STRUCTURING A NATIONAL PRTR PROPOSAL

2020 | Series 4

Welcome to UNITAR's Guidance Series for Implementing a National Pollutant Release and Transfer Register (PRTR) Design Project

Based on the lessons learned through ongoing activities supporting PRTR development world-wide, UNITAR has developed the following documents in a guidance series intended to facilitate the design and implementation of Pollutant Release and Transfer Registers (PRTRs):

• Implementing a National PRTR Design Project: A Guidance Document
• Series 1: Preparing a National PRTR Infrastructure Assessment
• Series 2: Designing the Key Features of a National PRTR System
• Series 3: Implementing a PRTR Pilot Reporting
• **Series 4: Structuring a National PRTR Proposal**
• Series 5: Addressing Industry Concerns Related to PRTRs
• Series 6: Guidance for Facilities on PRTR Data Estimation and Reporting
• Series 7: Guidance on Estimating Non-Point Source Emissions

To access **additional resources** on various aspects of PRTR design and implementation, see:

UNITAR's PRTR Platform highlights the activities of the UNITAR Chemicals and Waste Management Programme in support of the implementation of PRTRs. The site includes a library of Resources from UNITAR and other international organizations focused on supporting the development of PRTRs. The PRTR Platform also provides access to video training modules on different aspects of the development and implementation of national PRTRs through PRTR:Learn http:prtr.unitar.org

For additional information, please contact:
Chemicals and Waste Management Programme
United Nations Institute for Training and Research (UNITAR)
email: cwm@unitar.org

Table of Contents

List of Acronyms

CAS	Chemical Abstract Service Number
NCT	National Coordinating Team
PRTR	Pollutant Release and Transfer Register
UNITAR	United Nations Institute for Training and Research

1 Introduction

This guide is the fourth in a series of supplements to the main guidance document in the UNITAR Guidance Series for Implementing a National PRTR Design Project (2018). The guidance series provides countries with a suggested step-wise approach for undertaking the design of a national PRTR system. The documents in this series provide in-depth guidance on UNITAR's suggested approach for implementing a national PRTR design project. The guidance is not meant to be prescriptive and should be adapted by countries in a flexible manner according to their specific needs and circumstances.

The six suggested stages of a national PRTR design project are the following:

Stage 1: Identifying the Goals of the National PRTR System

Stage 2: Assessing the Existing Infrastructure Relevant to a National PRTR

Stage 3: Designing the Key Features of a National PRTR System

Stage 4: Conducting a PRTR Pilot Reporting

Stage 5: Finalizing the National PRTR Proposal

Stage 6: Organizing a National PRTR Implementation Workshop

This document provides specific guidance on implementing Stage 5 of the suggested PRTR design process; it addresses the preparation of a National PRTR Proposal. The following sections provide an overview and suggested structure of the National PRTR Proposal, including a sample table of contents. The final section of this document provides some important issues that the National Coordinating Team (NCT) should consider in preparing the final National PRTR Proposal.

OVERVIEW AND OBJECTIVES OF THE NATIONAL PRTR PROPOSAL

2 Overview And Objectives of the National PRTR Proposal

The purpose of the National PRTR Proposal is to present the complete specifications for all technical, administrative, institutional, and legal elements of the national PRTR system, as developed by the NCT throughout the national PRTR design project. Once completed, the National PRTR Proposal should be presented for final approval by decision makers at the national level, followed by implementation of the national PRTR.
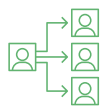
A National PRTR Proposal should provide detailed information on the following aspects of PRTR design and operation:

Legal Foundation: The proposal should include a complete scheme for the legal implementation of the national PRTR. It should document the interpretation of current legislation under which the national PRTR might operate and provide a proposal for any new regulation or law that will need to be considered.

Technical Design: The proposal should provide details of all technical features of the PRTR system including: the list of substances; the thresholds and criteria for reporting; the data elements to be collected; the reporting format; reporting schedule; all aspects of data estimation; and data management, including the online data collection system, if one is planned; the design of the PRTR database; and all other PRTR design specifications and details.

Institutional and Administrative Responsibilities: The proposal should clearly outline the specific roles and responsibilities for the operation of the system such as which agency will host and maintain the PRTR database, which agencies will undertake data collection, and which agencies and staff will be responsible for data storage and processing, information dissemination and providing access to the PRTR data.

National Implementation of the PRTR System: The proposal should cover all aspects of implementation, including the time frame for execution of the first cycle of PRTR reporting, and all responsibilities and actions to be taken by involved agencies and staff.

Suggested Contents of a National PRTR Proposal

Section 1: Introduction

Section 2: Goals of the National PRTR System

Section 3: Legal Implementation of the National PRTR System

Section 4: Reporting Requirements and Data Estimation Procedures for Point Sources of Emissions

Section 5: Estimation of Emissions from Non-Point Sources and Non-Reporting Point Sources (if applicable)

Section 6: PRTR Data Management System

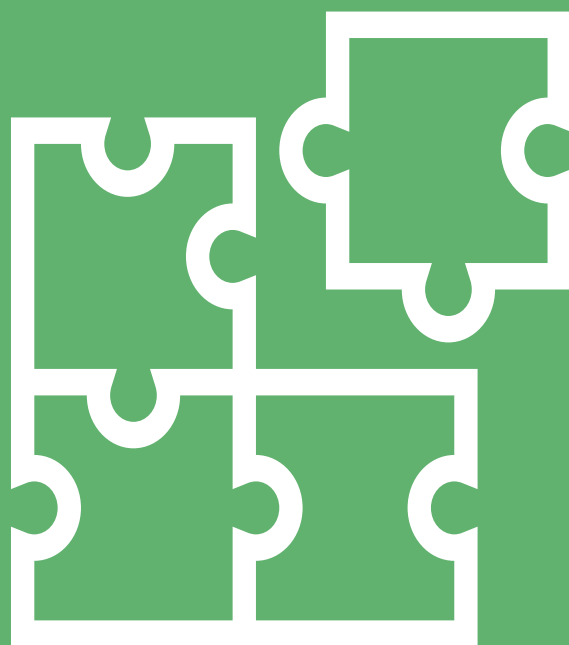Section 7: Administration of the National PRTR System

Section 8: National Implementation Work Plan

Section 9: Review Procedures

Section 10: Recommendations for Further Development of the PRTR System

SUGGESTED STRUCTURE FOR THE NATIONAL PRTR PROPOSAL

3 Suggested Structure for the National PRTR Proposal

The following is a suggested outline for a National PRTR Proposal, which may serve as a useful starting point for a table of contents for the final document. It is intended only as a guide: the National Coordinating Team will probably find it necessary to include additional elements or delete others, depending on the nature of the national PRTR system to be developed.

1. INTRODUCTION

2. OBJECTIVES OF THE NATIONAL PRTR SYSTEM

3. LEGAL IMPLEMENTATION OF THE NATIONAL PRTR SYSTEM

3.1 New or existing regulations and legislation under which the PRTR system will operate

3.2 Schedule for development of the requisite legislation

a. Current environmental data reporting requirements to be replaced, modified, or integrated with the PRTR reporting scheme

b. Enforcement procedures for late or missing reporters out of compliance

4. REPORTING REQUIREMENTS AND PROCEDURES FOR POINT SOURCES OF EMISSIONS

4.1 Definition of technical terms

Note: All terms used in the context of the national PRTR proposal should be clearly defined, in particular those related to the chemical/pollutant waste streams to be reported (e.g. emissions, releases, transfers, units of reporting, facility, production unit, amounts generated, processed, consumed, otherwise used, etc.)

4.2 List of substances subject to PRTR reporting

4.2.1 The PRTR list of substances

4.2.2 Procedures for reviewing, adding, or deleting substances from the PRTR list

4.3 Criteria and thresholds that trigger PRTR reporting by facilities/emissions sources

4.4 Facilities or sources exempted from PRTR reporting

4.5 Management of confidentiality claims

4.5.1 Procedures for filing, reviewing and granting/denying confidentiality claims

4.5.2 Procedures for entry of generic

4.6 Data elements to be reported

4.6.1 Facility specific data elements

• Company name/Site name;

• Location (physical address) of the plant site;

• International Standard Industrial Classification of All Economic Activities (ISIC) or other industrial sector classification;

• Number of employees;

• Name/telephone number/email/address of facility contact person;

• Name and signature of a plant executive or other high-level company official.

4.6.2 Chemical specific data elements

• Identification of the substance using common name and Chemical Abstract Service (CAS) number or other standard chemical classification);

• On-site emissions/discharges to air, water, land (specify units of measurement);

• Off-site transfers (specify units of measurement) and quantities recycled, recovered, treated, and/or finally disposed including identification of the receiving locations);

• Accidental releases to air, water, land;

• Explanations of changes in quantities emitted/released or transferred since the previous report;

• Anticipated or planned reductions in quantities emitted or transferred.

4.7 Emissions Estimation Methods

4.7.1 Acceptable procedures for estimating emissions

4.8 Assistance or support provided to reporting facilities

4.8.1 Information, instructions, guidance documents, and training activities for reporting industry;

4.8.2 Deadline for annual reporting;

4.8.3 Assistance and services (e.g. CRM tool) to be provided during the first reporting cycle.

5. TREATMENT OF NON-POINT AND NON-REPORTING POINT SOURCES OF EMISSIONS

Note: These sources include run-off from agricultural activities, transportation emissions, small and medium industries from which PRTR reporting is impractical/unrealistic, etc.

5.1 Definitions of non-point, diffuse, and non-reporting sources

5.2 Procedures for estimating emissions/releases from non-point, diffuse, or non-reporting point sources

5.3 Procedures and format for including these emissions estimates in the general PRTR database

6. PRTR DATA CAPTURE AND DATA MANAGEMENT SYSTEM

6.1 Specifications for the PRTR system

6.1.1 Data capture mechanism (standalone online system vs. single-window online vs. offline (e.g., Excel-based submissions)

6.1.2 User interface

6.1.3 Embedded data quality checks

6.1.4 Certification and revision functions

6.2 Hardware requirements and configuration for the PRTR database

7. ADMINISTRATION OF THE NATIONAL PRTR SYSTEM

7.1 Institutional responsibilities for data collection and management

7.1.1 Specification of procedures and agencies responsible for:

- *Data collection;*

- *Data verification and quality check;*

- *Error correction;*

- *Support/assistance services for data estimation;*

- *Customer Relation Management (CRM) tool to track and assist reporting facilities;*

- *Database maintenance.*

7.1.2 Staffing and training needs for the operation of data collection and management procedures

7.1.3 Information infrastructure and budget requirements for the operation of data collection and management procedures

7.2 Institutional responsibilities for data analysis and dissemination

7.2.1 Specification of procedures and agencies responsible for:

- *Data aggregation;*

- *Data analysis;*

- *Data access and dissemination;*

- *Data use and applications.*

7.2.2 Data access and dissemination mechanisms

- *Data distribution/access mechanisms (e.g. downloads, published analyses and web-based tools);*

- *Specifications for annual PRTR report and publication timelines.*

7.2.3 Staffing and training needs for data analysis and dissemination procedures

7.2.4 Information infrastructure and budget requirements for data analysis and dis semination procedures

7.3 Coordination and enforcement of the national PRTR system

• Coordination mechanism among agencies involved in the operation of the PRTR system;
• Enforcement provisions.

8. NATIONAL IMPLEMENTATION WORK PLAN

8.1 Preparatory activities

• Installation of the required information infrastructure;

• Distribution of reporting materials, instructions, and data estimation guides;

• Operating support/assistance services for reporting facilities;

• Training of government staff on all aspects of PRTR operation.

8.2 Activities in preparation for the first PRTR reporting cycle

• *Agenda of operations for data collection, management, analysis, dissemination and publication of results.*

9. REVIEW PROCEDURES

9.1 Responsibilities, schedule, and procedures for periodic review and update of the national PRTR system

10. RECOMMENDATIONS FOR FURTHER DEVELOPMENT OF THE PRTR SYSTEM

10.1 Additional elements to be phased into the PRTR system

10.2 Possible additional applications/uses of the PRTR system

COMPLETING THE NATIONAL PRTR PROPOSAL

4 Completing the National PRTR Proposal

It is suggested that a working group composed of individuals who have been in close contact with the NCT throughout the design process be appointed to oversee the preparation of the National PRTR Proposal. Ideally, the National Coordinating Team will have already produced a preliminary draft of each of the sections of the National PRTR Proposal in the course of the PRTR design and with input from stakeholder consultations undertaken during the national PRTR design project. If these preliminary drafts do not yet exist, the group will need to ensure that all recommendations and decisions generated by the National Coordinating Team during the PRTR design project are collected and reflected in draft chapters as appropriate. For practical reasons it might be useful to assign the drafting of certain sections of the proposal to members of the National Coordinating Team who have specific expertise. For example, the legal implementation specifications might be written by a lawyer, the database specifications by an expert on computer systems and the hosting ministry's information architecture. The various draft chapters should then be assembled into a draft National PRTR Proposal document.

The National Coordinating Team should supervise the drafting process and carefully review its results to ensure that the document accurately captures all of the recommendations and PRTR design elements as agreed by the members of the National Coordinating Team.

The success of the National PRTR Proposal depends on the degree to which it receives the endorsement of key authorities as well as the level of support generated among the national stakeholders with interests in the proposed PRTR system. Given the need for high-level support for developing the National PRTR Proposal, the NCT should ensure that key authorities, such as the high-level decision makers in the various ministries or agencies that will be involved in the operation of the PRTR, as well as other political or scientific figures whose support could be instrumental to the successful implementation of the proposal, are kept informed and involved, as appropriate. To ensure that key stakeholders are well aware of the content of the PRTR Proposal before its final publication, the preliminary draft should be circulated among relevant ministries and parties.

Sources

Icons:

Page 6 - Synopsis icon by Berkah Icon from the Noun Project
Page 7 - Balance icon made by Monkik
Page 7 - Rulers icon by Luca Fruzza from the Noun Project
Page 7 - Organizational chart icon by Juan Pablo Bravo from the Noun Project
Page 7 - System icon by Nithinan Tatah from the Noun Project
Page 9 - Structure icon by lastspark from the Noun Project
Page 15 - Proposal icon by Fiki Ahmadi from the Noun Project