtually every desktop computer (or a laptop, tablet or mobile phone), regardless of the operating system (PDF format is readable through the free Adobe Reader software).  Reporting year 2014:   * The deadline for sending the report to the national PRTR by operators – 31 March 2015 (see par. 4 of Section 3 of the IPR Act). * The deadline for the publication of the data reported to the national PRTR - 30 September 2015 (see letter a), of Section 7 of the IPR Act). * Other - see reporting year 2013.   Reporting year 2015:   * The deadline for sending the report to the national PRTR by operators – 31 March 2016 (see par. 4 of Section 3 of the IPR Act). * The deadline for the publication of the data reported to the national PRTR - 30 September 2016 (see letter a), of Section 7 of the IPR Act). * Other - see reporting year 2013.   The reporting deadlines and publication dates are not expected to change in the near future. Reporters are already accustomed to the set deadlines (they fulfil other duties linked to the issue of the environment on similar dates), same as the users of the data reported to the national PRTR. Therefore, also in 2016, the March deadline for reporting (i.e. by 31 March 2017) and the September deadline for the publication of data (i.e. by 30 September 2017) will apply.  On the other hand, the reporting for 2016 will be very different from the previous years mentioned above. The range of reporting entities that report beyond the requirements laid down in the E-PRTR Regulation will be limited – a group of activities has been identified, which should continue to be reported for to the national PRTR (so far, the reporting obligation according to Section 3 par. 2 of the IPR Act concerned also other activities or activities with a lower capacity than is set out in Annex I to the E-PRTR Regulation). Small adjustments will be also made to the reporting to the ISPOP. In both cases, this means a reduction of the administrative burden, in particular for small business entities, or the elimination of the facilities having a negligible share of the quantities of releases/transfers in the total reported quantity (such as the services sector) and, conversely, an orientation on the major polluters.  Also, the list of substances in transfers in waste is continuously revised, although they are not reported at the level of the E-PRTR at all. In this context, it should be noted that such revision includes harmonisation of the reported substances with other legislation or international commitments of the Czech Republic (currently it is for example the Stockholm Convention). Therefore, an extension of the list of substances reported in releases/ transfers is currently discussed.  The E-PRTR requirements have been, in accordance with the relevant Regulation, fulfilled since the reporting year 2007. |

**Article 9**

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| **Describe the legislative, regulatory and other measures ensuring the collection of data and the keeping of records, and establishing the types of methodologies used in gathering the information on releases and transfers, in accordance with article 9 (data collection and record-keeping).** |
| *Answer:*  The basic regulation laying down the duties of the entities concerned towards the national PRTR is Act No 25/2008 on the Integrated Pollution Register and on the integrated system of reporting obligations in the field of the environment and amending certain acts, as amended (the IPR Act). Specifically, it is Section 3. The second basic regulation is Regulation of the European Parliament and of the Council (EC) No 166/2006, concerning the establishment of a European pollutant release and transfer register (the E-PRTR Regulation). The reporters are therefore divided into two groups:   * Reporters who perform obligations laid down in the E-PRTR Regulation, and obligations beyond the scope of the E-PRTR Regulation (par. 1 of Section 3 of the IPR Act). * Reporters who fulfil obligations imposed by national legislation (par. 2 of Section 3 of the IPR Act) outside the E-PRTR.   Both of the above groups of reporters have the same duties towards the national PRTR - the same range of the data provided.  The national legislation does not concretely specify record keeping but it directly refers to (even in the case of reporters without the obligations laid down in the E-PRTR Regulation) the obligation of keeping the appropriate records in the E-PRTR Regulation. In the case of checks by the CEI the reporter must clearly demonstrate that the reported information is correct (see Section 5 par. 1) letter b) of the IPR Act) and that records of data are kept in accordance with the requirements laid down in the E-PRTR Regulation). Otherwise, the reporter gets exposed to a potential sanction by the CEI. |

**Article 10**

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| **Describe the rules, procedures and mechanisms ensuring the quality of the data contained in the national PRTR and what these revealed about the quality of data reported, having regard to the requirements of article 10 (quality assessment).** |
| *Answer:*  The quality, completeness, credibility and consistency of the reported data is checked in several stages.  Each reporter to the national PRTR must register in the ISPOP, and in the course of the registration must fill in the basic identification data about the organisation and facility (address, name, the activity of the facility, coordinates, activity, etc.). That information is then checked against verified data (the existence of the company, the location of the facility, etc.) by authorised CENIA personnel. Each facility then receives a unique identification number of the facility (IČP). This prevents duplication in the registrations of facilities, wrong address, etc. A change in some of the data provided in the registration process continues to be subject to a review and subsequent approval by CENIA. Some of the data may be changed by the reporters themselves. As mentioned above, selected data are checked against validated data. The source of the so-called reference data are the Basic Registers of State Administration (http://www.szrcr.cz/system-zr).  The second stage of checks is the formal check of the data filled in the reporting form. During the filling in of the data the reporter can use the online check – this review focuses particularly on the completeness of the provided data - whether all the compulsory reporting information is filled in and in the correct format (in some cases it is not allowed to fill in text instead of a number). The check also informs the reporter whether the filled-in quantity is over the limit for the corresponding substance or whether at least one release/ transfer is filled in. Selected shortcomings will not allow the reporter to send the report. Other shortcomings are notified to the reporter, but the report can be sent. A formal check will take place upon entering the ISPOP - the format of the report is validated against the appropriate data standard. That prevents any changes in the XML file, which allows the editing of data that cannot be edited in the PDF forms.  The next check focuses on the content of the report. In this context, it should be noted that the reporters are primarily responsible for the reported data and the IPR Act strictly requires the sending of correct data. The content check focuses on selected data - an increased emphasis is put on data of facilities with the E-PRTR activities (or with activities in Annex I to the Protocol). The content check is performed by the staff of CENIA, the Czech environmental information agency, on the basis of an approved methodology prepared each year by the Ministry. In addition to the facilities with the E-PRTR activities, the content review focuses on priority substances and outliers. If irregularities are detected (such as a significant increase or decrease in the reported amounts, a change of activity against the previous year, etc.) the reporter is contacted and asked to confirm the reported data or to send corrections in the form of a so-called supplemented report. Data published on the website of the national PRTR are continuously updated.  The content check is performed also beyond the approved methodology, which happens in particular in the case of searching the database for various purposes. The potential deficiencies identified this way are also tackled directly with the reporter. Some significant changes in the reported data are subject to approval by the Ministry. The reporters are enabled to submit supplemented reports not only for the current reporting year but also for the previous years. In the future it is planned to improve and speed up the content check through its automation. The potential ambiguities in the reported data are pointed out to the Ministry also by the public or, for example, non-profit organisations. In a similar way, the Ministry is addressed by the CHMI - if inconsistency of the national PRTR data against data from EMEP-CLRTAP is detected, communication takes place to determine whether it is necessary to contact the reporter with a question as to the accuracy of the reported data.  It can be added that the checks use support materials created by the European Environment Agency (EEA). It is in fact the next phase of the check, which can remove other, as yet undetected errors in the reported data.  If potentially incorrect data are discovered, the reporter is immediately contacted. The reporter either confirms the existence of erroneous data and then is asked to send a supplemented (correcting) report with the correct information or confirms the accuracy of the data originally sent. |

**Article 11**

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| **Describe the way(s) in which public access to the information contained in the register is facilitated, having regard to the requirements of article 11 (public access to information).** |
| *Answer:*  Data reported to the national PRTR are publicly available free of charge on the website of the national PRTR (<http://portal.cenia.cz/irz>). Data can be searched on the basis of many criteria (location, activity, release/transfer, substance, the facility has/does not have an E-PRTR activity, the name of the organization/facility, etc.), which offers a wide range of search options and generation of customised individual rankings. The search tool allows you to search data for the reporting years 2004 (the first reporting year for the national PRTR) to 2015 (data published on 30 September 2016). Also available are annually prepared Summary Reports, which provide selected data in an aggregated form in terms of various criteria ([http://irz.cz/node/24#zpravy](http://irz.cz/node/24" \l "zpravy)).  The Ministry, in cooperation with CENIA, also provides, on request, personalised outputs according to precisely defined requirements of the reporter, and in accordance with the relevant legislation.  The Ministry regularly prepares and publishes other information materials to support the reporting to the national PRTR (e.g. Manual for reporting to the national PRTR, Instructions for filling in the reporting forms, etc.) that are freely available in electronic form (PDF format) on the website of the national PRTR. The Ministry, in cooperation with CENIA, the Czech environmental information agency, also provides information through the Environmental Help Desk (EnviHELP - <https://helpdesk.cenia.cz/>), or by telephone or email (email addresses of the relevant staff are publicly available on the website of the national PRTR, MoE and CENIA).  In the past, some of the above materials were also available on CDs. The CDs were subsequently distributed to various organisations (e.g. regional authorities, industrial associations, etc.) or, on request, sent to anyone else. However, this practice has been abandoned mainly due to financial reasons (or because of cost optimisation) and all materials are available only in electronic form on the relevant websites in PDF format. |

**Article 12**

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| **Where any information on the register is kept confidential, give an indication of the types of information that may be withheld and the frequency with which it is withheld, having regard to the requirements of article 12 (confidentiality). Please provide comments on practical experience and challenges encountered with respect to dealing with confidentiality claims, in particular with respect to the requirements set out in paragraph 2.** |
| *Answer:*  So far, the reporters have not marked any information as confidential. The Ministry also does not intend to limit the access to the reported data in any way. If that should occur, the Czech Republic will follow the relevant legal provisions (set out in the Protocol or in the E-PRTR Regulation but also in the relevant national legislation). All data that the obligated entities report to the national PRTR and are not marked as confidential are publicly available (on the website of the national PRTR or on request). |

**Article 13**

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| **Describe the opportunities for public participation in the development of the national PRTR system, in accordance with article 13 (public participation in the development of national pollutant release and transfer registers), and any relevant experience with public participation in the development of the system.** |
| *Answer:*  The Ministry appreciates the feedback from the general public and from the reporters to the national PRTR. Based on experience of reporters with the process of reporting to the national PRTR, the ISPOP and reporting forms are updated, in particular to simplify the reporting process for the reporters.  Great emphasis has traditionally been put on data from the national PRTR by non-governmental organisations concerned with environmental protection. The Ministry cooperates with them and assists them within its capabilities – whether this is inviting them to working groups concerning the national PRTR (e.g., recently they were involved in the amendment of the IPR Act or the Government Order on the IPR) or providing them with aggregated data from the national PRTR. The general public has got used to having access to the data reported to the national PRTR and uses them to exert pressure on large nationwide or local polluters to reduce or limit releases and/or transfers. In many cases, that has actually happened and the involvement of the public and the media has led to positive changes. Also the reporters make efforts not to be mentioned publicly in the media in connection with the pollution. In this context, we can particularly mention Arnika, a non-profit organisation that analyses in detail annually the reported data and the subsequent publication receives a great public response. In 2015, it published its own web application that provides interesting options with regard to searching the database of the data reported to the national PRTR and the visualisation of such data (<http://www.znecistovatele.cz/>).  On the other hand, feedback from citizens is not too large, and also from the media which make use of the reported data more or less only at the time of their official publication (i.e. at the end of September and beginning of October). Contacts of the staff of the responsible Department of the Ministry are publicly available for receiving any suggestions – they are on the website of the national PRTR, as well as on the website of the Ministry, or the EnviHELP platform can also be used for contacting.  In general, the Ministry makes efforts to assess each relevant initiative and, on its basis, to improve access of the public or to simplify and improve the process of reporting. Thanks to the feedback, errors can be identified in the reporting of the entities and then their correction can be demanded, which clearly enhances the quality of the reported data.  The Ministry (or the Department of Environmental Impact Assessment and Integrated Prevention) has information about the gaps in improving communication with the public or in access of the public to the reported or published data, and will try to eliminate the vast majority of them through the forthcoming new IPR information system. |

**Article 14**

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| **Describe the review procedure established by law to which all individuals have access if they consider that their request for information has been ignored, wrongfully refused or otherwise not dealt with in accordance with the provisions of article 14 (access to justice), and any use made of it.** |
| *Answer:*  The relevant law relating to the issue of the national PRTR does not provide for any review procedure. As has been mentioned above, the data reported to the national PRTR are publicly available free of charge on the website of the national PRTR (<http://portal.cenia.cz/irz>). Also available are annually prepared Summary Reports, which provide selected data in an aggregated form in terms of various criteria (<http://irz.cz/node/24#zpravy>). The Ministry, in cooperation with CENIA, also provides, on request, personalised outputs according to precisely defined requirements of the reporters, and in accordance with the relevant legislation. Such requests are always settled without undue delay.  The Ministry regularly prepares and publishes more information materials to support the national PRTR reporting on the website of the national PRTR (<http://www.irz.cz/> or <http://www.prtr.cz/>). The MoE in collaboration with CENIA also provides information through the Environmental Helpdesk (EnviHELP - [https://helpdesk.cenia.cz/](https://helpdesk.cenia.cz/‎)) or via telephone or email. That option can be used by anyone.  So far, the Ministry has not met with complaints about not providing or denying information on the issue of the national PRTR.  In general, the issue of public access to environmental information is covered by a separate Act No 123/1998 on the right to information on the environment, as amended, and Act No 106/1999 on free access to information, as amended. |

**Article 15**

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| **Describe how the Party has promoted public awareness of its PRTR and provide detail, in accordance with article 15 (capacity-building), on:** |
| (a) Efforts to provide adequate capacity-building for and guidance to public authorities and bodies to assist them in carrying out their duties under the Protocol; |
| (b) Assistance and guidance to the public in accessing the national register and in understanding the use of the information contained in it. |
| *Answer:*   1. The national PRTR is primarily under the responsibility of the Ministry. A certain part of the work related to the operation of the national PRTR is entrusted to the Ministry-funded organisation CENIA, the Czech environmental information agency. The requested activities are exactly specified, and each year they are updated. It is therefore clearly specified, who has responsibility for what activity. There is also no duplication of activities related to the national PRTR. Support is also provided to the CEI, which carries out not only verification but also preventive activities. It is thus clear that the performance of obligations towards the national PRTR is highly centralised at the level of State administration, and therefore there is no need to carry out extensive information activities (as in the case of significant decentralisation), apart from CENIA and CEI, with which the Ministry is in permanent contact. The mutual communication is both formal and informal. The informal one is especially characterised by a higher degree of flexibility, which is for example important in the period when the reporting obligations to the E-PRTR are performed or immediately before the publication of the reported data. 2. Communication and cooperation with the public is very important for the Ministry. Contacts of the staff members of the Department that deals with he issue of the national PRTR, are posted on the website of the Ministry or on the website of the national PRTR or ISPOP. There is also an important platform for support (not only) of the reporters or users of data reported to the national PRTR - the Environmental Helpdesk (EnviHELP - <https://helpdesk.cenia.cz/>), which is a public portal that allows the applicant for information or for any other kind of support to enter questions or requests on environmental issues in general and then track the progress of addressing the entered query or request.   The Ministry also prepares and provides a variety of information materials that are continuously updated as needed. All documents are available free of charge on the website of the national PRTR or ISPOP (mostly in PDF format). An important position among these documents is held by the following two:   * The manual for reporting to the national PRTR (<http://irz.cz/sites/default/files/Prirucka%20IRZ%202015_08022016.pdf>) – this is a comprehensive document that describes everything related to the issue of reporting to the national PRTR – legislation, the process of reporting, practical examples, etc. The manual is now issued exclusively in electronic form, in the PDF format. * Summary Report [(http://irz.cz/node/24#zpravy](http://irz.cz/node/24" \l "zpravy)) – this is a publication that analyses data reported for the relevant reporting year. The reader will find aggregate outputs in the form of tables and charts with a corresponding commentary.   Representatives of the Ministry or CENIA also participate in various events (seminars, conferences, etc.) that expand the awareness of the national PRTR and of how to use the data contained in it. In the case of events organised by or involving CENIA, the primary purpose is usually to provide the reporters with news in reporting to the national PRTR through ISPOP for the coming reporting year.  It should be noted that the national PRTR website contains other useful information relating to individual pollutants, such as general information, their hazards to health and the environment and the methods of their measurement. This year, that information was largely updated.  Information on the national PRTR is also disseminated through texts in professional journals (e.g. the magazine Odpady (Wastes), or Odpadové fórum (the Waste Forum)).  The Ministry, in cooperation with CENIA, also provides, upon request, highly individualised exports of aggregated data for the needs of individuals (e.g., for university students), non-governmental organisations or State authorities.  The main source of information, which has already been mentioned several times above, is the website of the national PRTR (<http://www.irz.cz/> or <http://www.prtr.cz/>), which contain the information described above, as well as a search tool (<http://portal.cenia.cz/irz>), which lets you search the database with the data reported for 2004-2015. The search can be based on many criteria. Great emphasis is placed on the search by location of the facility (address, town, district, region, entire country), on the choice of the specific activity of the facility (activities of the E-PRTR, NACE), and on the selection of a particular type of release/ transfer and substance. The website of the national PRTR also offers a brief guide for the search tool (<http://irz.cz/sites/default/files/Postup_vyhledavani_strucne_IRZ_02112012.pdf>). |

**Article 16**

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| **Describe how the Party has cooperated and assisted other Parties and encouraged cooperation among relevant international organizations, as appropriate, in particular:** |
| (a) In international actions in support of the objectives of this Protocol, in accordance with **paragraph 1 (a)**; |
| (b) On the basis of mutual agreements between the Parties concerned, in implementing national systems in pursuance of this Protocol, in accordance with **paragraph 1 (b)**; |
| (c) In sharing information under this Protocol on releases and transfers within border areas, in accordance with **paragraph 1 (c)**; |
| (d) In sharing information under this Protocol concerning transfers among Parties, in accordance with **paragraph 1 (d)**; |
| (e) Through the provision of technical assistance to Parties that are developing countries and Parties with economies in transition in matters relating to this Protocol, in accordance with **paragraph 2 (c)**. |
| *Answer:*   1. The representatives of the Czech Republic participate in meetings and negotiations of the parties to the Protocol and of the relevant working groups. In this context, it is also possible to mention the participation in negotiations relating to the E-PRTR from the position of a Member State of the European Union. 2. As has already been stated in the answer to paragraph (a), the Czech Republic is directly involved in E-PRTR. At the meetings, experience with the national PRTRs is exchanged on a regular basis. Also the Czech Republic presents its system of reporting to the national PRTR, including specific differences compared to the Protocol or the E-PRTR. This year, there will be significant changes in the functioning of the national PRTR (more detail provided in the final answer to the last question), the changes have already been presented. 3. Data reported to the national PRTR are an important support source of data, for example in addressing cross-border problems with the quality of the environment. In particular, the issue of air pollution in the Ostrava district in the Moravian-Silesian Region is addressed on a continuous basis in cooperation with Poland. There is also an effort to link the mutually isolated data sources, but it encounters various problems, so for the time being this is done through reciprocal links to the websites belonging to the various information systems (e.g. EIA, IPPC, LCP etc.). 4. Data reported to the national PRTR are usually part of larger information materials, which, for example, applies to the above issue of polluted air in the Moravian-Silesian Region, or different reports for the needs of the Stockholm Convention, etc. To date, the Ministry has not received any individual requests from abroad for the national PRTR data. It can be assumed that the data reported to the E-PRTR by the Czech Republic are sufficient for foreign entities and if there is an international collaboration on a specific subject, it is presumed that data from the national PRTR will be supplied by the Czech party. In the case of such request, the Ministry is ready to provide the required information. 5. The Ministry is, to a limited extent, involved in the meetings and seminars which are primarily focused on technical assistance to developing countries or countries with transit economies (e.g. Kazakhstan). In this context, the Ministry is able to provide experience with reporting to the national PRTR which has been purely electronic since the beginning (from the first reporting year 2004). The experience concerns not only the reporting process itself, but also the manner of reporting, the centralisation of the reporting obligations, including the national specificity – communication with State administration via data boxes (a system somewhat similar to e-mail communication) – more information at <http://www.datoveschranky.info/> (in Czech language only).   On the other hand, it is important for the Ministry to gain experience with modern presentation of data, their processing, analysis, or the interconnection of separate systems (or reporting obligations). For that reason, participation in various events on that theme is very important and beneficial also for the representatives of the Czech Republic. In this context, we appreciate the new NRC (National Reference Centre) for industrial pollution established by the European Environment Agency (EEA). Although negotiations are held only once a year, it is still possible to obtain important information in advance, in particular on the issue of the E-PRTR, IPPC, LPC etc. at European level, and also experience is exchanged informally.  As regards international cooperation, we cannot omit the important role of the Czech Hydrometeorological Institute (CHMI) and CENIA. CENIA is the operator of ISPOP and ensures the technical side of reporting for the Ministry and is able to participate independently in sharing experience in this area. CHMI deals, among other things, with the issues of air and, hence, with the reporting obligations laid down in national legislation, as well as with implementing international requirements. Both CENIA and CHMI are directly involved in international projects. |

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| **Provide any further comments relevant to the Party’s implementation, or in the case of Signatories, preparation for implementation, of the Protocol. Parties and Signatories are invited to identify any challenges or obstacles encountered in setting up, gathering data for and filling in the register.** |
| *Answer:*  The biggest current problem is the outdated presentation layer of data reported to the national PRTR. Also the absence of an administrator interface is a factor that limits the comprehensive management of the reported data. The financial aspect doesn't seem to be the main factor for the impossibility to develop the web and admin interface. It is assumed that it will be possible to use grants provided by the European Union. The Ministry currently addresses the Ministry-wide Development Strategy of Information and Communications Technologies in the Ministry of the Environment in the years 2016-2020, which will also define goals in key topics that include a uniform treatment of the reported data (i.e. not only to the national PRTR), which to a certain extent affects the work on the actual modernisation of the IPR information system. We perceive the obsolescence of the web presentation and also of the above mentioned limited management of data as a fundamental problem in relation to access (not only) of the public to environmental information. In addition to the web presentation, also searching the database of the national PRTR, automation of checks of the reported data, or extending the possibility of providing non-aggregated data, including in the area of open data, should be also improved.  Certain problems are still generated by the unclear specification or definition of releases to land. This group is the least reported type of releases or transfers. In recent years, such releases have not been reported at all or only very sporadically.  The actual system of reporting data to the national PRTR (and other environmental agendas) through ISPOP continues to work without major problems. Nevertheless, it is continuously updated and improved based on legislative changes and comments from users (reporters, State Administration). This year, the reporting should be simplified and so the related administrative burden should be reduced on the part of the State administration and of the reporters. The development of ISPOP is currently secured in all respects (including the financial) for several years ahead.  On 1 September 2016, an amendment of the IPR Act took effect, which should significantly reduce the burden on the side of the reporting bodies (the amendment has been mentioned above several times in varying degrees of detail). In that amendment, the Ministry focused more on the significant reporters. The amendment consists in eliminating a particular spectrum of activities that are not significant in terms of the target of the national PRTR (e.g. services). We add that this amendment does not alter in any way the obligations of the Czech Republic (or of reporters) under the E-PRTR Regulation or the Protocol. It limits the group of reporters who operate other activity or an activity with a lower capacity than is given in Annex I to the E-PRTR Regulation.  Another conspicuous gap is the inconsistency between related regulations. Differences are, for example, between the list of activities in the E-PRTR and in the directive on industrial emissions, or between the list of substances in the annexes to the Stockholm Convention and the annexes to the E-PRTR Regulation. Mutual harmonisation of those regulations would be a clear step forward. |