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

E-PRTR System – Inventory & Portal Last Update

Presenter:

Marek Piaskowski

Date: 8-9 February 2018

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

Access to the Turkish E-PRTR National Inventory

User – natural person who operates and uses the application,

MoEU – The Ministry of Environment and Urbanization,

PD - Provincial Directorate

There are the following types of the National Inventory users: :

• The Ministry (MoEU) users

• The Provincial Directorate users

• The facility users

The Ministry users

The Ministry users will have permissions :

- To create accounts for other users

- To register the facilities in the system

  - with the facility identifications data and the unique identification number of the facility,

  - with Annex 1 activities,

  - only one account will be allowed for one facility

- To verify the facilities annual reports in the second step

- To create the Member State (national) report for the European Commission.

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

The Provincial Directorates users

The Provincial Directorate users will have permissions:

• to verify the facility annual reports in the first step (approve the reports or reject them for correction).

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

The facility users

The facility users will have permissions:

- To edit data of own facilities (without the identification data of the facility),

- for each facility to enter data concerning releases of pollutants to air, water, land and off-site transfer of pollutants and waste,

- to submit the annual report to verification,

- to correct rejected reports.

Verification process of the facility annual reports will be done in two steps

In the first step a submitted report is verified by the Provincial Directorate.
- If the report is approved by PD, in the second step it will be verified by the MoEU. When the MoEU rejects the report, it will be returned to the PD to resolve the rejection issue BUT this will not count as a PD rejection.
- Otherwise – if the report is rejected by PD - the facility user has to correct the report for further verification by Provincial Directorate.

In case that the report is three times rejected by the Provincial Directorate or two times approved by the PD, further verification of this annual report will only be carried out by the MoEU.
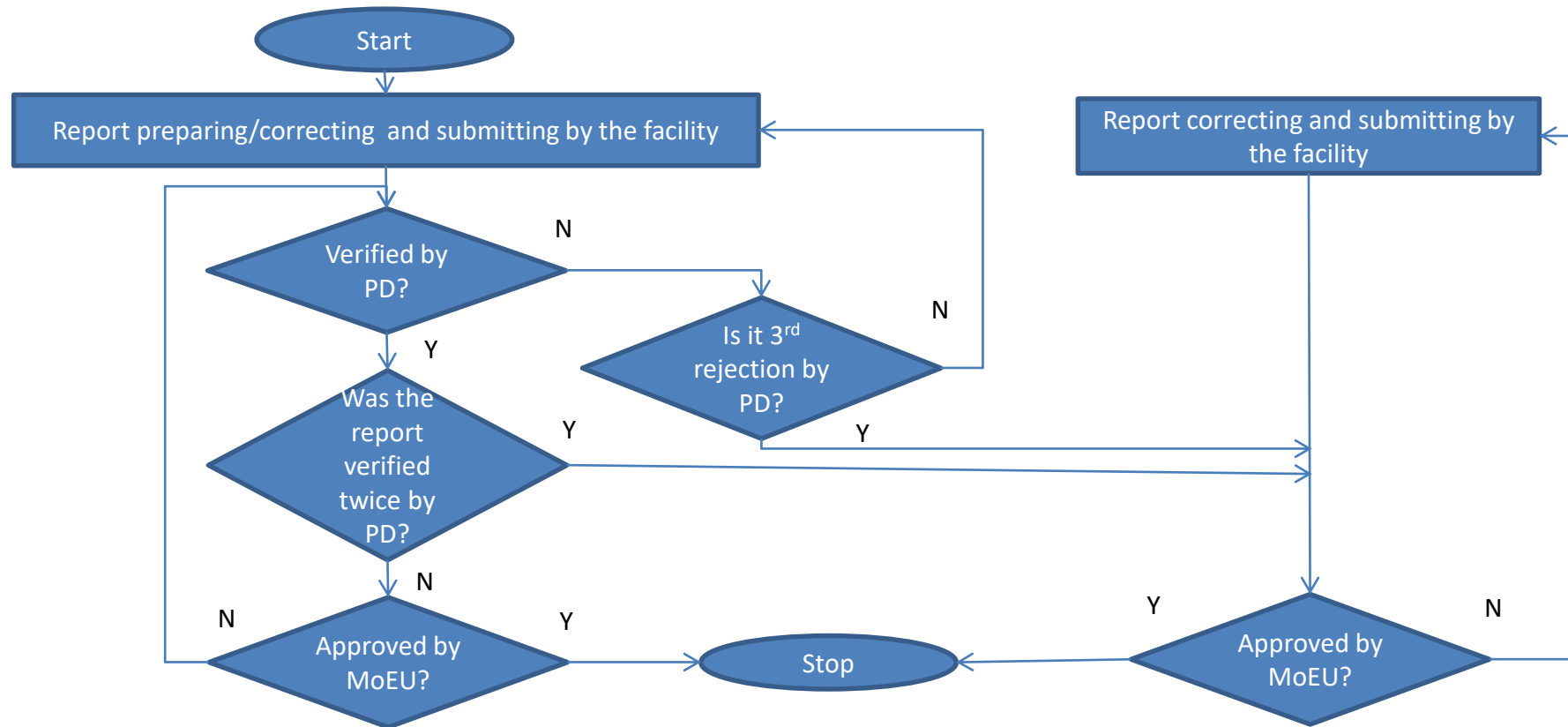
Verification/approval process – block diagram

Verification process – continuation

All statuses of the annual report will be visible for all users: on the facility level, the Province Directorate and the MoEU level.

When the facility annual report is rejected by the Provincial Directorate or the Ministry – the rejected sections will be flagged with description what is incorrect. Only flagged sections will be editable by the facility user during report correction.
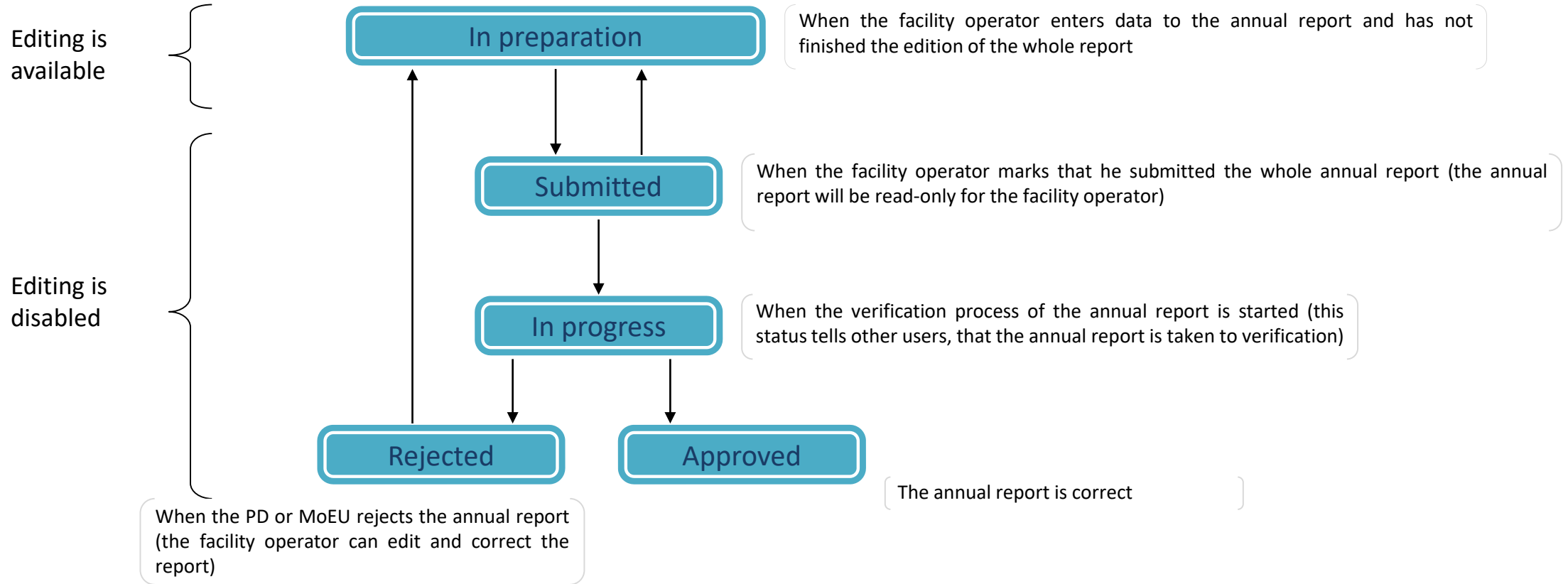
The statuses of the facility annual report

Editing is
available

Editing is
disabled

In preparation

When the facility operator enters data to the annual report and has not finished the edition of the whole report

Submitted

When the facility operator marks that he submitted the whole annual report (the annual report will be read-only for the facility operator)

In progress

When the verification process of the annual report is started (this status tells other users, that the annual report is taken to verification)

Rejected

Approved

The annual report is correct

When the PD or MoEU rejects the annual report (the facility operator can edit and correct the report)

Additional information in the facility annual report (according to XML national report structure)

The facility identification:
- The province of the facility,
- The building number,
- The production volume it is a matrix of three values:
  - Product name,
  - Unit code
  - Quantity
- Consumptions of electricity, gas and water
- The website address of the facility (must start with „http://") - always published
- Public information (textual additional information) – always published
- Remark text (some remarks and comments) – not published

Descriptions for releases and transfers sections (according to XML national report structure)

The field „Method used" could be filled only by a strict set of codes. For some codes it is mandatory to insert a text in „designation/description" field. The designation/description is required for method codes: CEN/ISO, ETS, IPCC, UNECE/EMEP. The text inserted in that field could be in national language.

For each pollutant and waste transfer record it is a new field „remark text". In this field user can insert any information e.g. for accidental releases. This field will not be published.

New report section: off-site transfer of waste-water quantities to receivers and river basins

- Waste water quantity (m^3)
- Water receiver (name, address)
- River basin (selected one of 25 positions).

This information must not be sent to the European Commission and published.

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

Quantities of releases and transfers must be expressed in national report to the Commission with three significant digits

Original result of the quantity determination	Result to be reported (in three significant digits)
0.0123456	0.0123
1.54789	1.55
7.071.567	7.07
123.45	123
10.009	10.0
1.0	1.00
0	0.00

Quantities of releases and transfers must be expressed with three significant digits – cont.

The facility users in their annual reports can insert exact quantities with bigger precision than three significant digits.

But they have taken into account that comparison with the thresholds is done with the quantities rounded to three significant digits.

For example: operator reports voluntarily a value of 9999.00 kg/year NH3 (ammonia); the result after rounding is 10 000 kg/year and that is equal to the threshold of 10 000 kg/year NH3. Although the original data are below the threshold, this data will be consequently after rounding regarded to be mandatory and will be published.

Voluntary and mandatory data

For the facilities practically all types of data are mandatory.
In the national report for the European Commission some types of data are treated as voluntary.

Voluntary data in the facility identification:
- Operating hours
- Number of employees
- Website address
- Public information
- Remark text

In other report sections as voluntary types of data are treated:
- Remark text
- Quantities below threshold (by decision of the MoEU will be not sent to the Commission)

Protection of voluntary data

The voluntary types of data – if sent with the national report - are published in the EC reports.

But the facility users have possibility to protect these types of data.
For that there is the field on the facility annual report level: protect voluntary data.
It indicates if voluntary data should be protected or not. The facility user can set value for that field – to protect or not protect the voluntary data. Protected data will be not published.

There are a few exceptions:
•Remark texts are never published
•Facility website address and public information are always published.

The claimed confidentialities

The facility operator will claim for confidentiality to the Ministry by email.
The claimed confidentialities of data will be verified only by the Ministry and the Ministry will mark data as confidential.

In the national report XML structure it is possible to mark as confidential following report parts:
• The facility identification
• The pollutants of releases - each pollutant separately
• The pollutants of waste water transfer - each pollutant separately
• The waste transfers - each record separately (record means different set of data: non hazardous/hazardous in Turkey/hazardous outside Turkey, waste treatment (recovery/disposal), waste receiver)

How to mark the data as confidential?

For each type of data that should be confidential and withheld the Ministry user must:

•To mark this data as confidential

•To provide the reason for confidentiality according to Directive 2003/4/EC, Article 4(2).

Legal confidentiality codes are as follows (for releases the list is restricted to green items):

Code	Description
A42a	Article 4(2)(a) of Directive 2003/4/EC
A42b	Article 4(2)(b) of Directive 2003/4/EC
A42c	Article 4(2)(c) of Directive 2003/4/EC
A42d	Article 4(2)(d) of Directive 2003/4/EC
A42e	Article 4(2)(e) of Directive 2003/4/EC
A42f	Article 4(2)(f) of Directive 2003/4/EC
A42g	Article 4(2)(g) of Directive 2003/4/EC
A42h	Article 4(2)(h) of Directive 2003/4/EC

The types of data that can be confidential

Not all fields it is possible to withhold in the annual report parts marked as confidential.
Data types that can be withheld are restricted.
We have to remember that is not possible to mark as confidential any voluntary data.

The facility identification - types of data that can be confidential

- Parent company name
- Facility name
- Street name
- Building number
- City name
- Postal code

Other types of the facility identification data must not be confidential, for example geographical coordinates, river basin district, NACE activity.

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

The pollutant releases - types of data that can be confidential

- Pollutant code – instead of the pollutant code **must** be reported the pollutant group
- Method used (with designation/description)

Other types of the pollutant releases data must not be confidential, for example the total quantity and the accidental quantity.

The pollutant transfers - types of data that can be confidential

- Pollutant code – instead of the pollutant code **must** be reported the pollutant group
- Method used (with designation/description)

Other types of the pollutant releases data must not be confidential, for example the method basic code (M/C/E) and quantity.

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

The waste transfers - types of data that can be confidential

- Waste treatment (recovery or disposal)
- Quantity
- Method basic code (M/C/E)
- Method used
- Waste recoverer/disposer

For waste transfers all types of mandatory data could be confidential.

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

E-PRTR XML FORMAT COMPARED TO GUIDANCE DOCUMENT

National report

The country reporting is reported on national report level. This replaces the reporting of the country for each facility.

A mandatory field for indicating the coordinate system used for reporting of coordinates have been introduced on national report level.

A voluntary field for giving remarks has been introduced on national report level

E-PRTR XML FORMAT COMPARED TO GUIDANCE DOCUMENT – CONT.

Identification of the facility

"The Text field for textual information…" has been replaced by three fields:
- A voluntary field for the web address of the facility (will always be published)
- A voluntary field for public information (will always be published)
- A voluntary field for remark text (will never be published)

A mandatory field for indicating that voluntary data can not be published on the website has been introduced (protect voluntary data).

E-PRTR XML FORMAT COMPARED TO GUIDANCE DOCUMENT – CONT.

Activities

The E-PRTR activity codes consist of a number from 1 to 9 and a letter from (a) to (g). For some activities, there is a further sub-division from (i) to (xi). It has been made possible (but not required) to report activities on this sub-division level.

Quantities for releases and transfers

If the value reported **equals** the threshold it will be regarded to be mandatory.

E-PRTR XML FORMAT COMPARED TO GUIDANCE DOCUMENT – CONT.

Releases to air, water and land and off-site transfers of pollutants in waste water
Releases below the thresholds can be voluntary reported.
A voluntary field for giving remarks (e.g. on reasons for confidentiality) has been introduced (remark text).

Off-site transfers of waste
Releases below the thresholds can be voluntary reported.
A voluntary field for giving remarks (e.g. on reasons for confidentiality) has been introduced (remark text).
The address of the recoverer/disposer as well as the address of the actual site has been split into five fields: street name, building number, city, postal code and country. The identification of the country is reported by a code.

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

E-PRTR XML FORMAT COMPARED TO GUIDANCE DOCUMENT – CONT.

Reporting of Methods

The reporting of the calculation or measurement method used for determination of quantities is done in two fields: method used code and designation/description.

For each internationally approved method have been introduced codes:

CEN/ISO, ETS, IPCC and UNECE/EMEP. In the case of using these codes must be filled the designation/description field.

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

E-PRTR XML FORMAT COMPARED TO GUIDANCE DOCUMENT – CONT.

Confidentiality of Information

When confidentiality is claimed for available levels (facility identification, releases and transfers) the specific confidential data **should be withheld**. When in this case the data that could be confidential will be reported, the validation tool for national report will warn against such situation, but the national report can be submitted to the Commission.

For example when confidentiality is claimed for the facility identification and in national XML report for that facility will be reported the address of the facility and the parent company name - in European report for that facilities the address of facility is published, but the parent company name is withheld. The behavior of European reporting in this case is ambiguous.

Useful links:

E-PRTR User Manual:
http://cdr.eionet.europa.eu/help/eprtr/EPRTRUserManual.pdf

National report format, code lists and other:
http://cdr.eionet.europa.eu/help/eprtr/

Downloading of XML reports for given country:
http://cdr.eionet.europa.eu/ReportekEngine/searchxml
(select the scheme: http://www.eionet.europa.eu/schemas/eprtr/
PollutantReleaseAndTransferReport_2p0.xsd
and country).

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

Thank you