

Your Voice In Europe: ROADMAP feedback for REFIT and Report on the implementation of the E-PRTR regulation

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Related document: REFIT and Report on the implementation of the E-PRTR regulation

Feedback:

See Comments in the attached document.

The EEB believes that a fundamental overhaul of the E-PRTR is needed to make it more user-friendly and in particular more effective in delivering improved information (benchmarking) as well as public participation in decision making.

We consider the Norwegian PRTR model <http://www.norskeutslipp.no/en/Frontpage/> as a good intermediate tool to implement for the EU which should be upgraded with the following features:

- *real time continuous monitoring data plug-in (this is commonly required by industry);*
- *better interlink with data on performance against environmental quality standards (water, air, chemicals);*
- *better visualization of permit limits with reported/real emissions to be expressed in the same reference conditions (for compliance assessment purpose);*
- *additional query search options like the US EPA AMPD to assess BAT implementation.*

In order to overcome the language barrier issue for PRTR reporting purposes a “standardized electronic EU permit” should be elaborated, the centralized EU database could then extract the relevant datafields e.g. permit ELVs for the various pollutants and other parameters of interest to be reported. This would not prevent the competent authorities to upload the consolidated permit / inspection report in their original language.

More information on the role of PRTRs for enhanced public participation are available here

http://www.unece.org/fileadmin/DAM/env/pp/prtr/PRTR_Global_Round_Table/GRT_2_Presentations/Item5c-c-Christian_Schaible.pptx

Feedback file:

[20151019EPTRquestionnaire_EEBCSFIN.pdf](#)