



This project is co-financed by the
European Union and the Republic of Turkey

Technical Assistance for Capacity Building on European Pollutant Release and Transfer Register (E-PRTR) in Turkey

TR2013/0327.06-01-02/001

Technical Assistance for Capacity Building on European Pollutant Release and Transfer Register (E-PRTR) in Turkey

Activity 2.2

Presentation: Turkish PRTR draft By-law - Update



Presenter:

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Overview

Progress to date

Key aspects of the draft Turkish PRTR By-law



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Objective

- Transpose Regulation (EC) 166/2006 on E-PRTR into Turkish legislation
- Establish an integrated PRTR system in Turkey
- Publically accessible electronic database
- Lays down rules for functioning of PRTR
- Facilitate public participation in environmental decision-making
- Contributes to the prevention and reduction of pollution of the environment



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Status of transposition

- Initial discussions with PRTR Unit in Ministry
- Prepare draft 1 based on those discussions
- Further discussions with PRTR Unit
- **Prepare draft 2 on By-law**
- Discussions within MoEU with other relevant departments
- Prepare draft 3
- Discussions with wider stakeholders
- Final draft By-law



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Key aspects of draft By-law on PRTR

- Registration of relevant activities
- Reporting requirements
- Quality assurance of data reported
- What information is made available to the public
- Permit condition to comply with PRTR By-law



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Scope – Facilities covered by PRTR

Covers all facilities that undertake one or more Annex 1 activities, if above the specified applicable Capacity Threshold.

Annex 1 lists 65 activities, in 9 categories:

- Energy production;
- Production and processing of metals;
- Mineral industry;
- Chemical industry;
- Waste and wastewater management;
- Paper and wood production and processing;
- Intensive livestock production and aquaculture;
- Animal and vegetable productions from the food and beverage sector; and
- Other activities



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Registration

ALL Annex 1 facilities must Register with MoEU

- Operator notification to the Ministry
- MoEU provides operator with unique ID and password to the PRTR Portal
- Operator must then Register on-line, providing the Annex 2 information
- Operator must inform MoEU of any relevant changes
- MoEU must keep Register up-to-date



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What needs to be reported by operator (1)

Releases to air, water or soil:

Annual releases of any of the 91 pollutants listed in Annex
3.

Pollutants include:

- Greenhouse gases;
- Other gases;
- Heavy metals;
- Pesticides;
- Chlorinated organic substances;
- Other organic substances;
- Inorganic substances.



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What needs to be reported by operator (2)

**Off-site transfers of any of the Annex 3 pollutants in
wastewater destined for wastewater treatment, including
any transfer via municipal sewer system**



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What needs to be reported by operator (3)

Off-site transfers of waste:

- **Off-site transfers of hazardous waste exceeding 2 tonnes per year**
- **Off-site transfers of non-hazardous waste exceeding 2000 tonners per year**



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The information that needs to be reported (1):

Releases of Annex 3 pollutants:

- The name & number of the pollutant
- Total amount released in the reporting year
- Whether this amount was measured (M), calculated (C) or estimated
- If M or C – the method used to measure or calculate
- Total amount of any accidental release



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The information that needs to be reported (2): Off-site transfers of Annex 3 pollutants in wastewater:

- The name & number of the pollutant
- Total amount released in the reporting year
- Whether this amount was measured (M), calculated (C) or estimated
- If M or C – the method used to measure or calculate
- Name & address of the wastewater treatment plant
- River Basin District



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The information that needs to be reported (3): Off-site transfers of hazardous waste within Turkey:

- The 6 digit waste code
- Quantity of that waste
- Whether it is going for recovery (R) or disposal (D)
- Whether this amount was measured (M), calculated (C) or estimated
- If M or C – the method used to measure or calculate



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The information that needs to be reported (4): Off-site transfers of hazardous waste outside Turkey:

- The 6 digit waste code
- Quantity of that waste
- Whether it is going for recovery (R) or disposal (D)
- Whether this amount was measured (M), calculated (C) or estimated
- If M or C – the method used to measure or calculate
- Name & address of the recoverer or disposer
- Address of actual recovery / disposal site



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The information that needs to be reported (5):

Off-site transfers of non-hazardous waste :

- The 6 digit waste code
- Quantity of that waste
- Whether it is going for recovery (R) or disposal (D)
- Whether this amount was measured (M), calculated (C) or estimated
- If M or C – the method used to measure or calculate



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The information that needs to be reported (6):

Information about the facility:

- Name & address of facility
- NACE code
- Main economic activity
- List of all Annex 1 activities being carried out at facility
- Production volume
- Number of operating hours
- Number of employees
- Electricity / gas / water consumption



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Quality assurance & assessment

- Operator must use best available information
- Operator must keep records for 5 years
- Operator must collect information with appropriate frequency so as to be able to report
- Operator must assure the quality of the information that they report
- Ministry must assess the quality of the data reported – especially as regards their completeness, consistency & credibility



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What information is made available to the public (1)

Operator must report to Ministry on ALL releases & off-site transfers of Annex 3 pollutants

BUT

Ministry will only make available to the public the releases which are over the Release Threshold Values set out in Annex 3



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What information is made available to the public (2) Confidentiality

- If operator wishes any information to be kept confidential and off the publically accessible PRTR, then operator **MUST** make a specific claim for that confidentiality
- Grounds for a claim for confidentiality are set out in Law 4982 and Law 6698
- Ministry will assess the request for confidentiality in accordance with those laws.



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Permit condition to comply with PRTR By-law

It will be a condition of any “permit” issued for a facility under Article 11 of the Environment Law that the Operator complies with the PRTR By-law

- A “permit” is defined as any permit or licence or temporary operating consent issued pursuant to Article 11 of Environment Law
- So will include:
 - Any permit etc issued under the Environmental Permit and Licensing Regulations OJ No 29115
 - Any permit issued under the (draft) IPPC Regulations



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Guidelines

Ministry may publish Guidelines on:

- Reporting procedures
- The data to be reported
- Quality assurance
- Quality assessment
- Reference to approved analytical & sampling methods
- Validation procedures.



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Thank you



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