



Federal Ministry for the  
Environment, Nature Conservation,  
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Bonn, 02.10.2014

Dear Ms. Behlyarova,

Attached you'll find our corrections to the synthesis report on the implementation of the Protocol on Pollutant Release and Transfer Registers.

Many thanks in advance and kind regards

  
Dr. Gordo Jain

Attachment

- corrections to the synthesis report





Statement by Germany

**Agenda item 4 - Procedures and mechanism facilitating the  
implementation of the Protocol  
4 (a) Reporting mechanism**

**Synthesis report on the implementation of the Protocol on Pollutant  
Release and Transfer Registers - corrections**

Germany thanks for the preparation of the Synthesis report, but comments with corrections of proven factual mistakes in the report concerning the paragraphs 39 and 62 (including footnotes 98 and 99). These two paragraphs should read as follows (changes highlighted):

39. Parties may also have additional pollutants or lower emission thresholds in their national PRTRs. A large number of the Parties to the Protocol are EU member States. The EU extended annex II to the E-PRTR Regulation to include a further five pollutants, lowered the emission threshold for polychlorinated dibenzodioxins (PCDDs)/ polychlorinated dibenzofurans (PCDFs) and provided for five additional thresholds for releases into water. Four Parties<sup>62</sup> report that they extended their national registers to cover those five additional pollutants. Five Parties<sup>63</sup> simply mention that their reported pollutants differ from annex II to the Protocol because of the E-PRTR Regulation requirements. In these cases no further specifications were given. Serbia and Slovenia report that the pollutants have to be reported without any emission threshold. Four Parties<sup>64</sup> explicitly mention the additional five pollutants and the six lower thresholds (PCDDs/PCDFs and water). Four Parties<sup>65</sup> mention conformity with annex II to the Protocol; France in addition reports more pollutants than listed in annex II but does not specify them. A further three countries<sup>66</sup> refer to the E-PRTR Regulation with its additional five pollutants and six lower thresholds; the Czech Republic reports on an additional 26 pollutants in waste, **Germany on non-biogen CO<sub>2</sub>** and the Netherlands on an additional 22 lower thresholds. Norway states that it has more pollutants than listed in annex II to the Protocol, but without a fixed list of pollutants.

62. In order to provide the public with up-to-date information on pollutant releases and transfers, the Protocol set a maximum deadline of 15 months after the end of the reporting year for making the reported data publicly available in the registers. Twelve Parties make the data available within 12 months after the end of the reporting year.<sup>97</sup> Some Parties<sup>98</sup> make use of the whole 15-month period; **six** Parties<sup>99</sup> need only 14 months. Three Parties<sup>100</sup>



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state that they make the data publicly available within 16 months after the end of the reporting year and refer to the E-PRTR Regulation.

97 Sweden, daily update; Serbia, immediately after verification; Bulgaria, 1 June; Norway, 1 July; Czech Republic, 30 September; Spain, 15 November; Israel, 1 December; Croatia, 15 December; United Kingdom, third Monday in December; Slovakia and France, 31 December; Poland, immediately after reporting but within 15 months after the end of the reporting year by the latest.

98 E.g., Netherlands, **Germany** and Romania.

99 Belgium, Denmark, Hungary, Latvia, Luxembourg and Switzerland.

100 Austria, Ireland and Lithuania.

Furthermore, the paragraphs 73 (including footnote 107), 84 and 108 of the synthesis report contain inaccuracies in so far as they reflect only incompletely the information provided in different chapters of the German national implementation report (NIR). Germany understands this problem to relate to the way the synthesis report was drawn up by the Compliance Committee, that is: „Committee members referred to the answers to questions in the questionnaire that corresponded to the issues on which they reported” (see paragraph 11 of the synthesis report). Therefore, information relevant for the complete response to a specific question - which might have been provided by a Party at varying places in the text of the NIR - could not always be included in the synthesis report. The issue of where in a report which information should be mentioned is critical to the proper use of a document, but had apparently not been sufficiently addressed before and throughout the process of the preparation of both the NIRs and the synthesis report. In view of the 2017 reporting process, higher time and resource allocation to the work of the Committee and a clearly communicated working procedure of the Committee will be essential.

The paragraphs 73, 84 and 108 should therefore read as follows (changes highlighted):

73. In several countries<sup>106</sup> it is necessary to assess the quality of the data with regard to completeness, consistency and credibility following the E-PRTR guidance. Many Parties<sup>107</sup> have developed their own methodology to ensure the quality of the data in the PRTR report. Belgium has given detailed information on its methodology for validation. In addition to regular



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controls and data comparison for quality control, Luxembourg points out that they have further practical measures to guarantee better data quality — namely their capacity- building activities and by making calculation methodologies available to concerned facilities. The procedure for assessing the PRTR report is laid down by means of a “road map” in the Dutch PRTR Guidelines. The Croatian Environment Agency plans to prepare a “Manual for Keeping the Environmental Pollution Register”, which will contain instructions for working with the Environmental Pollution Register and procedures for data quality assurance. In three States<sup>108</sup> the data quality assurance is required by the conditions of the applicable permit. Additionally, a few Parties<sup>109</sup> use automatic tools for data validation.

107 Belgium, Croatia, **Germany**, Luxembourg, Netherlands, Poland, Serbia, Slovakia, Spain, Sweden, Switzerland, the former Yugoslav Republic of Macedonia and United Kingdom.

84. Three Parties<sup>110</sup> are still developing PRTR systems to provide electronic access to data. Estonia is still designing its PRTR system, and so its data publishing remains incomplete. The development of Serbia’s PRTR web page is being supported by the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety; at the moment the web page provides data for 2010–2012. The **web page of the former Yugoslav Republic of Macedonia was supported by the German Federal Environment Ministry's Advisory Assistance Programme (AAP) and the launch of the complete web portal of PRTR is scheduled for the first half of 2014.**

108. **The United Kingdom addressed in the report the issue related to the price of the information provided to the public; as an example, they mentioned “the Defra PRTR team has supplied the overall United Kingdom data set for 2007 to 2010 to organizations requesting them without a charge. In Northern Ireland, the competent authority makes paper copies additionally available, but this is by appointment”. Germany reports that the website is accessible and the dataset is available for download free of charge.**