



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

Interim Results of RIA on Turkish PRTR



Presentation by

Peter Futo

Email: peter.futo@uni-corvinus.hu

Workshop: 5-9 March, 2018



NIRAS





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

Table of Contents

- Alternatives for legislating and implementing E-PRTR in Turkey
- Alternatives considered in other countries
- Framework of the cost analysis



NIRAS





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

The role of options/alternatives in RIA

RIA should

- support decision making
- identify relevant Policy Questions both on transposition and implementation
- formulate realistic Policy Options
- highlight strengths/weaknesses, advantages/disadvantages, costs/benefits of the Policy Options
- contain for each identified Policy Option
 - an explanation of the Policy Option
 - an evaluation of the Policy Option
 - a conclusion about the Policy Option (accepted / rejected / unconditionally / on the condition)



NIRAS





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

Alternatives of implementing E-PRTR: Which strategy?

List of Options identified by the T.A. Project





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

List of Options identified by the T.A. Project:

- Option 1: Delay Implementation until after IPPC/IED Implemented and implement in parallel to IPPC/IED
- Option 2. Implement in parallel to IPPC/IED
- Option 3. Partial Implementation Now: No Public Access, No Data Verification, No EC Reporting
- Option 4. Partial Implementation Now: No Public Access, Full Data Verification, EC Reporting
- Option 5.: Partial Implementation Now: No Public Access, Full Data Verification, No EC Reporting
- Option 6.: Full implementation now
- **Option 7. Implement all components now, but proceed by a sector-by-sector strategy, No Public Access, Full Data Verification, No EC Reporting**
- Option 8. : Implementation on the basis of the most polluting industries first: No Public Access, Full Data Verification, No EC Reporting



NIRAS





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

Option 7. Implement all components now, but proceed by a sector-by-sector strategy, No Public Access, Full Data Verification, No EC Reporting

Explanation of the Policy Option:

- E-PRTR data collection, verification and public dissemination would start immediately for certain sectors of the industry and for the affected utilities
- E-PRTR reporting would be extended to other sectors only gradually

Evaluation of the Policy Option:

- This is the accepted Option, for the following reasons.
- An optimal strategy to manage E-PRTR awareness raising and training activities
- Optimal scheduling for MoEU (internal and external staff, experts)
- Sectoral working groups can be established for each sector, doing training courses, publishing sector-specific Guidance Notes.
- Compared to other Options this saves enforcement costs and institution building costs



NIRAS





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

Alternatives of introducing E-PRTR considered in other countries



NIRAS





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

Question 1 - How to adapt to international trends of improving access to environmental information?

- Option 1.1. „No regulation”
- Option 1.2. „To ratify the Kiev Protocol”
- Option 1.3. „Apply E-PRTR as a blueprint”



NIRAS





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

Question 1 - How to adapt to international trends of improving access to environmental information?

	Public Administration / enforcing agencies	Facilities	International prestige of the country / Society / Environment	Environmental Consultants	Environmental Laboratories
Impacts	Summarized Enforcement Cost	Summarized Compliance Cost	Intangible Benefits or lack of benefits	Tangible benefits or lack of benefits	Tangible benefits or lack of benefits
Option 1.1. „No regulation”		—	☹☹☹	☹	☹
Option 1.2. „To ratify the Kiev Protocol”	XX	XX	😊😊	😊	☹
Option 1.3. „Apply E-PRTR as a blueprint”	XXX	XXX	😊😊😊	😊😊	☹





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

Question 2 - Adapt the Activity list and its capacity thresholds of Annex I to national needs?

Considered Options:

- Option 2.1. „Copy-Paste Annex I of the EU’s E-PRTR Regulation”
- Option 2.2. „Extend the Range of Facilities by Adapting Annex I to national needs”

Case study: The Czech Republic has opted for extending the range of E-PRTR facilities

- by including new activities
- and by reducing the capacity thresholds for reporting.

As a result, the number of E-PRTR facilities has grown dramatically.



NIRAS





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

Question 2 - Adapt the Activity list and its capacity thresholds of Annex I to national needs ?

	Public Administration / enforcing agencies	Facilities	International prestige of the country / Society / Environment	Environmental Consultants	Environmental Laboratories
Impacts	Summarized Enforcement Cost	Summarized Compliance Cost	Intangible Benefits or lack of benefits	Tangible benefits or lack of benefits	Tangible benefits or lack of benefits
Option 2.1. Copy-Paste Annex I of the EU's E-PRTR Regulation	XXX	XXX	☺	☺	☹
Option 2.2. „Extend the Range of Facilities by Adapting Annex I to meet national needs”	XXXXX	XXXXX	☺☺	☺☺	☹





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

Question 3 - Adapt the pollution load thresholds of Annex II to national needs?

Considered Options:

- Option 3.1. “Copy-Paste the thresholds of Annex II of the EU’s E-PRTR Regulation”
- Option 3.2. “PRTR Plus option: Dual application of the thresholds of Annex II”. Meaning: Obliging Annex I facilities to report pollution data irrespectively of the fact, whether pollution is under Annex II pollution threshold or not. Disregarding the thresholds of Annex II in defining reporting obligations, but reporting only above-threshold data to EU.

Case study: Spain entirely omitted Annex II reporting thresholds from their national E-PRTR regulation, thereby obliging their facilities to report more frequently and providing more information



NIRAS





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

	Public Administration / enforcing agencies	Facilities	International prestige of the country/ Society / Environment	Environmental Consultants	Environmental Laboratories
Impacts	Summarized Enforcement Cost	Summarized Compliance Cost	Intangible Benefits or lack of benefits	Tangible benefits or lack of benefits	Tangible benefits or lack of benefits
Option 3.1. "Copy-Paste the thresholds of Annex II of the EU's E-PRTR Regulation"	XXX	XXX	😊	😊	😐
Option 3.2. „Disregarding the thresholds of Annex II in defining reporting obligations, reporting only above-threshold data to EU.”	XXXXX	XXXXX	😊😊	😊😊	😐





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

Question 4 - Adapt the list of pollutants in Annex II to national needs?

Considered Options:

- Option 4.1. “Copy-Paste the list of pollutants in Annex II from EU’s E-PRTR regulation”
- Option 4.2. “Extending the list of pollutants in Annex II, with special respect to POPs”.

Case study: The Czech Republic added some POPs to Annex II of its PRTR Regulation and also the release to air of two other chemicals.



NIRAS





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

Question 4 - Adapt the list of pollutants in Annex II to meet national needs?

	Public Administration / enforcing agencies	Facilities	International prestige of the country/ Society / Environment	Environmental Consultants	Environmental Laboratories
Impacts	Summarized Enforcement Cost	Summarized Compliance Cost	Intangible Benefits or lack of benefits	Tangible benefits or lack of benefits	Tangible benefits or lack of benefits
Option 4.1. “Copy-Paste the list of pollutants in Annex II from EU’s E-PRTR regulation”	XXX	XXX	☺	☺	☹
Option 4.2. “Extending the list of pollutants in Annex II, with special respect to POPs”	XXXXX	XXXXX	☺☺	☺☺	☹





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

Method of the cost analysis



NIRAS





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

Method of assessing pollution loads I.

Information required for E-PRTR 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.)



NIRAS





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

Method of assessing pollution loads II.

According to the draft EPRTR 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**
- No need to implement measurements just for satisfying the needs of E-PRTR.



NIRAS





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

Items of compliance cost

According to the draft EPRTR Bylaw, facilities should provide best available information to E-PRTR databases. The associated cost elements are as follows:

- Development and implementation of the respective calculation / estimation methods
- Familiarisation / training of the IT reporting framework
- Co-operating with internal environmental experts or with external environmental consultants
- Analysing E-PRTR information (own pollution and pollution load of competitors)
- Modifying facility strategy by using E-PRTR information (own pollution and pollution load of competitors)



NIRAS





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

