eurelectric
powering people

E-PRTR Regulation Revision – Targeted Stakeholder Survey

A Eurelectric response paper

April 2021

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépot légal : D/2021/12.105/21

WG Environmental Protection

Contact:
Hélène LAVRAY, Senior Advisor – Renewables & Environment – 2030 Framework Lead,
hlavray@urelectric.org

E-PRTR Regulation revision - Targeted Stakeholder Survey

Response ID:647 Data

2. About you

1. Please provide the following details:

Your name: : Helene Lavray
Organisation name: : Eurelectric
e-mail address: : hlavray@eurelectric.org

Country of operation:

Belgium
Comments:

Stakeholder type:

Industry or trade association
Comments:

After completing this survey, are you willing to be contacted for any clarification, a follow-up interview and/or further updates on the impact assessment?

Yes

Organisation size:

2. Please indicate the two-digit NACE code of your primary business sector:

Economic activity section: : D - Electricity, gas, steam and air conditioning supply
Economic activity division: : D.35 - Electricity, gas, steam and air conditioning supply

3. Your use of pollutant registers

3. How often do you access pollutant registers?

	Never	Once per year or less frequent	Between once per month and once per year	Once per month	Between once per week and once per month	Once per week	More than once per week
A national pollutant release and transfer register							
The European Pollutant Release and Transfer Register (E-PRTR)							

What do you access the pollution register(s) for? (Multiple options can be selected)

Which data do you most often examine? (Multiple options can be selected)

4. I am:

4.

5. Is gathering and reporting the information to your competent authority time-consuming?

6. What is your estimate of how many person-days per year you need to collate and report the information to your competent authority?

7. Do you incur any other costs (beyond work time) to gather and report the information? If yes, please indicate.

5.

Is assessment of data quality time-consuming?

What is your estimate of how many person-days per year in total you need to assess the quality of data provided by facility operators?

For how many facilities are you responsible to assess the quality of data?

Do you incur any other costs (beyond work time) to assess the quality of data? If yes, please indicate.

6.

8. How would you rate the quality of the data in the E-PRTR?

9. How would you rate the completeness of the data in the E-PRTR?

10. Please rate the importance of the following aspects to improve the functioning and value of the E-PRTR. If 'Other', please explain below.

Comments:

7. Problem 1: Activities and activity thresholds

11. How important is it to include the following (agro-industrial) activities in the scope of the E-PRTR Regulation?

CO2 capture and storage installations : 100
Upstream oil and gas industries : 100
Battery production and recovery : NA / Don't know
Downstream ferrous metal processing activities: forging presses, cold rolling and wire drawing : NA / Don't know
Ship dismantling : NA / Don't know
Intensive cattle farms : NA / Don't know
Intensive mixed livestock farms : NA / Don't know
Intensive horticulture, i.e. growing plants (principally fruits and vegetables) under a roof or in greenhouses with high intensity use of water, energy, pesticides and fertilisers : NA / Don't know

12. If included (see preceding question), what would be appropriate E-PRTR activity thresholds for the following activities?

Please suggest threshold value, unit of measure and provide supporting information. Please leave blank if you don't know.

	Threshold	Unit of Measure
CO2 capture and storage installations	20 MW aggregated (like ETS)	
Upstream oil and gas industries		
Battery production and recovery		
Downstream ferrous metal processing activities: forging presses, cold rolling and wire drawing		
Ship dismantling		
Intensive cattle farms		
Intensive mixed livestock farms		
Intensive horticulture, i.e. growing plants (principally fruits and vegetables) under a roof or in greenhouses with high intensity use of water, energy, pesticides and fertilisers		

13. For the following activities, how important is it to align the E-PRTR and the IED categorisations?

14. What would be the effect of aligning E-PRTR and IED activity categorisations as described in the preceding question? Please explain.

Make no difference to my current tasks related to the pollutant register
Comments: No problem for LCPs.

15. How important is it to clarify the definition of landfill releases by adding to activity 5(d) the words 'including flaring of vent gas'?

16. How important is it to extend the E-PRTR activity threshold to cover combustion plants with the following capacities?

1 – 5 MW : 0
>5 – 20 MW : 0
>20 – 50 MW : 30

17. For the purpose of legislative coherence, how important is it to lower the existing threshold for UWWTP from 100,000 p.e. to the options below? If 'Other', please specify.

Comments:

18. How important is it to include the following industrial activities in the scope of the E-PRTR Regulation?

19. In addition to the activities mentioned in the preceding eight questions, are you aware of other (agro-)industrial activities with major environmental pressures in the EU and currently outside the scope of the E-PRTR? If yes, specify the activity, the relevant environmental pressures and supporting information:

20.
If all changes suggested in the preceding questions were to be implemented, how would the revision of the scope of the E-

PRTR Regulation with regard to activities and activity thresholds affect the time you spend on reporting information to your competent authority? Please indicate the number of additional person-days.

The time spent for reporting would be very important: 1) as most of the pollutants are not continuously monitored alternative methods will have to be developed (based on discontinuous measurements or emission factors) and validated = at least 1/2 FTE for 2 years. 2) the first years for plants that never reported would also be very heavy = at least 1/2 FTE for 4 years

If all changes suggested in the preceding questions were to be implemented, how would the revision of the scope of the E-PRTR Regulation with regard to activities and activity thresholds affect the time you spend on quality-assuring the data provided by facility operators?

21. What is the particular change in scope of the E-PRTR Regulation with regard to activities and activity thresholds that would trigger the change in the work time spent on PRTR-related duties?

Eurelectric is against the lowering of the current 50 MWth threshold for the application of the E-PRTR. Although the alignment with the ETS threshold (20 MWth) might seem like a logical step, installations in this segment (20-50 MWth) under these two instruments would follow different rules (in particular on aggregation) and answer to different objectives (decarbonisation and pollution impact). This would increase administrative and financial burden on smaller combustion plants.

Lowering the threshold for combustion plants from 50 to 20 MW would require to include several thousands of additional MCP under the E-PRTR-framework. It would significantly increase the number of combustion plants for which exceedances of the pollutant thresholds would have to be assessed. Only in some cases the emissions would actually have to be reported. Note that in many cases emissions associated with MCPs are already reported as integral or auxiliary part of an E-PRTR-installation. On average, the contribution of alone-standing MCP of the 20 – 50 MW category to the overall air and GHG emissions of the power sector is expected to be rather small (< 5 %). For other environmental media (soil, water) and waste transfers the contribution should be insignificant. Note that, in general, MCPs do not apply wet flue gas abatement techniques. In line with the MCPD requirements, the emission monitoring at these plants is generally based on periodic measurements once every year or once every three years. Therefore, the annual E-PRTR-reporting of air emissions would have to be based merely on time- and labour-intensive estimates and expert judgements rather than on continuously monitored data.

8. Problem 2: Pollutants and thresholds for reporting releases

22. Is it important to include the following pollutants in the scope of the E-PRTR Regulation?

	Releases to air			Releases to water			Releases to land		
	Not important	Important	NA / Don't know	Not important	Important	NA / Don't know	Not important	Important	NA / Don't know
17-beta-Estradiol (E2); 17-alpha-Ethinylestradiol (EE2); Estrone (E1)									
2-Ethoxyethanol / ethylene glycol monoethyl ether									
Acetaldehyde									
Aclonifen									
Acrolein									
Acrylamide									
Acrylic acid and its water-soluble salts									

Acrylonitrile									
Antimony and compounds (as Sb)									
Beryllium and compounds (as Be)									
Bifenox									
Bisphenol-A									
Carbamazepine									
Black carbon (BC)		X							
Carbon disulphide									
Chromium (VI) compounds (as Cr)									
Cobalt and compounds (as Co)									
Cybutryne									
Cypermethrin									
Dichlorvos									
Dicofol									
Fluorinated ethers and alcohols									
Formaldehyde (formalin)									
Glyphosate									
Hexabromocyclododecane (HBCDD)									
Hydrogen sulphide									
Macrolide antibiotics (azithromycin, clarithroymycin, erythromycin)									
Manganese and compounds (as Mn)									
Microplastics, i.e. materials consisting of solid polymer-containing particles, where ≥ 1% w/w of particles have (i) all dimensions 1nm ≤ x ≤ 5mm, or (ii), for fibres, a length of 3nm ≤ x ≤ 15mm and length to diameter ratio of >3.									
n-Hexane									
Neonicotinoids (Imidacloprid, Thiacloprid, Thiamethoxam, Acetamiprid, Clothianidin)									
Nitrogen trifluoride (NF3)									

Nicosulfuron (herbicide)									
Per- and Polyfluoroalkyl Substances (PFAS) all PFAS as a group, or									
Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds									
Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOS-F)									
Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds									
PM2.5		X							
Polychlorinated naphthalenes									
Pyrethroids (Bifenthrin, Deltamethrin, Esfenvalerate, Permethrin)									
Quinoxyfen									
Selenium and compounds (as Se)									
Short-chain chlorinated paraffins (SCCPs)									
Silver (biocide)									
Sulfamethoxazole									
Sulphates									
Terbutryn									
Thallium and compounds (as Tl)									
Tin and tin compounds (as Sn)									
Total suspended solids (TSS)									
Triclosan									
Vanadium and compounds (as V)									

23. If included (see preceding question), what would be appropriate E-PRTR thresholds for reporting releases? Please suggest threshold value and provide supporting information.

	Release to air - threshold value (kg/y)	Release to air - supporting information	Release to water - threshold value (kg/y)	Release to water - supporting information	Release to land - threshold value (kg/y)	Release to land - supporting information
17-beta-Estradiol (E2); 17-alpha-Ethinylestradiol (EE2); Estrone (E1)						
2-Ethoxyethanol / ethylene glycol monoethyl						

ether						
Acetaldehyde						
Aclonifen						
Acrolein						
Acrylamide						
Acrylic acid and its water-soluble salts						
Acrylonitrile						
Antimony and compounds (as Sb)						
Beryllium and compounds (as Be)						
Bifenox						
Bisphenol-A						
Black carbon (BC)						
Carbamazepine						
Carbon disulphide						
Chromium (VI) compounds (as Cr)						
Cobalt and compounds (as Co)						
Cybutryne						
Cypermethrin						
Dichlorvos						
Dicofol						
Fluorinated ethers and alcohols						
Formaldehyde (formalin)						
Glyphosate						
Hexabromocyclododecane (HBCDD)						
Hydrogen sulphide						
Macrolide antibiotics (azithromycin, clarithroymycin, erythromycin)						
Manganese and compounds (as Mn)						
Microplastics i.e. materials consisting of solid polymer-containing particles, where ≥ 1% w/w of particles have (i) all dimensions 1nm ≤ x ≤ 5mm, or (ii), for fibres, a length of 3nm ≤ x ≤ 15mm and length to diameter ratio of >3.						
n-Hexane						
Neonicotinoids (Imidacloprid, Thiacloprid, Thiamethoxam, Acetamiprid, Clothianidin)						
Nitrogen trifluoride (NF3)						
Nicosulfuron						

Per- and Polyfluoroalkyl Substances (PFAS) all PFAS as a group, or						
Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds						
Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOS-F)						
Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds						
PM2.5						
Polychlorinated naphthalenes						
Pyrethroids (Bifenthrin, Deltamethrin, Esfenvalerate, Permethrin)						
Quinoxyfen						
Selenium and compounds (as Se)						
Short-chain chlorinated paraffins (SCCPs)						
Silver (biocide)						
Sulfamethoxazole						
Sulphates						
Terbutryn						
Thallium and compounds (as Tl)						
Tin and tin compounds (as Sn)						
Total suspended particulate (TSP)						
Total suspended solids (TSS)						
Triclosan						
Vanadium and compounds (as V)						

Comments: It could be useful to include PM 2.5 and black carbon as it would inform stakeholders and the policy debate. However, not every plant should report (only major emitters). The threshold should be correlated to the total dust threshold. Reporting should not require additional measurements but be based on typical correlation depending on fuel, plant size and abatement measures.

24. How important is it to implement the following mechanisms? Please explain your answers.

Comments:

25. Are there any other pollutants that should be considered for inclusion in the scope of the E-PRTR Regulation? Please justify your suggestions.

26. Are there any pollutants that should be considered for removal from the scope of the E-PRTR Regulation? Please justify your suggestions.

	To be considered for removal?	Justify your suggestion
Methane (CH4)		

Methane (CH4)		
Carbon monoxide (CO)		
Carbon dioxide (CO2)		
Hydro-fluorocarbons (HFCs)		
Nitrous oxide (N2O)		
Ammonia (NH3)		
Non-methane volatile organic compounds (NMVOC)		
Nitrogen oxides (NOx/NO2)		
Perfluorocarbons (PFCs)		
Sulphur hexafluoride (SF6)		
Sulphur oxides (SOx/SO2)		
Total nitrogen		
Total phosphorus		
Hydrochlorofluorocarbons (HCFCs)		
Chlorofluorocarbons (CFCs)		
Halons		
Arsenic and compounds (as As)		
Cadmium and compounds (as Cd)		
Chromium and compounds (as Cr)		
Copper and compounds (as Cu)		
Mercury and compounds (as Hg)		
Nickel and compounds (as Ni)		
Lead and compounds (as Pb)		
Zinc and compounds (as Zn)		
Alachlor		
Aldrin		
Atrazine		
Chlordane		
Chlordecone		
Chlorfenvinphos		
Chloro-alkanes, C10-C13		
Chlorpyrifos		
DDT		
1,2-dichloroethane (EDC)		
Dichloromethane (DCM)		

Dieldrin		
Diuron		
Endosulphan		
Endrin		
Halogenated organic compounds (as AOX)		
Heptachlor		
Hexachlorobenzene (HCB)		
Hexachlorobutadiene (HCBD)		
1,2,3,4,5,6-hexachlorocyclohexane(HCH)		
Lindane		
Mirex		
PCDD + PCDF (dioxins + furans) (as Teq)		
Pentachlorobenzene		
Pentachlorophenol (PCP)		
Polychlorinated biphenyls (PCBs)		
Simazine		
Tetrachloroethylene (PER)		
Tetrachloromethane (TCM)		
Trichlorobenzenes (TCBs) (all isomers)		
1,1,1-trichloroethane		
1,1,2,2-tetrachloroethane		
Trichloroethylene		
Trichloromethane		
Toxaphene		
Vinyl chloride		
Anthracene		
Benzene		
Brominated diphenylethers (PBDE)		
Nonylphenol and Nonylphenol ethoxylates (NP/NPEs)		
Ethyl benzene		
Ethylene oxide		
Isoproturon		
Naphthalene		
Organotin compounds (as total Sn)		

Di-(2-ethyl hexyl) phthalate (DEHP)		
Phenols (as total C)		
Polycyclic aromatic hydrocarbons (PAHs)		
Toluene		
Tributyltin and compounds		
Triphenyltin and compounds		
Total organic carbon (TOC) (as total C or COD/3)		
Trifluralin		
Xylenes		
Chlorides		
Chlorine and inorganic compounds		
Asbestos		
Cyanides (as total CN)		
Fluorides (as total F)		
Fluorine and inorganic compounds (as HF)		
Hydrogen cyanide (HCN)		
Particulate matter (PM10)		
Octylphenols and Octylphenol ethoxylates		
Fluoranthene		
Isodrin		
Hexabromobiphenyl		
Benzo(g,h,i)perylene		

27. For the overall effectiveness of the E-PRTR, how important is it to reduce reporting thresholds to capture 90% of industrial releases?

70

28. As suggested above, how would the revision of the scope of the E-PRTR Regulation with regard to pollutants and reporting thresholds affect the time you spend on reporting information to your competent authority? Please indicate the number of additional or fewer person-days.

There would be an increase in workload for (smaller) plants. A threshold is necessary for a certain coverage but for many pollutants industrial releases make only a small contribution across all sectors.

As suggested above, how would the revision of the scope of the E-PRTR Regulation with regard to pollutants and reporting thresholds affect the time you spend on quality assuring the data provided by facility operators?

29. What is the particular change in scope of the E-PRTR Regulation with regard to pollutants and reporting thresholds that would trigger the change in the work time spent on PRTR-related duties?

If you look at more installations/sub-installations and more pollutants, it will increase the workload. For the power sector this

would be particularly the case with an extension to medium combustion plants. Currently, for existing pollutants emissions are calculated based on continuous or periodic measurements with activity rates. An extension would mean more estimate based periodic measurement. Interpretation of data will be complex when based on periodic measurement. New pollutants should be added on the basis that they are clearly relevant for each sector. For significant pollutants, there will be a problem to interpret data from a year to another.
For not significant pollutants, it is better to allow operators not to assess and report as there will be too many pollutants.

30. Should the E-PRTR supporting guidance specify which pollutants must be reported for which activity? Please explain.

Yes
Comments:

31. Should the E-PRTR supporting guidance specify which release quantification method is to be used for reporting to the E-PRTR? Please explain.

Yes
Comments: Reporting (and monitoring) rules should be harmonised between the different regulations regarding averaging periods: criteria for the validation of an average, handling of the uncertainties on data, ...

9. Problem area 3: Information to track progress towards the circular economy and decarbonisation of industry

32. How important is it to require the reporting of additional contextual information? If 'Other contextual information', please specify in the text box below.

Energy consumption : 70
Energy recovery / reuse : 0
Raw materials consumption : Don't know
Water consumption : Don't know
Percentage of water reused : Don't know
Composition of waste transfers : Don't know
Other contextual information : Don't know
Comments: Energy consumption may be a competitive issue. For LCPs, E-PRTR should be in line with the LCP reporting framework.

33. How would these additional reporting requirements affect the time you spend on reporting information to your competent authority?

Comments:

How would these additional reporting requirements affect the time you spend on quality assuring the data provided by facility operators?

Comments:

34. How important is it to require reporting of disaggregated HFCs, HCFCs, CFCs and PFCs? Please explain.

Comments:

35. Which individual HFCs, HCFCs, CFCs and PFCs compounds / sub-groups should be reported?

10. Problem area 4: Reporting modalities and data flow

36. In order to reduce administrative burden, how important is it to introduce flexibility in E-PRTR reporting modality for certain sectors? E.g. national/regional collation for intensive livestock farming. Please explain.

Comments:

37. Beyond the reduction of administrative burden, what are the pros and cons of adopting a top-down approach for certain activities?

38. How would the following approaches affect the time lag between end of a reporting year and the time that data become available on the E-PRTR? If 'Other' approaches, please explain.

Comments:

39. What are the main challenges with their implementation?

	Challenge
Improved reporting system to submit data to competent authorities (e.g. immediately flags errors and inconsistencies and enables communication and tracking of follow-up questions)	
Near real-time reporting of CEMS data for certain activities	
Clearer guidance on what pollutants should be reported and what quantification method to use	
Guidance and tools to assist the competent authorities with the review process (e.g. earlier flagging of anomalies and typical discrepancies)	
Improved submission system to EEA, to receive feedback, and to resolve follow-up questions quicker	
Other approaches specified in the preceding question.	

40. How would implementation of some or all of these approaches to reduce the time lag between the end of reporting year and availability of data affect your organisation? Please explain.

Comments:

11. Problem area 5: Access to E-PRTR information

41. How important is it to require releases to be reported at a 'sub-facility level', i.e. by installation? Please explain.

0

Comments: It is very difficult to report emissions and waste transfer at sub-facility level. Some things can be common to multiple units e.g. water consumption. In many cases infrastructures are shared and emissions are common. Disaggregated values are not available. Like ETS this should stick to the installation level.

42. How would reporting at installation level, rather than facility level, affect your workload?

Comments:

43. Do you find it easy to access and use published E-PRTR information? Please explain.

Comments:

44. Is the E-PRTR useful for the below purposes? If you answered that the E-PRTR is not useful for any of the below purposes, please explain and indicate how it could be improved.

Comments:

45. How important is it for the E-PRTR to be available in languages other than English?

12. Problem area 6: Releases from diffuse sources and releases from products

46. Have you ever accessed the E-PRTR information on releases from diffuse sources?

47. How can the current E-PRTR information on releases from diffuse sources be improved?

48. What would be the best way to compile estimates of releases from diffuse sources?

49. How important is it for the E-PRTR to estimate releases from products? Please explain.

Comments:

50. What do you consider would be the best mechanism to derive estimates of releases from products?

13. General

51. Please provide any other comment or suggestion you would like to share regarding the revision of the E-PRTR Regulation.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

Union of the Electricity Industry - Eurelectric aisbl
Boulevard de l'Impératrice, 66 – bte 2 - 1000 Brussels, Belgium
Tel: + 32 2 515 10 00 - VAT: BE 0462 679 112 • www.eurelectric.org
EU Transparency Register number: 4271427696-87