# Survey on experiences in implementing the UNECE Protocol on Pollutant Release and Transfer Registers (PRTRs)

Questions

## Based on your country/organization experiences in implementing the Protocol on PRTRs, please list the following in relation to the Protocol on PRTRs:

* What is it strengths?
* What is it weaknesses?
* Are there opportunities that could exploit to its advantage?
* Are there threats that could cause negative impact on it?

## Annex I - What are your country/organization experiences gained in the implementation of Annex I of the Protocol (including capacity thresholds)?

* Do you collect information, on a point source level, on activities that are not listed in Annex I of the Protocol on PRTRs? (yes/no)
	+ If yes, please list additional activities (including capacity thresholds if applicable) and explain the reason for why this/these activities has/have been added (and why these capacity thresholds have been chosen, if applicable).
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value? (Please list)
* Do you collect information, on a point source level, on activities with lower capacity thresholds than those set in Annex I of the Protocol? (yes/no)
	+ If yes, please list and explain why lower capacity thresholds are set.
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value? (Please list)
* Based on your experiences from the implementation of the Protocol, are all relevant industrial activities included in Annex I to be able to collect 90%[[1]](#footnote-1) of the national total from industrial activities of each pollutant (yes/no)?
	+ If no, which activities are missing in your PRTR (Please list).

## Annex II - What are your country/organization experiences gained in the implementation of Annex II (including pollutant thresholds)?

* Do you collect information, on a point source level, on pollutants that are not listed in Annex II of the Protocol? (yes/no)
	+ If yes, please list those additional pollutants (including thresholds if applicable) and explain why this/these pollutants has/have been added (and why these thresholds have been chosen, if applicable).
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value? (Please list)
* Do you collect information, on a point source level, on pollutants with lower pollutants thresholds than those set in Annex II of the Protocol? (yes/no)
	+ If yes, please list and explain why lower thresholds are set.
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value? (Please list)
* Based on your experiences from the implementation of the Protocol, have you identified any pollutants that are crucially important the environment and for human health but are not listed in Annex II? (Please list)

## Other relevant aspects - What are your country/organization experiences gained in the implementation of other relevant aspects?

### Energy consumption

* Do you collect information, on a point source level, about energy consumption today? (yes/no)
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)

### Water consumption

* Do you collect information, on a point source level, about water consumption today? (yes/no)
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)

### Waste

* Do you collect information, on a point source level, about waste generation and waste management amount (recycled, landfilled, export)? (yes/no)
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)
* Do you collect information, on a point source level, about recycling rate for different waste streams according EWC?
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)

### On site transfer[[2]](#footnote-2)

* Do you collect information, on a point source level, about on-site transfer of waste or pollutants (e.g. via internal waste water treatment plant) today? (yes/no)
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)

### Storage

* Do you collect any information, on a point source level, about storage on site (either on pollutants or waste) today? (yes/no)
	+ If yes, please list what information is collected.
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)

### Other aspects

* Do you collect information, on a point source level, about any other aspects (for example productions volume) today? (yes/no)
	+ If yes, please list what information is collected.
	+ If yes, what challenges have you identified during implementation? (Please list)
	+ If yes, what is the added value of this inclusion? (Please list)
	+ If no, have you identified any obstacles for integrating the aspect in your PRTR? (Please list)

### Specification of reporting requirements for diffuse sources

* Based on your experiences from the implementation of the Protocol, what challenges have you identified during implementation of diffuse sources? (Please list)
* Have you included specific reporting requirements for diffuse sources? (yes/no)
	+ If yes, please list the reporting requirements?
	+ If yes, what is the added value of these requirements? (Please list)

## Exchange of information related to experience gained in areas identified in paragraph 39 of the report of the development of the Protocol on PRTRs (ECE/MP.PRTR/WG.1/2019/6)

Do you use PRTR-data for:

* Reporting related to sustainable development and circular economy (yes/no)
	+ If yes, what approach did you use during implementation?
	+ If yes, what is the added value?
	+ If yes, what challenges have you identified?
	+ If no, have you identified any obstacles?
* Reporting to other multilateral Environmental Agreements (yes/no)
	+ If yes, what approach did you use during implementation?
	+ If yes, what is the added value?
	+ If yes, what challenges have you identified?
	+ If no, have you identified any obstacles?
* Implementing the polluter pays principle (yes/no)
	+ If yes, what approach did you use during implementation?
	+ If yes, what is the added value?
	+ If yes, what challenges have you identified?
	+ If no, have you identified any obstacles?
* Promoting “actions to reduce pollution” and sharing pollution prevention methods (yes/no)
	+ If yes, what approach did you use during implementation?
	+ If yes, what is the added value?
	+ If yes, what challenges have you identified?
	+ If no, have you identified any obstacles?
* Integrating with data and information of other sectors (yes/no)
	+ If yes, what approach did you use during implementation?
	+ If yes, what is the added value?
	+ If yes, what challenges have you identified?
	+ If no, have you identified any obstacles?
* Improving waste-and wastewater-management reporting (yes/no)
	+ If yes, what approach did you use during implementation?
	+ If yes, what is the added value?
	+ If yes, what challenges have you identified?
	+ If no, have you identified any obstacles?

## Please share any other relevant information

1. According to the Guidance document for EPER implementation: According to Article 3 of the Commission Decision of 17 July 2000 (2000/479/EC) on the implementation of an European Pollutant Emission Register (EPER) according to Article 15 of Council Directive 96/61 EC concerning Integrated Pollution Prevention and Control (IPPC), *EPER aimed to cover at least 90 % of the total industrial emissions in Europe. The goal of the reporting threshold values was to minimise the reporting burden, although reporting of releases lower than the thresholds was also allowed. […] The actual numbers of the proposed threshold values had taken into account current data in the Netherlands, Germany and the United Kingdom (England and Wales) and the comments of various [EU] Member States.* In the Guidance to Implementation of the Protocol on Pollutant Release and Transfer Registers (page 19) it is further explained that *the IPPC Directive’s (96/61/EC) list of activities was used for the development of the Protocol, first of all for the practical reason that many UNECE countries already were or were to become members of the EU, and thus already had systems in place to control polluting emissions from the facilities carrying out these activities. A second reason was that these activities, together with the additional ones in the Protocol, were responsible for about 90 per cent of industrial pollution.* [↑](#footnote-ref-1)
2. According to the Guidance to Implementation of the Protocol on Pollutant Release and Transfer Registers (page 23): *Movements of pollutants/waste between two installations of the same facility on the same site or adjoining sites will be an on-site transfer. For example, if one installation disposes of waste in another installation, such as an incinerator that is part of the same facility, then the disposal of waste need not be reported, as it is considered to be an “on-site transfer”. However, releases of emissions from the incineration will need to be reported as releases to air and any solid or liquid waste remaining from combustion and air pollution control sent off-site for disposal will need to be reported.* [↑](#footnote-ref-2)