



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

Progress of Regulatory Impact Assessment activities in the context of the Turkish EPRTTR By-Law

Presentation held at the
Workshop of 8th and 9th Febr 2018
By Peter Futo, RIA Expert



NIRAS





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

Aims of RIA

- To identify the best route to transpose and implement the "EU Regulation (EC) No. 166/2006 on European Pollutant Release and Transfer Register." in Turkey
- To introduce / implement the Regulation to Turkey in a way that
 - Minimizes social costs, risks, weaknesses and threats
 - Maximizes social benefits , strenghts and opportunities
- To take into consideration the specific conditions of Turkish economy and public administration,
- To facilitate consultation and interest reconciliation





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

Beginning stages of RIA

(1) Evaluation of the **policy problem**. In case of EPRTTR:

- The right of citizens to environmental information.
- The need for internationally comparable data on pollution

(2) Consideration of **alternative options**. In case of EPRTTR:

In case of EPRTTR:

- On timing and gradualness of introduction.
- On granting confidentiality to certain data.

(3) Identifying public, private and non-governmental **stakeholders** affected by the Regulation. In case of EPRTTR:

- MOEU as main enforcing institution
- Industrial and agricultural producers, utilities, with special respect to, (but not restricted to) IPPC installations.
- professional associations and chambers representing the affected companies and utilities
- representatives of local and regional interest groups, e.g. consumer groups





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

Following stages of RIA

(4) Assessment of the likely economic, environmental and social **impacts** on the above mentioned stakeholders, with special respect to costs and benefits, risks and distributional effects.

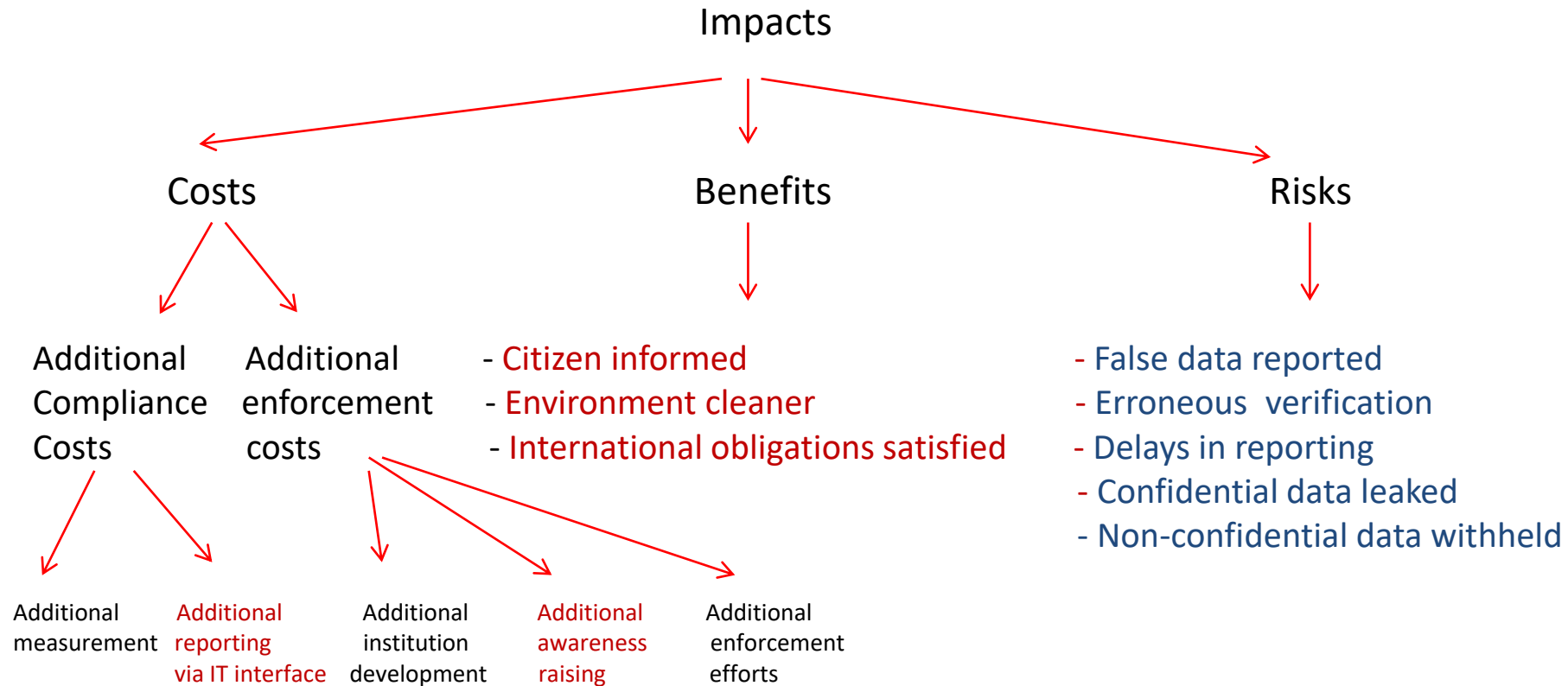
- Examples for costs:
 - additional **Government** activities in terms of administration, salaries and amendments to legislation
 - additional investments and activities to the facilities of **industry and public utilities**
 - winners and losers of the Regulation among **various sectors** of the economy.
- Examples for benefits:
 - Environmental and health **benefits** such as the reduction of certain environmental and health risks





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

Conceptual framework of regulatory impacts of EPRTTR





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

Closing stages of RIA

(5) Comparing options and selecting the optimal option of implementation

(6) Making recommendations on how to design enforcement in order to facilitate its implementability.





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

Possible sources of information: **Desk Research**

Study the EU's EPRTR website

Study the methods used in predecessor RIAs and Evaluations, such as:

- The EU's REFIT Evaluation of the E-PRTR (2013 and 2016)
- the Scottish E-PRTR RIA (2007) ,
- the evaluation of the Galician (Spain) E-PRTR system (2012),
- and the USA RIA on Mandatory Reporting of Greenhouse Gas Emissions Final Rule (2012)
- Turkey IPPC RIA (2014)
- and many others





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

Possible sources of information: **Fieldwork**

Conducting interactive workshops / correspondence based consultations / training courses with stakeholders.

Disseminating Questionnaires and the draft RIA Report among stakeholders. Collection of feedbacks from stakeholders

Conducting Questionnaire based business survey

Making site visits and interviews

- at Government Agencies (MoEU and its Provincial Directorates)
- at industrial facilities
- at public utility facilities
- at environmental laboratories
- at environmental consultancies





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

Interviews made in the Istanbul Region, November 2017

Day	EPRT Annex I Activity	Company	Sector	Location
20.11.2017	5 (f) - Urban waste-water treatment plants	İSKİ Paşaköy WWTP	Waste and wastewater management	Sancaktepe / Istanbul
21.11.2017	1 (a) - Mineral oil and gas refineries	Tüpraş	Energy	Körfez / Kocaeli
22.11.2017	6 (b) - Industrial plants for the production of paper and board and other primary wood products (such as chipboard, fibreboard and plywood)	Dentas Ambalaj	Paper and wood production and processing	Corlu / Tekirdag
22.11.2017	4 (a) (ii) - Chemical installations for the production on an industrial scale of basic organic chemicals	MKS Marmara	Chemical industry	Besiktas / Istanbul
23.11.2017	-	Aritsan	Environmental Laboratory	Izmit / Kocaeli
23.11.2017	5 (a) - Installations for the disposal or recovery of hazardous waste & 5 (d) - Landfills	İzaydaş	Waste and wastewater management	Izmit / Kocaeli
24.11.2017	-	MoEU Provincial Directorate of	Soil Pollution	Besiktas / Istanbul



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

Interviews made in the Ankara Region, December 2017

Date	EPRTTR Annex I Activity	Facility / Institution	Sector	Location
06.12.2017	1 (c) - Thermal power stations and other combustion inst.	GAMA Power Plant	Energy	Ankara
06.12.2017	--	Ankara Organized Industrial Zone	OIZ	Sincan/Ankara
06.12.2017	2 (f) - Installations for surface treatment of metals and plastic materials using an electrolytic or chemical process	Altım Aluminum	Production and processing of metals	Sincan/Ankara
07.12.2017	3 (a) - Underground mining and related operations	Koza Gold Mining	Mineral industry	Ankara
08.12.2017	3 (c) - Installations for the production of cement clinker in rotary kilns, lime in rotary kilns, cement clinker or lime in other furnaces	Turkish Cement Manufacturer's Association	Mineral industry	Ankara
09.12.2017	-	Chamber of Environmental Engineers	NGO	Ankara



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

Analytical method applied: **Standard Cost Method**

The Standard Cost Model is a framework for defining and quantifying **administrative burdens** for businesses . It was recommended by the EU Commission in 2004.

The method is widely applied for measuring administrative burdens.

Administrative burdens are the costs imposed on businesses, when complying with **information obligations** stemming from government regulation.

The EPRTR Regulation obliges a wide range of businesses to provide annual information about the pollution caused by them.





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

Two types of **obligations** due to regulations

Regulations may imply two types of obligations for businesses:

- - "Content obligations": In order to safeguard its public interests, Governments require businesses and private individuals to carry out or avoid certain actions or conduct. This may include technological measures or investment into physical infrastructure or equipment.
- - „Information obligations": Governments also require the provision of information on actions and conduct.

The above-mentioned obligations can involve costs.

Example of the difference between content obligations and information obligations

- - Ensuring that staff have a window in their workplace is a content obligation;
- - reporting this in an annual report on working conditions is an information obligation.





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

Expected outcomes of RIA activities

Events:

- Training course
- Workshop presentations
- Consultations
- Webinar

Written outputs:

- Memos of site visits / interviews
- RIA methodology
- Draft RIA report
- Final RIA Report





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

Selected preliminary results on compliance costs for industrial facilities and utility operators

Method of assessing pollution loads. Information required for EPRTTR purposes is readily available at most companies. It is relatively easy to calculate or estimate the necessary information from the following sources:

- Biannual measurements under the pre-existing **License and Permit Bylaw**.
- Continuous, daily, monthly or yearly measurements under various pre-existing **Environment Management bylaws** (air pollution, wastewater, soil, waste incineration, etc.)

According to the draft EPRTTR Bylaw,

- calculation based on previous measurements of concentration,
- or estimations based on production input data will be satisfactory.

There will be no need to ask **external laboratories** to implement measurements just for satisfying the needs of EPRTTR.





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

Further considerations to compliance costs

- **Range of pollutants.** Although the list of pollutants in Annex II contains 91 items, but for most of the affected facilities, the range of pollutants to be reported about is expected to be narrow. Typical firms in EU EPRTTR database report only zero to 10 pollutants, with a median of 2.
- **The range of companies** obliged to submit yearly EPRTTR Reports is likely to include mostly only medium sized and bigger companies with previous practice in reporting on pollutants in their previous interactions with MoEU. Big facilities as a rule employ **internal environmental expert staff** responsible for reporting to the Government, while medium sized firms rather **subcontract external environmental consultants** to do so.
- **The necessary IT know how** on how to report to MoEU via Internet based interfaces is available. The necessary practice has been obtained at facilities and **environmental consultants** while preparing computer based reports to MoEU under the pre-existing **License and Permit Bylaw** and the pre-existing **Environment Management bylaws** (air pollution, wastewater, soil, waste incineration, etc.)
- **Summary statement:** For the above reasons, the expected compliance **cost** of producing and sending the necessary EPRTTR parameters will be **low** in case of most facilities and most pollutants.





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

Online IT systems of MoEU for Environmental Management

- Waste Declaration System (TABS)
- Mobile Hazardous Waste Tracking System (MoTAT)
- Mass Balance System (KDS) for waste management
- Contaminated Sites Information System
- Wastewater Information System
- Packaging waste information system
- BEKRA (Prevention of the Risks of Major Industrial Accidents) Declaration System
- Large Combustion Plants Information System
- E-Inspection Application
- Waste Dumping System
- EE and WEEE Information System
- Ship Waste Tracking System (GATS)
- Voluntary Carbon Market Project Registration System
- Safety Information Note Notification
- Chemical Registration System
- Laboratory Authorization
- Ozone Depleting Substances (OTİM)
- End of Life Vehicles
- PCB Inventory
- Greenhouse Gas Monitoring and Reporting System





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

Thank you for your attention



NIRAS

