



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

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

TR2013/0327.06-01-02/001

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

# Preliminary Plan of the Regulatory Impact Assessment (RIA) Component of the E-PRTR project of Turkey



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### 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



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# Beginning stages of RIA

- Evaluation of the **policy problem**,
- Consideration of **alternative options**,
- Identifying public, private and non-governmental **stakeholders** affected by the Regulation, with special respect to
  - enforcement institutions of the public administration
  - 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



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# Following stages of RIA

- 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:
  - additional Government activities in terms of administration, salaries and amendments to legislation
  - additional investments and activities to the industry
  - environmental and health benefits such as the reduction of certain environmental and health risks
  - re-distribution of profits between smaller and bigger firms
  - winners and losers of the Regulation among various sectors of the economy.



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# Possible analogies and sources of information

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



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# Outcomes of RIA activities

- Training courses
- Workshop presentations
- Consultations
- Writing of **Draft RIA report** with conclusions and recommendations
- Dissemination of Draft RIA Report among stakeholders
- Collection of **feedbacks** from stakeholders
- Dissemination of **Final RIA Report** by taking into consideration feedbacks



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# Method of RIA

- Applying the **general** Regulatory Impact Assessment Guideline of Turkey to the **particular** case of introducing the E-PRTR REGULATION to Turkey.
- **Collecting** cost items of measurement, analysis and reporting.
- **Collecting data** by interviews, by business survey, by preparing company case studies, by public consultation (workshops, focus groups) and by document analysis.
- **Applying** the Standard Cost Method for calculating administrative burdens, with special respect to reducing administrative burdens.



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# Level of detail of results

- As a starting point, impacts will be presented in a **qualitative** manner for all stakeholder groups and for every investigated policy alternative. Qualitative level means that the RIA study will identify the impact mechanisms of the Regulation and the expected magnitude of the resulting costs and benefits.
- Additionally, **quantitative** (numerical) results will be provided by the RIA Study wherever data and conceptual models will be available.
- Besides providing basic data on stakeholders, the RIA study will highlight impacts in terms of costs and benefits in a **reasonable detail**:
  - by sectors of economy (e.g. chemical industry, agriculture, etc.),
  - by policy areas of the Government (e.g. environment protection, European integration, industrial policy, health policy, etc.)



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# Recommended phases of RIA activities

- Elaboration of detailed E-PRTR – specific and Turkey – specific RIA Methodology.
- Launching of Business Survey and Stakeholder Interviews
- Workshops and stakeholder consultations
- Elaboration and dissemination of Draft RIA Report
- RIA Training Course
- Collecting stakeholder comments to Draft RIA Report
- Final RIA Report
- RIA dissemination and awareness raising activities



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# RISKS and ASSUMPTIONS of RIA implementation

RIA preparation can be successful if and only if

- Economic experts, legal experts and environmental experts closely co-operate with each other,
- Public, private and non-governmental stakeholders are ready to give interviews, provide information during the data collection phase,
- Local consortium partner pro-actively helps in data collection, market research, policy enforcement research,
- Local consortium partner opens doors of relevant institutions for interviews and facilitates / assists in data collection.



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# Stage-by stage application of the **general RIA methodology** to the E-PRTR Project

The General RIA Methodology, was stipulated in  
Circular 2007/6

of the PRIME MINISTRY of the REPUBLIC OF TURKEY.

Subject : Regulatory Impact Analysis Studies.

Date: APRIL 02, 2007

Issued by: General Directorate of Personnel and Principles.



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### General METHOD, Stage 1 and 2:

#### 1. The Issue

1.1 Describe the issue

1.2 Map the relevant stakeholders

1.3 The current laws and regulations that are related to the issue

1.4 Arguments in support of the need to create a new law /  
regulation

#### 2. Objectives



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# Relevant E-PRTR-specific RIA Activities arising from Stage 1 and 2

To identify objectives. Examples for objectives in the international E-PRTR literature:

- To enhance public access to information through the establishment of coherent, nationwide pollutant release and transfer registers (PRTRs).
- To meet the requirements of the Aarhus Convention and the Kiev Protocol (sits) for public engagement in decision making.
- To foster the relationships between industry, government bodies, and the general public, in reducing and managing the emission/release of harmful substances to the environment.
- To use pollution information by policy-makers for revising or introducing new policies or instruments.

(see REFIT Study 2016)



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### General METHOD, Stage 3:

#### 3. The Alternative Options

3.1 The long list of (all) potential options

3.2 Screening of unsuitable options (short list of  
options)



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# Relevant E-PRTR-specific RIA Activities arising from Stage 3

The range of alternative options should be defined at a later stage of the RIA Process. Examples for possible options:

- To introduce immediately or at a later stage
- To introduce gradually, by gradually extending the scope of pollutants to be reported - or not
- To introduce gradually, by extending the scope of reporting industrial and waste facilities gradually – or not.
- To give exemptions for selected industries – or not.
- To finance the preparation of certain sectors - or not.



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### General METHOD, Stage 4:

#### 4. The impacts

- 4.1 Identification of the affected groups and areas
- 4.2 Analysis of costs and benefits
  - 4.2.1. Economic impacts
  - 4.2.2 Social impacts
  - 4.2.3 Environmental impacts



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# Relevant E-PRTR-specific RIA Activities arising from Stage 4:

Identification (mapping) of stakeholders

Stakeholders of the public administration:

- Ministries: Ministry of Environment and Urbanisation, Ministry of Health, Ministry of Food, Agriculture and Livestock , Ministry of Industry.
- Subordinated Government Agencies, Competent Authorities under the above mentioned Ministries

Industrial sectors and utilities

- Industrial and agricultural producers, operators of waste management and water management facilities,
- Professional associations and chambers representing the affected companies (e.g. Turkish Chemical Manufacturers Association, Chamber of Industry and Commerce etc.)

Environmental and consumer protection NGOs, consumer groups.



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# To identify the scope of the E-PRTR system in Turkey

- What economic activities should be under the Regulation? (EU+EFTA: as defined in Annex I of the Regulation).
- How many industrial and waste facilities will be covered? (EU + EFTA: E-PRTR provides pollutant and waste data on 30,000 industrial facilities)
- How many pollutants should be reported? (EU + EFTA: 91 pollutants as detailed in Annex II of the Regulation)
- Data how frequently should be reported? (EU+EFTA: annually)



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# Examples of impacts to be investigated

- additional Government activities in terms of administration, salaries and amendments to legislation
- additional investments and activities to the industry, with special respect to ePIC usage
- environmental and health benefits such as the reduction of certain environmental and health risks
- re-distribution of profits between smaller and bigger firms
- winners and losers of the Regulation among various sectors of the economy.



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### Further relevant E-PRTR-specific RIA Activities arising from Stage 4:

Identify the costs of

- Inventory Dataset,
- National E-PRTR server,
- and web-based software structure.

Identify costs of awareness raising

Identify benefits arising from a functioning E-PRTR system

- on society, in terms of health and general wellbeing.
- on the environment



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# General METHOD, Stage 5:

## 5. Analysis of alternative solutions



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# Relevant E-PRTR-specific RIA Activities arising from Stage 5:

### Possible steps of analysis:

- Detail and summarise costs for all alternatives
- Detail and summarise benefits for all alternatives
- Compare costs across various alternatives
- Compare benefits across various alternatives
- Compare costs and benefits for selected alternatives
- Identify conclusions on general impacts
- Identify recommendations for policy design and implementation



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### General METHOD, Stage 6:

#### 6. Consultation and Participation

6.1 Mapping of consultees

6.2 Consultation methods

6.3 Final consultation



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# Plan of relevant E-PRTR-specific RIA Activities arising from Stage 6

### Tasks related to consultation

- Define questions to be circulated, to be raised among consulted stakeholders
- Define range of stakeholders to be consulted. Use international analogies, e.g. Scottis RIA of E-PRTR
- Define settings in which consultation should take place (Business survey, Training course, conference, workshop, etc.)
- Prepare auxiliary documents (e.g. Questionnaires, interview outlines, , etc.)
- Implement consultation



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### General METHOD, Stage 7:

#### 7. Enforcement, monitoring and Evaluation

##### 7.1 Enforcement

##### 7.2 Monitoring of enforcement



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# Relevant E-PRTR-specific RIA Activities arising from Stage 7

Design practices of how to evaluate the E-PRTR regulation in Turkey

- Decide about frequency of evaluation of E-PRTR system (EU+EFTA: Triannually)
- Make recommendations on
- Overall implementation
- Quality assurance
- Penalties and fines
- Public participation
- Stakeholder consultations



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# Thank you very much



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