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Regional Meeting on Reporting of Releases to Marine and Coastal Environment from Land Based Sources Activities and related Indicators

Tirana, Albania,19-20 March 2019

Agenda item 3: Template on PRTR Regulation

Template on PRTR Regulation

The meeting has been organized in collaboration with the European Union funded Project ENI SEIS II South Implementation of the Shared Environmental Information System (SEIS) principles and practices in the ENP South region – SEIS Support Mechanism

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1 Introduction

1. During the Regional Meeting on PRTR and Pollution Indicators in Ankara, Turkey in June 2014, and with the view to supporting countries in the framework of MAP and H2020 Programme of work, the Meeting recommended:

- Developing PRTR legal framework based on a review of gaps, limitations and options among Mediterranean countries; and
- Agreeing on a common priority list of chemicals, activities and emission factors among all the countries as appropriate.

2. In December 2017, the Contracting Parties at their 20th Ordinary Meeting in Tirana, Albania, adopted the Programme of Work which mandated MED POL to finalize PRTR guidelines and common emission factors to assess the load of pollutants to the Mediterranean Sea; as well as requested the support to the Contracting Parties in their implementation of NBB/PRTR reporting.

3. Further to its mandate in the Programme of Work (2018-2019), MED POL prepared the first draft of the legal template further to preliminary inputs for the PRTR legal framework which were discussed during the 2nd ENI SEIS II South Support Mechanism Regional Workshop on Indicators in Athens, Greece on 17-18 April 2018.

2 Proposed main elements of the Regulation for PRTR and Promotion of Chemical Management

4. PRTRs are inventories of pollution from industrial sites and other sources. PRTR obligates business operators to estimate and report the amounts of chemical substances released into the environment or transferred to outside facilities. Although it regulates information on pollution, rather than pollution directly, the PRTR regulatory framework/law exerts a significant downward pressure on levels of pollution, as no business entity will want to be identified as among the biggest polluters.

5. Hence, the objective of national PRTR Regulation for Release Amounts of Specific Chemical Substances in the Environment is to promote voluntary management of chemical substances handled by business operators and prevent environmental pollution

6. The following elements are proposed to be incorporated into a “legal template” for consideration by the Countries when developing their national PRTR Regulation.

2.1 Aim of the Regulation

7. The purpose of the PRTR Regulation concerning reporting of the release to the environment of specific chemical substances is to promote businesses' voluntary improvements in the management of specified chemical substances and to prevent any environmental protection impediments. This regulation requires businesses to report the release and transfer of chemical substances of concern (PRTR reporting) under the PRTR System.

8. Under the PRTR Regulation, “Designated Chemical Substances” are subject to the provision of the Regulation. “Designated businesses/ industries/ activities” are obliged to confirm and notify the release amounts of chemical substances in the environment in line with this Regulation.

2.2 Definitions

9. The following definitions should be considered for inclusion in the PRTR Regulation:

‘Pollutant’: A substance or a group of substances in gaseous, liquid or solid form that may be harmful to the environment or to human health on account of its properties and of its introduction into the environment;

‘Release’: Any introduction of pollutants into the environment as a result of any human activity, whether deliberate or accidental, routine or non-routine, including spilling, emitting, discharging, injecting, disposing or dumping, or through sewer systems without final waste-water treatment;

‘Transfer’: The movement beyond the boundaries of a facility of waste destined for recovery or disposal and of pollutants in waste water destined for wastewater treatment;

‘Facility’: A stationary technical unit where one or more activities are carried out and any other directly associated activities which have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution;

‘Owner’: The person possessing a facility;

‘Operator’: The person responsible for the production processes in a facility who is in charge for the facility’s environmental performance;

‘Competent authority’: The administrative unit within a Ministry or Agency which has the responsibility to introduce and operate the PRTR system;

‘Public’: One or more natural or legal persons, and, in accordance with national legislation or practice, their associations, organizations or groups.

2.3 Designated Substances under PRTR Regulation

10. Designated chemical substances are those which are deemed harmful to humans and ecosystems, and those which disperse widely in the natural environment and may be exposed. A proposed list of specified substances under the PRTR Regulation is included in Annex I.

2.4 Exemptions under PRTR System

11. Products with low contents of specified chemical substances, solid substances, products for general consumer purposes and sealed products may be exempt from PRTR due to their low emission levels. Threshold values for exclusion are included for each chemical substance in Annex I.

2.5 Targeted Activities of PRTR Reporting

12. Targeted activities referred to also as “Designated Businesses/ Industries/ Activities,” are those which produce or use chemical substances specified in the "Designated Chemical Substances" list or products that contain these substances and are deemed to release these substances into the natural environment during their business operations. A proposed list or targeted activities is included in Annex II.

13. The proposed threshold values for the Designated Chemical Substances and Targeted Activities follow the UNECE Protocol and the E-PRTR (166/2006 Regulation) provisions as a general guidance to be used by the Mediterranean countries. It is advisable to apply the relevant thresholds also for the non-EU countries in order to have a unified approach throughout the Mediterranean basin.

2.6 Responsibilities of the Competent Authorities

14. The competent authorities shall design, install, operate, maintain and update the PRTR system by allocating the necessary personnel, financial and organizational means as appropriate.

15. The competent authorities shall initially guide the industrial operators on their reporting obligations by preparing and disseminating the proper guidance documents.

16. The Secretariat prepared PRTR Regional Guidelines in 2015 and has updated the PRTR Implementation Guide for presentation to the Regional Meeting on Reporting of Releases to Marine and Coastal Environment from Land Based Sources Activities and related Indicators (Tirana, 19-20 March 2019). Both documents can be utilized by the countries as reference documents when preparing the national PRTR Regulation.

2.7 Reporting Obligations

17. The business/industry that undertakes one or more of the activities specified in Annex II above the applicable capacity thresholds specified, shall report the amounts annually to the competent authority, along with an indication of whether the information is based on measurement, calculation or estimation of the following:

- Releases to air, water and land of any pollutant specified in Annex I for which the applicable threshold value specified in Annex I is exceeded;
- Off-site transfers of hazardous waste exceeding 2 tons per year or of non-hazardous waste exceeding 2 000 tons per year for any operations of recovery or disposal;
- Off-site transfers of any pollutant specified in Annex I in wastewater destined for wastewater treatment for which the threshold value specified in Annex I, column 1b is exceeded.

18. The operator of each facility that undertakes one or more of the activities specified in Annex II above the applicable capacity thresholds specified therein shall communicate to its competent authority the information identifying the facility in accordance with the reporting format described in Annex III.

2.8 Information Required for PRTR Reporting

19. PRTR reporting requires two parts of information: (i) amount of release and (ii) amount of transfer:

- Amount of release: Release into atmosphere, release into public bodies of water, release into soil within the place, and reclamation within the place of business concerned.
- Amount of transfer: Transfer to sewage and transfer to outside of place of business concerned as a waste.

20. In the case reported data is based on calculation, the analytical method and/or the method of calculation shall be reported.

21. A reporting template is included in Annex III.

2.9 Information Disclosure

22. PRTR data provided by individual business facilities are disclosed by public announcement by the Government as well as being disclosed on request. The data from individual business facilities as well as national data are disclosed on a designated PRTR website. The PRTR Regulation shall make provisions to facilitate public access to disclosed data and information.

23. If an operator of a facility has justifiable reasons that specific information concerning releases or off-site transfers should be kept confidential, he has to inform the competent authorities and justify this decision. The authorities have to approve which data has to be kept confidential.

24. A request for access to the information contained in PRTR may be refused if:

- The confidentiality of commercial and/or industrial information can be endangered;
- Intellectual property rights (e.g. production technologies) do not allow the dissemination of such an information;
- The information contained in the PRTR system is still on a preliminary stage or has not yet been verified and officially accepted;
- Juridical measures are in progress where any provision of information can affect their processing.

2.10 Financial Sanctions and Penalties

25. The facility's operators may be subject of penalties in case of:

- Non-submission or delay of submission of an annual report on the releases according to reporting obligations;
- Non-maintenance of monitoring records further to permitting of facility;
- Violation of environmental conditions stated in the relevant permit concerning the content of the reports to be delivered without justification of the reasons;
- Failure to provide information about the method for data collection (measured, calculated, estimated); and
- No response to requirements imposed by the competent authorities concerning additional information and/or clarifications to submitted data.

Annex I
List of Designated Chemical Substances

No	CAS number	Pollutant (1)	Threshold for releases (column 1)		
			to air (column 1a) kg/year	to water (column 1b) kg/year	to land (column 1c) kg/year
1	74-82-8	Methane (CH_4)	100 000	— (2)	—
2	630-08-0	Carbon monoxide (CO)	500 000	—	—
3	124-38-9	Carbon dioxide (CO_2)	100 million	—	—
4		Hydro-fluorocarbons (HFCs) (3)	100	—	—
5	10024-97-2	Nitrous oxide (N_2O)	10 000	—	—
6	7664-41-7	Ammonia (NH_3)	10 000	—	—
7		Non-methane volatile organic compounds (NMVOC)	100 000	—	—
8		Nitrogen oxides (NO_x/NO_2)	100 000	—	—
9		Perfluorocarbons (PFCs) (4)	100	—	—
10	2551-62-4	Sulphur hexafluoride (SF_6)	50	—	—
11		Sulphur oxides (SO_x/SO_2)	150 000	—	—
12		Total nitrogen	—	50 000	50 000
13		Total phosphorus	—	5 000	5 000
14		Hydrochlorofluorocarbons(HCFCs) (5)	1	—	—
15		Chlorofluorocarbons (CFCs) (6)	1	—	—
16		Halons (7)	1	—	—
17		Arsenic and compounds (as As) (8)	20	5	5
18		Cadmium and compounds (as Cd) (8)	10	5	5
19		Chromium and compounds (as Cr) (8)	100	50	50
20		Copper and compounds (as Cu) (8)	100	50	50
21		Mercury and compounds (as Hg) (8)	10	1	1
22		Nickel and compounds (as Ni) (8)	50	20	20
23		Lead and compounds (as Pb) (8)	200	20	20
24		Zinc and compounds (as Zn) (8)	200	100	100
25	15972-60-8	Alachlor	—	1	1
26	309-00-2	Aldrin	1	1	1
27	1912-24-9	Atrazine	—	1	1
28	57-74-9	Chlordane	1	1	1

No	CAS number	Pollutant (1)	Threshold for releases (column 1)		
			to air (column 1a) kg/year	to water (column 1b) kg/year	to land (column 1c) kg/year
29	143-50-0	Chlordecone	1	1	1
30	470-90-6	Chlorfenvinphos	—	1	1
31	85535-84-8	Chloro-alkanes, C_{10}-C_{13}	—	1	1
32	2921-88-2	Chlorpyrifos	—	1	1
33	50-29-3	DDT	1	1	1
34	107-06-2	1,2-dichloroethane (EDC)	1 000	10	10
35	75-09-2	Dichloromethane (DCM)	1 000	10	10
36	60-57-1	Dieldrin	1	1	1
37	330-54-1	Diuron	—	1	1
38	115-29-7	Endosulphan	—	1	1
39	72-20-8	Endrin	1	1	1
40		Halogenated organic compounds (as AOX) (9)	—	1 000	1 000
41	76-44-8	Heptachlor	1	1	1
42	118-74-1	Hexachlorobenzene (HCB)	10	1	1
43	87-68-3	Hexachlorobutadiene (HCBD)	—	1	1
44	608-73-1	1,2,3,4,5,6- hexachlorocyclohexane(HCH)	10	1	1
45	58-89-9	Lindane	1	1	1
46	2385-85-5	Mirex	1	1	1
47		PCDD + PCDF (dioxins + furans) (as Teq) (10)	0,0001	0,0001	0,0001
48	608-93-5	Pentachlorobenzene	1	1	1
49	87-86-5	Pentachlorophenol (PCP)	10	1	1
50	1336-36-3	Polychlorinated biphenyls (PCBs)	0,1	0,1	0,1
51	122-34-9	Simazine	—	1	1
52	127-18-4	Tetrachloroethylene (PER)	2 000	10	—

No	CAS number	Pollutant (1)	Threshold for releases (column 1)		
			to air (column 1a) kg/year	to water (column 1b) kg/year	to land (column 1c) kg/year
53	56-23-5	Tetrachloromethane (TCM)	100	1	—
54	12002-48-1	Trichlorobenzenes (TCBs) (all isomers)	10	1	—
55	71-55-6	1,1,1-trichloroethane	100	—	—
56	79-34-5	1,1,2,2-tetrachloroethane	50	—	—
57	79-01-6	Trichloroethylene	2 000	10	—
58	67-66-3	Trichloromethane	500	10	—
59	8001-35-2	Toxaphene	1	1	1
60	75-01-4	Vinyl chloride	1 000	10	10
61	120-12-7	Anthracene	50	1	1
62	71-43-2	Benzene	1 000	200 (as BTEX) (11)	200 (as BTEX) (11)
63		Brominated diphenylethers (PBDE) (12)	—	1	1
64		Nonylphenol and Nonylphenol ethoxylates (NP/NPEs)	—	1	1
65	100-41-4	Ethyl benzene	—	200 (as BTEX) (11)	200 (as BTEX) (11)
66	75-21-8	Ethylene oxide	1 000	10	10
67	34123-59-6	Isoproturon	—	1	1
68	91-20-3	Naphthalene	100	10	10
69		Organotin compounds (as total Sn)	—	50	50
70	117-81-7	Di-(2-ethyl hexyl) phthalate (DEHP)	10	1	1
71	108-95-2	Phenols (as total C) (13)	—	20	20
72		Polycyclic aromatic hydrocarbons (PAHs) (14)	50	5	5
73	108-88-3	Toluene	—	200 (as BTEX) (11)	200 (as BTEX) (11)
74		Tributyltin and compounds (15)	—	1	1
75		Triphenyltin and compounds (16)	—	1	1
76		Total organic carbon (TOC) (as total C or COD/3)	—	50 000	—
77	1582-09-8	Trifluralin	—	1	1
78	1330-20-7	Xylenes (17)	—	200 (as BTEX) (11)	200 (as BTEX) (11)

No	CAS number	Pollutant (1)	Threshold for releases (column 1)		
			to air (column 1a) kg/year	to water (column 1b) kg/year	to land (column 1c) kg/year
79		Chlorides (as total Cl)	—	2 million	2 million
80		Chlorine and inorganic com- pounds (as HCl)	10 000	—	—
1	1332-21-4	Asbestos	1	1	1
82		Cyanides (as total CN)	—	50	50
83		Fluorides (as total F)	—	2 000	2 000
84		Fluorine and inorganic com- pounds (as HF)	5 000	—	—
85	74-90-8	Hydrogen cyanide (HCN)	200	—	—
86		Particulate matter (PM_{10})	50 000	—	—
87	1806-26-4	Octylphenols and Octylphenol ethoxylates	—	1	—
88	206-44-0	Fluoranthene	—	1	—
89	465-73-6	Isodrin	—	1	—
90	36355-1-8	Hexabromobiphenyl	0.1	0,1	0,1
91	191-24-2	Benzo(g,h,i)perylene		1	

(1) Unless otherwise specified any pollutant shall be reported as the total mass of that pollutant or, where the pollutant is a group of substances, as the total mass of the group.

(2) A hyphen (—) indicates that the parameter and medium in question do not trigger a reporting requirement.

(3) Total mass of hydrogen fluorocarbons: sum of HFC23, HFC32, HFC41, HFC4310mee, HFC125, HFC134, HFC134a, HFC152a, HFC143, HFC143a, HFC227ea, HFC236fa, HFC245ca, HFC365mfc.

(4) Total mass of perfluorocarbons: sum of CF_4, C_2F_6, C_3F_8, C_4F_{10}, c-C_4F_8, C_5F_{12}, C_6F_{14}.

(5) Total mass of substances including their isomers.

(6) Total mass of substances including their isomers.

(7) Total mass of substances including their isomers.

(8) All metals shall be reported as the total mass of the element in all chemical forms present in the release.

(9) Halogenated organic compounds which can be adsorbed to activated carbon expressed as chloride.

(10) Expressed as I-TEQ.

(11) Single pollutants are to be reported if the threshold for BTEX (the sum parameter of benzene, toluene, ethyl benzene, xylenes) is exceeded.

(12) Total mass of the following brominated diphenylethers: penta-BDE, octa-BDE and deca-BDE.

(13) Total mass of phenol and simple substituted phenols expressed as total carbon.

(14) Polycyclic aromatic hydrocarbons (PAHs) are to be measured for reporting of releases to air as benzo(a)pyrene (50-32-8), benzo(b)fluo- ranthene (205-99-2), benzo(k)fluoranthene (207-08-9), indeno(1,2,3-cd)pyrene (193-39-5).

(15) Total mass of tributyltin compounds, expressed as mass of tributyltin.

(16) Total mass of triphenyltin compounds, expressed as mass of triphenyltin.

(17) Total mass of xylene (ortho-xylene, meta-xylene, para-xylene).

Annex II
List of Targeted Activities

No	Activity	Capacity threshold
1.	Energy sector	
(a)	Mineral oil and gas refineries	*
(b)	Installations for gasification and liquefaction	*
(c)	Thermal power stations and other combustion installations	With a heat input of 50 megawatts (MW)
(d)	Coke ovens	*
(e)	Coal rolling mills	With a capacity of 1 tonne per hour
(f)	Installations for the manufacture of coal products and solid smokeless fuel	*
2.	Production and processing of metals	
(a)	Metal ore (including sulphide ore) roasting or sintering installations	*
(b)	Installations for the production of pig iron or steel (primary or secondary melting) including continuous casting	With a capacity of 2,5 tonnes per hour
(c)	Installations for the processing of ferrous metals: (i) Hot-rolling mills (ii) Smitheries with hammers (iii) Application of protective fused metal coats	With a capacity of 20 tonnes of crude steel per hour With an energy of 50 kilojoules per hammer, where the calorific power used exceeds 20 MW With an input of 2 tonnes of crude steel per hour
(d)	Ferrous metal foundries	With a production capacity of 20 tonnes per day
(e)	Installations: (i) For the production of non-ferrous crude metals from ore, concentrates or secondary raw materials by metallurgical, chemical or electrolytic processes (ii) For the smelting, including the alloying, of non-ferrous metals, including recovered products (refining, foundry casting, etc.)	* With a melting capacity of 4 tonnes per day for lead and cadmium or 20 tonnes per day for all other metals
(f)	Installations for surface treatment of metals and plastic materials using an electrolytic or chemical process	Where the volume of the treatment vats equals 30 m^3
3.	Mineral industry	
(a)	Underground mining and related operations	*
(b)	Opencast mining and quarrying	Where the surface of the area effectively under extractive operation equals 25 hectares
(c)	Installations for the production of: (i) Cement clinker in rotary kilns (ii) Lime in rotary kilns (iii) Cement clinker or lime in other furnaces	With a production capacity of 500 tonnes per day With a production capacity of 50 tonnes per day With a production capacity of 50 tonnes per day
(d)	Installations for the production of asbestos and the manufacture of asbestos-based products	*
(e)	Installations for the manufacture of glass, including glass fibre	With a melting capacity of 20 tonnes per day

No	Activity	Capacity threshold
(f)	Installations for melting mineral substances, including the production of mineral fibres	With a melting capacity of 20 tonnes per day
(g)	Installations for the manufacture of ceramic products by firing, in particular roofing tiles, bricks, refractory bricks, tiles, stoneware or porcelain	With a production capacity of 75 tonnes per day, or with a kiln capacity of 4 m3 and with a setting density per kiln of 300 kg/m3
4. (a)	Chemical industry Chemical installations for the production on an industrial scale of basic organic chemicals, such as: (i) Simple hydrocarbons (linear or cyclic, saturated or unsaturated, aliphatic or aromatic) (ii) Oxygen-containing hydrocarbons such as alcohols, aldehydes, ketones, carboxylic acids, esters, acetates, ethers, peroxides, epoxy resins (iii) Sulphurous hydrocarbons (iv) Nitrogenous hydrocarbons such as amines, amides, nitrous compounds, nitro compounds or nitrate com- pounds, nitriles, cyanates, isocyanates (v) Phosphorus-containing hydrocarbons (vi) Halogenic hydrocarbons (vii) Organometallic compounds (viii) Basic plastic materials (polymers, synthetic fibres and cellulose-based fibres) (ix) Synthetic rubbers (x) Dyes and pigments (xi) Surface-active agents and surfactants	*
(b)	Chemical installations for the production on an industrial scale of basic inorganic chemicals, such as: (i) Gases, such as ammonia, chlorine or hydrogen chloride, fluorine or hydrogen fluoride, carbon oxides, sulphur com- pounds, nitrogen oxides, hydrogen, sulphur dioxide, carbonyl chloride (ii) Acids, such as chromic acid, hydrofluoric acid, phosphoric acid, nitric acid, hydrochloric acid, sulphuric acid, oleum, sulphurous acids (iii) Bases, such as ammonium hydroxide, potassium hydroxide, sodium hydroxide (iv) Salts, such as ammonium chloride, potassium chlorate, potassium carbonate, sodium carbonate, perborate, silver nitrate (v) Non-metals, metal oxides or other inorganic compounds such as calcium carbide, silicon, silicon carbide	*
(c)	Chemical installations for the production on an industrial scale of phosphorous-, nitrogen- or potassium-based fertilisers (simple or compound fertilisers)	*
(d)	Chemical installations for the production on an industrial scale of basic plant health products and of biocides	*
(e)	Installations using a chemical or biological process for the production on an industrial scale of basic pharmaceutical products	*
(f)	Installations for the production on an industrial scale of explosives and pyrotechnic products	*

No	Activity	Capacity threshold
5.	Waste and wastewater management	
(a)	Installations for the recovery or disposal of hazardous waste	Receiving 10 tonnes per day
(b)	Installations for the incineration of non-hazardous waste	With capacity of 3 tonnes per hour
(c)	Installations for the disposal of non-hazardous waste	With a capacity of 50 tonnes per day
(d)	Landfills	Receiving 10 tonnes per day or with a total capacity of 25 000 tonnes
(e)	Installations for the disposal or recycling of animal carcasses and animal waste	With a treatment capacity of 10 tonnes per day
(f)	Urban waste-water treatment plants	With a capacity of 100000 population equivalents
(g)	Independently operated industrial waste-water treatment plants which serve one or more activities of this annex	With a capacity of 10 000 m3 per day (4)
6.	Paper and wood production and processing	
(a)	Industrial plants for the production of pulp from timber or similar fibrous materials	*
(b)	Industrial plants for the production of paper and board and other primary wood products (such as chipboard, fibreboard and plywood)	With a production capacity of 20 tonnes per day
(c)	Industrial plants for the preservation of wood and wood products with chemicals	With a production capacity of 50 m3 per day
7.	Intensive livestock production and aquaculture	
(a)	Installations for the intensive rearing of poultry or pigs	(i) With 40 000 places for poultry (ii) With 2 000 places for production pigs (over 30 kg) (iii) With 750 places for sows
(b)	Intensive aquaculture	With a production capacity of 1 000 tonnes of fish or shellfish per year
No	Activity	Capacity threshold
8.	Animal and vegetable products from the food and beverage sector	
(a)	Slaughterhouses	With a carcass production capacity of 50 tonnes per day
(b)	Treatment and processing intended for the production of food and beverage products from: (i) Animal raw materials (other than milk) (ii) Vegetable raw materials	With a finished product production capacity of 75 tonnes per day With a finished product production capacity of 300 tonnes per day (average value on a quarterly basis)
(c)	Treatment and processing of milk	With a capacity to receive 200 tonnes of milk per day (average value on an annual basis)
9.	Other activities	
(a)	Plants for the pre-treatment (operations such as washing, bleaching, mercerisation) or dyeing of fibres or textiles	With a treatment capacity of 10 tonnes per day

No	Activity	Capacity threshold
(b)	Plants for the tanning of hides and skins	With a treatment capacity of 12 tonnes of finished product per day
(c)	Installations for the surface treatment of substances, objects or products using organic solvents, in particular for dressing, printing, coating, degreasing, waterproofing, sizing, painting, cleaning or impregnating	With a consumption capacity of 150 kg per hour or 200 tonnes per year
(d)	Installations for the production of carbon (hard-burnt coal) or electro-graphite by means of incineration or graphitisation	*
(e)	Installations for the building of, and painting or removal of paint from ships	With a capacity for ships 100 m long

*No threshold (any capacity)

Annex III
Reporting Format

Reference year		
Identification of the facility		
Name of the parent company Name of the facility Identification number of facility Street address Town Postal code Country Coordinates of the location River basin district NACE-code (4 digits) Main economic activity Production volume (optional) Number of installations (optional) Number of operating hours in year (optional) Number of employees (optional) Text field for textual information or website address delivered by facility or parent company (optional)		
All Annex I activities of the facility		
Activity 1 (main activity) Activity 2 Activity N		
Release data to air for the facility for each pollutant exceeding threshold value (according to Annex II)		**Releases to air**
Pollutant 1 Pollutant 2 Pollutant N	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	T: Total in kg/year A: accidental in kg/year
Technical measures	Type	Reduction of pollutants

Release data to water for the facility for each pollutant exceeding threshold value (according to Annex II)		**Releases to water**
Pollutant 1 Pollutant 2 Pollutant N	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	T: Total in kg/year A: accidental in kg/year
Technical measures	Type	Reduction of pollutants
Release data to land for the facility for each pollutant exceeding threshold value (according to Annex II)		**Releases to land**
Pollutant 1 Pollutant 2 Pollutant N	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	T: Total in kg/year A: accidental in kg/year
Technical measures	Type	Reduction of pollutants

Off-site transfer of each pollutant destined for wastewater treatment in quantities exceeding threshold value (according to Annex II)		
Pollutant 1 Pollutant 2 Pollutant N	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	in kg/year
Off-site transfers of hazardous waste for the facility exceeding 2 tonnes/year		
Within the country: For Recovery (R)	M: measured; Analytical Method used C: calculated; Calculation Method used	in tonnes/year
Within the country: For Disposal (D)	M: measured; Analytical Method used C: calculated; Calculation Method used	in tonnes/year
To other countries: For Recovery (R) Name of the recoverer Address of the recoverer Address of actual recovery site receiving the transfer	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	in tonnes/year
To other countries: For Disposal (D) Name of the disposer Address of the disposer Address of actual disposal site receiving the transfer	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	in tonnes/year
Off-site transfer of non-hazardous waste for the facility exceeding 2000 tonnes/year		
For Recovery (R)	M: measured; Analytical Method used C: calculated; Calculation Method used	in tonnes/year
For Disposal (D)	M: measured; Analytical Method used C: calculated; Calculation Method used E: estimated	in tonnes/year