

Reporting questionnaire on implementation of E-PRTR Regulation according to Decision 2010/205/EU and additional voluntary questions

Reporting country	IE
Questionnaire type	A - mandatory + voluntary questions
Reporting language	en

1. GENERAL DESCRIPTION

Provide brief information on the process by which this report has been prepared, including information on the type of public authorities that have contributed. (mandatory question)

This report has been prepared by the Environmental Protection Agency (EPA) of Ireland, as the Competent Authority for Ireland's PRTR. The EPA has been given responsibility for collecting, validating and reporting PRTR data as well as providing the associated information technology (IT) requirements and implementation of the legislation.

The EPA made a draft of this report available to the Department of Environment, Community and Local Government (DECLG) in Ireland for their comment, and comments received were subsequently considered in preparation of this report.

1.a How was the public consulted and how was the outcome of the public consultation taken into account? (voluntary question)

- A draft of this report was made available from August 12th to 29th 2014 on the PRTR section of the EPA's website (at the following links: <http://www.epa.ie/enforcement/prtr/>; Further Information: <http://www.epa.ie/enforcement/prtr/links/>; and Operator Information: <http://www.epa.ie/enforcement/prtr/operator/>).
- A notice was put on the EPA website inviting comments from the public on the draft report.
- All PRTR reporters were invited to comment via email.
- No comments on the draft report were received from the public.

1.b What information was used as a basis for preparing the report? (voluntary question)

The EPA's experience in implementing the E-PRTR Regulations informed the preparation of this report. Reports such as the previous reporting questionnaire (2007-2009) and a report prepared by the Department of Environment, Community and Local Government (DECLG) in 2013 on implementation of the UNECE PRTR Protocol were also consulted (For information on the UNECE PRTR Protocol, see: <http://www.unece.org/env/pp/prtr.html>). As mentioned above, a draft of this report was also made available to the DECLG, PRTR reporters and the public for comment.

2. LEGAL MEASURE ESTABLISHING THE PRTR SYSTEM (ARTICLES 5, 20)

List legislative, regulatory and other measures establishing the integrated pollutant release and transfer register.(mandatory question)

Regulation (EC) No. 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC has been signed into Irish Law through the following regulations:

- European Communities (European Pollutant Release and Transfer Register) Regulations 2007 (S.I. No. 123 of 2007), and
- Pollutant Release and Transfer Register Regulations 2011 (S.I. No. 649 of 2011).

Since the coming into force of the E-PRTR Regulations in March 2007, there is an obligation on EPA-licensed facilities, and on operators in certain other industrial sectors that carry out PRTR activities above relevant applicable capacity thresholds (specified in Schedule 1), to make PRTR returns. These returns are in the form and content specified by the EPA and cover annual releases (emissions) and off-site waste transfers for each calendar year which must be reported by 31st March of the following year.

The 2011 Pollutant Release and Transfer Register (PRTR) Regulations, available at <http://www.irishstatutebook.ie/2011/en/si/0649.html>, came into effect in December 2011 with the purpose of establishing an Irish pollutant release and transfer register in the form of a publicly-accessible electronic database. These Regulations lay down rules for the functioning of the register, in order to give effect to the United Nations Economic Commission for Europe (UNECE) Protocol on Pollutant Release and Transfer Registers.

The 2011 PRTR Regulations designate the Environmental Protection Agency as Competent Authority for the purposes of the Irish PRTR (Regulation 4) and assign functions relating to the design and structure of the register to the EPA (Regulation 6). Reporting obligations are placed on both operators (Regulation 7) and the EPA (Regulation 9). The Regulations provide for quality assurance of data and assessment (Regulation 10), access to information (Regulation 11, 14), confidentiality (Regulation 12), public participation (Regulation 13) and awareness raising (Regulation 16). They also provide for penalties (Regulation 17).

2.a In particular describe measures adopted Member States according to the provisions of Article 20 to ensure that the rules on penalties are effective, proportionate and dissuasive and what was the experience of their application. (mandatory question)

Regulation 17 of the 2011 PRTR Regulations outlines that “A person who fails to comply with his or her obligations under these Regulations shall be guilty of an offence within the meaning of section 8 of the Act of 1992 and shall be liable to the penalties laid down in

section 9(a) of the said Act”. (Note: “Act of 1992” refers to Ireland’s Environmental Protection Agency Act 1992).

In addition, any PRTR reporters that also have operating licences issued by the EPA can be issued with a ‘non-compliance’ for not reporting their PRTR data (where PRTR reporting is a condition of their licence). As the operating licence is a legal document, such facilities could be prosecuted under their EPA licence for not reporting. Non compliances can result in an increase in facility charges payable to the EPA. The EPA has previously issued non-compliances for non-reporting. In general, the issuing of reporting reminders and warnings results in completion of reporting tasks.

2.ai How has the provision of Article 7(1) - regarding the date by which operators shall provide the data referred to in Article 5(1) and (2) - been implemented by the Member State? (voluntary question)

The provision of Article 7 has been written into the 2011 Irish PRTR Regulations (Regulation 7). This requires that operators shall, not later than 31st March in each year, report to the EPA releases of pollutants and off-site transfers of pollutants and waste in respect of the preceding calendar year.

In addition, PRTR reporting has been incorporated into the Annual Environmental Reporting (AER) system for EPA-licensed facilities, with both PRTR and AER returns due by 31st March each year. The exception to this are the licensed urban waste water treatment plants (uWWTPs) which are required to submit their AER and PRTR returns by 28th February each year.

2.a.ii Where relevant list also any additional measures taken in order to establish a national PRTR system. (voluntary question)

The EPA has established the national PRTR system as follows:

- A dedicated section on the EPA website with guidance (both general and sector-specific) for reporters has been provided.
- The EPA has provided calculation tools for uWWTPs, Quarries and Intensive Agriculture facilities to assist reporters to complete their PRTR returns to the EPA.
- The EPA emails reporters prior to the annual reporting deadline to remind them of their reporting obligations and provide them with login details to the EPA reporting website.
- The reporters can download a facility-specific Excel workbook to complete their PRTR return (by filling in emissions to Air, Water, Waste Water and Waste Transfers). The reporter converts their completed workbook to an XML file and uploads this electronically via the EPA website.
- The EPA has developed an internal PRTR software application which is used to manage, analyse and report the PRTR data collected since 2007.
- Reports are extracted from the PRTR application and used to validate facilities by their activity sector in order to check the reported data for completeness, consistency and credibility.
- The national PRTR website was made available in October 2011 at <http://prtr.epa.ie/> to

provide public access to PRTR data reported by Ireland to the European Commission. The website has a search and mapping function (<http://www.epa.ie/enforcement/prtr/map/>) and the maps can also be accessed at the EPA Maps section of the website (<http://gis.epa.ie/SeeMaps>).

2.b Measures taken to maintain or introduce more extensive or more publicly accessible PRTR. (voluntary question)

- The national PRTR website was made available in October 2011 at <http://prtr.epa.ie/>, providing information about PRTR and a user-friendly map allowing the PRTR data to be searched by industrial sector, facility name, pollutant, river basin district, or location. There was a press release when the website was launched to inform the public that it was available on-line and what information it contained ('EPA launches map-based website to enhance public access to information on pollutants' released October 2011, available at: <http://www.epa.ie/newsandevents/news/previous/2011/name,47803,en.html>).
- The EPA also issued press releases when the 2007 to 2011 (inclusive) data sets were made available on the national website (see: <http://www.epa.ie/newsandevents/news/previous/>).
- For the 2012 data, the EPA prepared a report on the E-PRTR data, which has been published to the EPA's website at: <http://www.epa.ie/pubs/advice/aerprtr/prtr/e-prtrnationalreport2012.html>
- The EPA requires that licensed facilities include a copy of their PRTR return in their annual environmental report (AER). These AERs are saved as PDF files and are published on the EPA's website for public information, where they can be accessed through the 'search for licence/ permit' search facility at the following link: <http://www.epa.ie/terminalfour/ippc/index.jsp>

2.c Measures taken to ensure that employees of a facility and members of the public who report violations to public authorities are not penalized, persecuted or harassed for reporting the violation. (voluntary question)

The EPA's complaint system, 'Making an Environmental Complaint', provides for making complaints relating to the environment and allows individuals to have their details kept confidential.

In addition, Ireland's Protected Disclosures Act 2014 came into force in July 2014. The Act provides protections to workers who raise concerns regarding possible wrongdoing in their workplace.

2.d Level of integration of PRTR into other reporting mechanisms and the elimination of duplicative reporting. (voluntary question)

The obligation on operators to submit PRTR data to the EPA has been incorporated into the EPA's Integrated Pollution Control (IPC)/ Industrial Emissions (IE)/ Waste/ Wastewater Discharge (WWD) Authorisations licensing system.

It is a standard condition of any new or revised IPC/ IE/ Waste/ WWD licence that the licensee must prepare and report a PRTR return for the site. The licensee is obliged to prepare the PRTR report in accordance with any guidelines issued by the EPA and to submit the

report electronically in the specified format and as part of the Annual Environmental Report for the site.

The integration of PRTR reporting by operators into the IPC/ IE/ Waste/ WWD licensing systems meets both requirements for the purpose of monitoring emissions that arise under the IPC / IED Directive and reporting requirements under the PRTR Regulations, thus reducing duplicate reporting of information.

In addition, the single PRTR dataset submitted by the operator is used for Ireland's annual returns to the European-PRTR and the national dataset is used for various reports produced by the EPA (e.g. 'Focus on Environmental Enforcement in Ireland 2009-2012' <http://www.epa.ie/pubs/reports/enforcement/focusonenvironmental-enforcement-in-ireland-2009-2012.html>).

While duplicate reporting has not been eliminated completely, the EPA is developing systems that will further reduce/eliminate duplication. In particular, there is on-going business analysis within the organisation to streamline waste data collections with the aim of collecting the data once and using it to report for several reports.

2.di Has the Member State integrated the National PRTR system into other reporting mechanisms and what were the results of that integration? (voluntary question)

As outlined in 2d above, the PRTR system has been integrated into the Annual Environmental Reporting system for EPA-licensed facilities, with the same deadlines applicable to both (apart from the uWWTPs who report a month earlier than the IE/ IPC/ Waste deadline). This facilitates collection of the data by the EPA from relevant PRTR sectors, most of which are licensed facilities also. The results of the integration have been successful and have reduced resource requirements for collection of different sets of data with the same deadline.

2.e How release and transfer can be searched and identified (both in aggregate and non aggregate forms) in the national PRTR with respect to identification parameters listed in Article 4(1) and whether other parameters or search functionalities have been developed. (voluntary question)

The National PRTR website at <http://prtr.epa.ie/> was launched in 2011, and includes a user-friendly search and map function for public access to information.

The website has a section to explain how to use the search functions:

<http://www.epa.ie/enforcement/prtr/map/>. This section also explains the map tools and facility report.

The website has the options to search by pollutant release or waste transfer under the following headings:

- Year (currently a choice of 2007-2012, with the latest year set as the default year);
- River Basin District - RBD;
- County;
- Licence Number;

- Facility name;
- Sector (from a selection of 9 sectors in the drop down list);
- Pollutant.

(Please note that developments in 2014 have added searches by Media; Waste Type; Waste Transfer; and Treatment Operation).

2.f The universal resource locator (URL) or internet address where the register can be accessed or other electronic means with equivalent effect. (voluntary question)

The Irish PRTR is available at <http://www.epa.ie/enforcement/prtr/>.

2.g Links available and activated to relevant existing, publicly accessible database on subject matters related to environmental protection and to other PRTRs. (voluntary question)

The Irish PRTR website provides links to existing relevant information and databases (e.g. Irish, E-PRTR, international) listed below:

- The PRTR regulations S.I. No. 123 of 2007, S.I. No. 649 of 2011 and E-PRTR Regulation (EC) No 166/2006 (available at <http://www.epa.ie/pubs/advice/licensee/prtr/sino123of2007.html>, <http://www.epa.ie/pubs/advice/licensee/prtr/sino649of2011.html>, and <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:033:0001:0017:EN:PDF>, respectively).
- The EC Guidance Document for E-PRTR implementation (http://prtr.ec.europa.eu/docs/EN_E-PRTR_fin.pdf).
- For further information on national E-PRTR reporting in 2012, the EPA have compiled Ireland's E-PRTR National Report 2012 (<http://www.epa.ie/pubs/advice/aerprtr/prtr/e-prtrnationalreport2012.html>).
- The Integrated Pollution Prevention and Control Directive (2008/1/EC), available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:024:0008:0029:EN:PDF>.
- The Industrial Emissions Directive 2010/75/EU, available at: <http://www.epa.ie/pubs/legislation/industrialemissionslicensing/industrialemissionsdirective201075eu.html>
- Information on a national wastewater monitoring study to facilitate reporting of Priority substances/PRTR pollutants by local authorities from EPA licensed wastewater treatment plants: Wastewater Characterisation Study 2012 (<http://www.epa.ie/pubs/reports/water/wastewater/wastewatercharacterisationstudy.html>).
- The European PRTR Website (<http://prtr.ec.europa.eu/Home.aspx>) provides information on all EU member states as well as Iceland, Liechtenstein, Serbia, Switzerland and Norway
- A variety of information on the substances which companies manufacture or import is available at <http://apps.echa.europa.eu/registered/registered-sub.aspx>.
- The United Nations Economic Commission for Europe PRTR website provides information on the PRTR protocol and Aarhus Convention (<http://www.unece.org/env/pp/prtr.html>)
- A global portal to PRTR information and activities from countries and organisations around the world is available at <http://www.prtr.net>

- Geographical information compiled by the EPA on environmental data is available at ENVISION (<http://gis.epa.ie/Envision/>) which displays information such as Water Framework Directive protected areas, surface water quality, groundwater quality, air quality status.
- Special Areas of Conservation (SACs) i.e. wildlife conservation areas important on a European and Irish level are at: [http://www.npws.ie/protectedsites/specialareasofconservationsac/Special Protection Areas](http://www.npws.ie/protectedsites/specialareasofconservationsac/Special%20Protection%20Areas) (SPAs) are at: <http://webgis.npws.ie/npwsviewer/>.

The EPA website also has sections on:

- ‘Ireland’s Environment’ (<http://www.epa.ie/irelandsenvironment/>), where the public can access information on the themes of Climate Change, Air, Water, Waste, Nature, Land, Environment & Health, and Socio-Economic; and
- ‘My Local Environment’ (<http://gis.epa.ie/myenvironment#/search>) where the public can use the interactive map to find out more about the environment where they live.

3. REPORTING REQUIREMENTS, IDENTIFICATION OF FACILITIES, COMPETENT AUTHORITIES AND DATA TO BE REPORTED (ARTICLE 5)

List legislative, regulatory and other measures which establish the reporting requirements for PRTR. (mandatory question)

The Competent Authority for PRTR reporting in Ireland is the EPA. Following the coming into force of Ireland’s PRTR Regulations in March 2007, there is an obligation on operators carrying out PRTR activities above relevant applicable capacity thresholds (specified in Schedule I) to make PRTR returns. These returns are in the form and content specified by the EPA and cover annual releases (emissions) and off-site waste transfers for each calendar year to be submitted by 31st March of the following year (28th February in the case of uWWTPs).

In Ireland this applies to EPA-licensed facilities and to operators in other industrial sectors, e.g. quarries, that are outside of the licensing system but carry out a PRTR activity above the applicable capacity thresholds specified in the relevant Schedule.

The Irish PRTR Regulations (European Communities (European Pollutant Release and Transfer Register) Regulations 2007 (S.I. No. 123 of 2007), and Pollutant Release and Transfer Register Regulations 2011 (S.I. No. 649 of 2011)) require operators to submit the information specified in Article 5 of the E-PRTR Regulations.

The EPA conducted a review of licensed facilities in 2011 to determine if any additional facilities had a PRTR class of activity. Furthermore, the oil and gas sector (Activity 3(a)) was reviewed in 2012. There is ongoing communication with facilities and where a facility

operator determines that it is no longer reportable this is reviewed on a case by case basis by the EPA.

3.a Whether the Member State applies for its national PRTR either the capacity threshold as reporting requirements for PRTR activities or the employee threshold. (voluntary question)

The capacity threshold of PRTR activities is applied in Ireland.

3.b Whether the Member State applies the reporting obligations only to the operator of each individual facility or also to the owner. (voluntary question)

The Irish PRTR Regulations (2011, Regulation 7) require the operator to fulfil the reporting obligations.

“Operator” is defined in Regulation 2 to mean “the natural or legal person responsible for operating or controlling the facility or the person to whom decisive economic power over the technical functioning of the facility has been delegated.”

In the event that an operator is no longer available, the owner is contacted and requested to fulfil reporting obligations unless they can prove that it is no longer a requirement. For some facilities, the operator is the owner.

3.c Any difference and extension in the list of activities or their associated thresholds (as presented in Annex I) for which reporting is required under the national PRTR system. (voluntary question)

The activities covered by the Irish PRTR Regulations are the same activities included in Annex I of the E-PRTR Regulations.

3.d Describe whether the Member State has adopted lower thresholds for any activity and the reasons for it. (voluntary question)

Lower activity thresholds have not been adopted.

3.e Any difference and extension in the list of pollutants and associated thresholds (as presented Annex II) for which reporting is required under the national PRTR system. (voluntary question)

The 91 pollutants and the relevant thresholds for release to air, water and land are detailed in Schedule 2 to the Pollutant Release and Transfer Register Regulations 2011 which are as set in the E-PRTR Regulation.

3.f Describe whether the Member State has adopted an extended list of pollutants compared to Annex II and the reason for this. (voluntary question)

Ireland has not adopted a mandatory extended list of pollutants for PRTR reporting. EPA-licensed facilities are requested to include emissions from their licensed parameters in their PRTR return.

3.g Any pollutants threshold included in the national PRTR other than the ones listed in Annex II. (voluntary question)

No.

3.h Describe whether the Member State has adopted lower thresholds for any pollutants of Annex II and the reason for this. (voluntary question)

Lower thresholds for pollutants for the purpose of PRTR reporting have not been adopted.

3.i In particular describe the competent authorities designed to collect information on releases of pollutant from point sources. (mandatory question)

The EPA is the Competent Authority for collecting information on releases of pollutants from point sources. This information is collected electronically each year from the PRTR Reporters (many of which also have EPA licences).

3.ii Please describe the pathway of PRTR data collection in your country, listing the type of institutions involved and which part of the validation operations they are responsible for using the table below (mandatory question) :

Facility: EPA licensed facilities and some un-licensed facilities that carry out activities listed in Schedule I of the 2011 regulations, report their pollutant releases and waste transfers to the EPA annually (by 31st March) for the previous year (28th February for uWWTPs). The facilities must ensure that the data is of an appropriate quality and that it is complete, consistent and credible. Operators must keep records of the data from which the reported information was derived including their PRTR Emissions Reporting Workbook and any copies of Calculation Tools that were used. The operator may have to make corrections or validate the data in their PRTR Emissions Reporting Workbook at the request of the EPA.

Local Authority: Some PRTR reporting facilities with EPA licences are operated by local authorities e.g. landfills, waste transfer stations. Hence, these local authorities have the same obligations as the facilities above.

National authority: The Competent Authority for PRTR reporting is the Environmental Protection Agency (EPA) who is responsible for assessing the quality of the reported data and for the validation of the reported data. The EPA provides facility-specific PRTR Emissions Reporting Workbooks via the EPA website. In addition, general and sector specific guidance and calculation tools are available for facility operators. The EPA also provides a dedicated PRTR helpdesk to assist operators with completing their PRTR reports, to provide feedback on the validation process and to answer general queries.

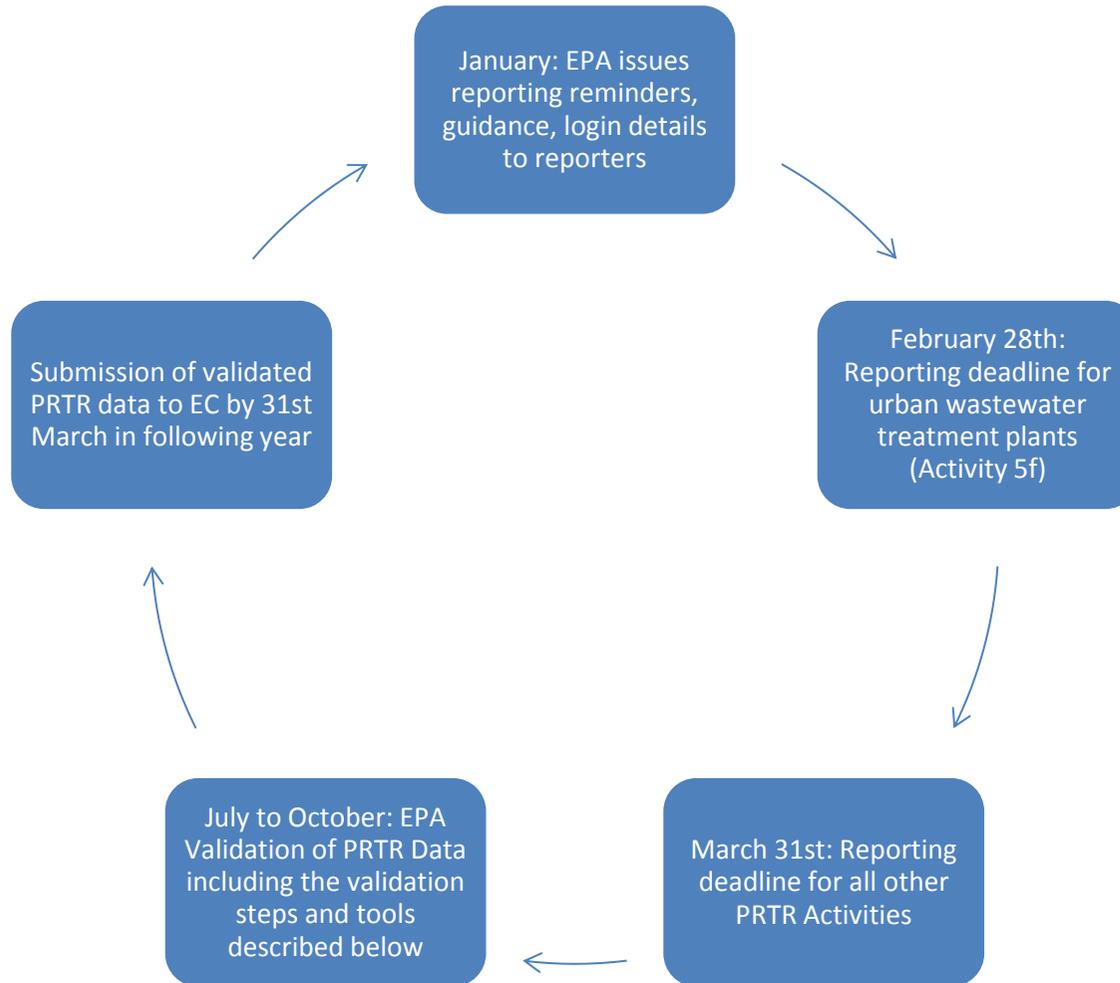
Ministry of the Environment: the Department of Environment, Community and Local Government is mainly involved in policy development. Environmental data such as PRTR data informs evidence-based decision making in Ireland.

Institution	Institution name	Pathway	Validation by this institution	Remarks
Facility	Individual facility	PRTR emissions and waste transfer data are submitted through an electronic workbook.	Reporters are responsible for the quality of the information that they report.	n/a
Local Authorities	Individual local authorities that operate EPA-licensed facilities/carry out PRTR Activities.	PRTR emissions and waste transfer data are submitted through an electronic workbook.	Reporters are responsible for the quality of the information that they report.	n/a
National authority	Environmental Protection Agency	Collection, validation and maintenance of the data in an inhouse application. Transfer of data by XML to the EC and data uploaded to national website.	The EPA is responsible for validation of the data for completeness, credibility and consistency, before reporting to the EC.	n/a
Ministry of the Environment	Department of Environment, Community and Local Government	n/a	n/a	n/a

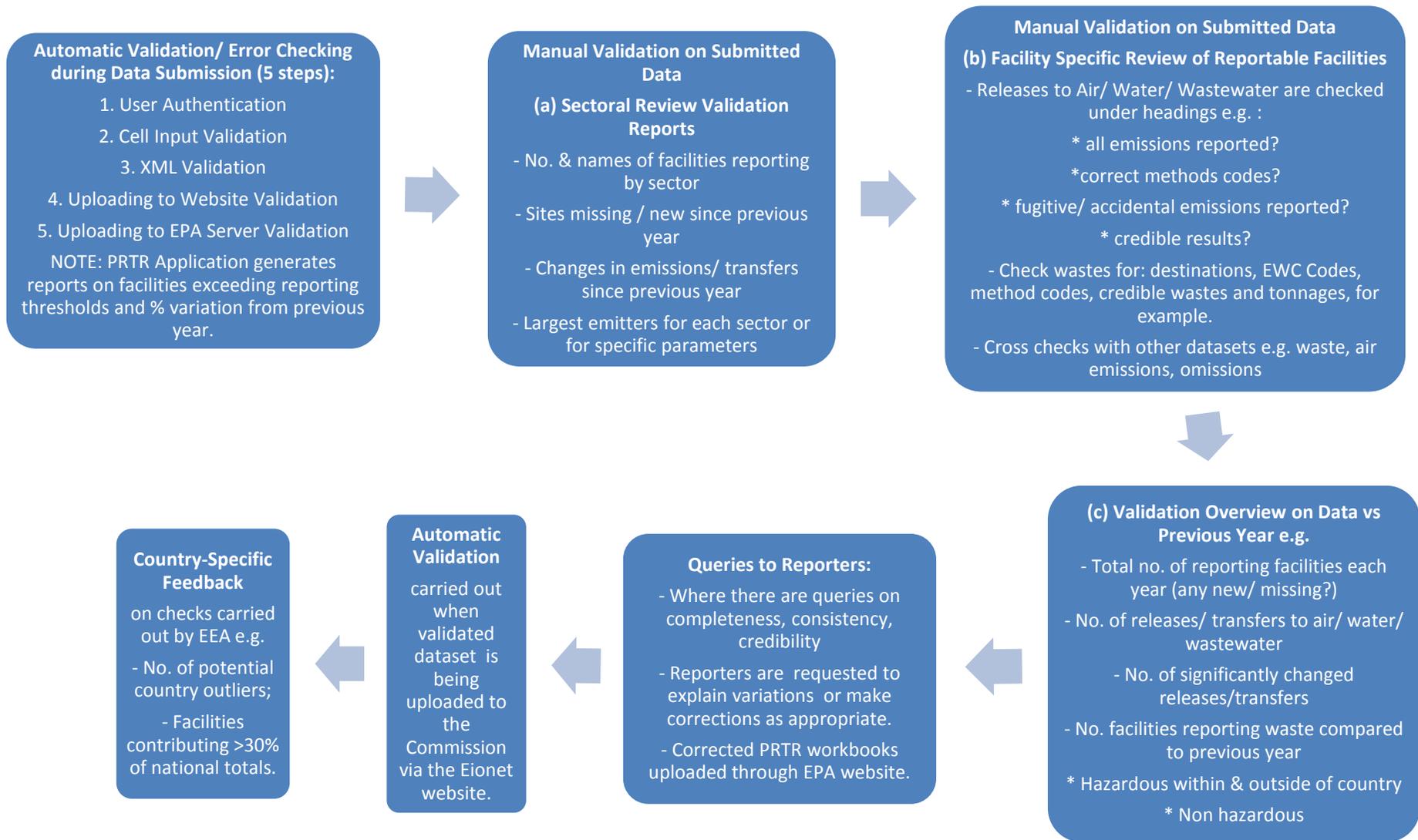
3.iii Please also provide a chart that visually represents the PRTR data flow structure including the validation steps and, when available, the validation tools used in your country. (voluntary question)

Please see the chart (pdf file) uploaded at: http://cdr.eionet.europa.eu/ie/eu/eprtrpam/envu_dxwa/

PRTR Data Flow



PRTR Validation Steps and Tools



4. PRTR REPORTING PRACTICE (ARTICLE 5)

For each reporting cycle since the last reporting questionnaire, please indicate:

2010-2012

4.a Deadlines for reporting to the competent authority. (mandatory question)

Institution	Institution name	Deadline	Reference year
National authority	Environmental Protection Agency (EPA)	31/03	2010
National authority	EPA	31/03	2011
National authority	EPA	31/03	2012

The first reporting year for the European-PRTR was 2007.

The operator is required to furnish the required information to the EPA not later than 31st March in each year (Regulation 7(1) of Ireland's PRTR Regulations 2011). The licensed wastewater discharge agglomerations are required to report the required information to the EPA by 28th February in each year.

Note, for each year as follows:

2010: Reporting deadline was 31/03/2011 (28/02/2011 for uWWTPs)

2011: Reporting deadline was 31/03/2012 (28/02/2012 for uWWTPs)

2012: Reporting deadline was 31/03/2013 (28/02/2013 for uWWTPs)

4.ai Reporting years for which data on releases and transfers are available (the calendar year to which the reported information relates) (voluntary question)

PRTR data for Ireland is available for the calendar years 2007 to 2012 inclusive, and this information is available on Ireland's national PRTR website.

4.a.ii Date by which the information shall be publicly accessible (voluntary question)

31/03/2014

The same deadline is established for making future PRTR data publicly accessible

Yes

4.b Please report difficulties in meeting reporting deadlines.(mandatory question)

The data for years 2010 to 2012 was reported on time by the EPA. Note that there was an EU-wide extension to the 2011 reporting deadline to 8th April 2013, due to the Easter holiday, and Ireland agreed an additional extension (to 15th April 2013) with the EC.

4.bi Please report whether the various deadlines for reporting by facilities were met in practice (mandatory question)

No

4.bii And the reason for delays.

All facilities did not meet their reporting deadline to the EPA. The reasons for delays in reporting data by the relevant facilities provided to the EPA (informally) include burden of reporting commitments for reporters and lack of resources.

4.biii Please report whether the various deadlines for having the information publicly accessible on the register were met in practice (mandatory question)

No

4.biiii the reasons for delays. (mandatory question)

Article 7 (3)(b) of the E-PRTR Regulations requires that information reported by Member States shall be incorporated into the European PRTR within 16 months after the end of the reporting year (e.g. by 30th April 2014 for 2012 data). Ireland's information has been submitted to the EC in time to meet this 16-month deadline.

Please note that Regulation 9 of Ireland's 2011 PRTR Regulations specifies a 15-month deadline for incorporation of the relevant reporting year's information into the publicly available national register (e.g. by 31st March 2014 for 2012 data). To date, the EPA has focused on delivering the E-PRTR data to the EC by the 31st March each year, and then making the reported data available on the national website to coincide with the publication of the data on the European PRTR website (after the 31st March reporting date to the EC). Since Ireland's national PRTR website was made available in October 2011, the information has generally been made available on this website within 16-18 months after the end of the year being reported on depending on ongoing work commitments related to PRTR reporting requirements. However this information is also available on the European PRTR website within the relevant E-PRTR timeframe.

Ireland's PRTR website contains data for the years 2007 to 2012, inclusive.

4.c Proportion of electronic reporting compared to data delivered by operators on paper (mandatory question)

100% of PRTR returns are made to the EPA electronically.

4.ci description of reporting tools available for both operators and competent authorities. (mandatory question)

Tools for operators:

- The EPA's website has a dedicated section for operators, which provides sector-specific and general guidance for reporting and a page for downloading their reporting workbook and uploading the data to the EPA. The EPA has also published a series of guidance documents in relation to compiling the relevant information on emissions and off-site transfers of waste materials from a facility prior to reporting to the EPA (<http://www.epa.ie/enforcement/prtr/operator/>). Regulation 15(2) of the 2011 Regulations provides that the operator must have regard to any guidelines published by the EPA.
- The downloadable excel PRTR workbook is facility-specific and can only be downloaded

using facility-specific login details. This workbook is completed by the operator and an XML file is submitted to the EPA containing their PRTR reporting data for emissions to Air, Water, Waste Water and Waste Transfers.

- The PRTR workbooks have been developed over time to assist the operators and improve the data collected e.g. filling in contact details correctly, validation rules and warning messages if an emission is +/- 50% of the previous year's emission.
- The EPA has developed Emissions Calculation Tools for the Quarries, Intensive Agriculture and uWWTP sectors to assist in the compilation and reporting of better quality data.

Tools for competent authority:

- The EPA has an internal PRTR application developed specifically for PRTR data, which is used to manage, analyse and report the PRTR data for all reporting years since 2007.
- Reports are extracted from the system and used to validate facilities by sector (activity) in order to check for errors in data reported by the operators.

4.d Main difficulties for operators and for competent authorities regarding reporting of PRTR data (please answer from the point of view of the authorities). (mandatory question)

- Time and Resources: a number of facilities have reported reduced resources available to complete reporting requirements.
- IT Skills: some operators may not have the relevant IT skills and therefore require assistance in completing their returns electronically.
- During the validation of the submitted data, common queries to operators relate to: incorrect units (e.g. wastes reported in kilogrammes); incorrect method codes and designations; incomplete reporting (e.g. pollutants reported in previous year not included); comparability of results (e.g. varying emissions from previous year); inconsistent reporting (e.g. PRTR data not matching other data sets submitted to the competent authority); incorrect waste recovery /disposal codes; incorrect waste treatment destination and location of treatment; and leachate reported as a wastewater emission rather than a waste transfer.

5. DATA QUALITY ASSURANCE AND ASSESSMENT (ARTICLE 9(1), (2) AND (3))

Describe the rules, procedures and measures ensuring the quality of the data reported under E-PRTR and what these revealed about the quality of the reported data. (mandatory question)
Regulation 10(1) of Ireland's PRTR Regulations 2011 places an obligation on operators to ensure that robust quality assurance procedures are employed to all data collection and that operators should have regard to PRTR guidance documents published by the EPA. In addition, section 13(5)(c) of the Environmental Protection Agency Act 1992 requires that information given by licensed facilities shall not be false or misleading.

The EPA has engaged with operators regarding their obligations under the PRTR Regulations through written correspondence, training seminars and the publication of PRTR guidance

documents. The guidance documents are available at <http://www.epa.ie/enforcement/prtr/operator/>. PRTR documents published by the EPA include guidance for operators in relation to compiling the relevant information on emissions and off-site transfers of waste materials from a facility prior to reporting via a PRTR Electronic Reporting Workbook on the EPA's website at <http://aer.epa.ie/reporting/pgLogon.aspx>

The PRTR data submitted by the operators is also validated by the EPA in two separate stages, as follows:

(a) Automatic validation:

Automatic validation of the content of the PRTR Electronic Reporting Workbook xml file on upload to the EPA database. The PRTR Electronic Reporting System contains a 5-step Automatic Validation process to ensure that information is only uploaded by those users who are permitted to use the system, and that all required information is inputted correctly.

(b) Manual validation of the submitted data:

The EPA is obliged under Regulation 10(2) of Ireland's PRTR Regulations (2011) to assess the quality of the data submitted by operators, in particular for completeness, consistency and credibility. All reportable information submitted to the EPA is subject to a process of manual validation and verification by the EPA.

The EC also carries out automatic validation checks when the national data is uploaded, and provide feedback in the format of a country-specific report on the uploaded data.

Quality of data reported:

Automatic validation rules have developed and improved over time as a result of the identification of common errors and on-going issues. This has resulted in, for example, the elimination of incomplete reporting in error i.e. the upload of blank datasets or datasets with missing or invalid information.

The manual validation process has improved the quality of data reported by operators by highlighting changes from previous years. Comparison with other national datasets (e.g. air emission inventories and national waste statistics) compiled by the EPA allows validators to cross-check data from different reporting sources. Also a reduction in common reporting errors such as incorrect units, incorrect EWC codes and incorrect final destinations of waste transfers has been noted as a result of manual validation work, which has led to an improvement in quality and consistency of data.

5.a Assessment of the competent authorities on completeness, consistency and credibility of data provided by the operators. (mandatory question)

As outlined in the answer to Question 5 above, the completeness of the data reported is initially checked as part of the automatic validation process which is carried out when the operator uploads their XML file to the EPA database. This process includes 5 steps to ensure

that information is only uploaded by users who are permitted to use the system, and that all required information is inputted correctly. The 5 Automatic Validation steps are:

1. User authentication: the licensee logs into the EPA PRTR Reporting website to download their PRTR Reporting Workbook or to upload their XML file containing their data for submission.

2. Cell input validation/ workbook rules: these help to ensure good quality, consistent data is received from reporters e.g.

- o Prompts: A pop-up box appears if a facility reports an emission for the current year with a value that is +/-50% of the previous year's emission.

- o Method Codes: There is no free-text allowed in the method code field. The facility is provided with a list of approved standards and method codes (including a definition of when to use each code).

- o EWC Codes: EWC codes must be selected from a list and are automatically entered into the workbook (no free text). The description associated with the EWC code is also filled in automatically but can be changed if necessary.

- o Hazardous/ Non-Hazardous: When the operator chooses the EWC code the waste is automatically assigned a hazardous or non-hazardous classification.

- o Recovery/ Disposal Codes: The operator must select these from a list, no free text is allowed.

- o Previous Year's Reporting Data: There are links within the workbook to the facility's reporting data from the previous year, which is useful for comparative purposes.

3. XML validation: this includes a reference year check to verify that the year of the XML data in the file matches the year selected on the reporting website and codes validation e.g. to check if an EWC code is missing or invalid. The overall structure or schema of the XML file is also checked to ensure that it conforms to the expected structure e.g. if the return is incomplete (e.g. missing ultimate recoverer/ disposer of hazardous waste) an error message appears when attempting to create the XML file which identifies where the error is. The PRTR helpdesk in the EPA is available to all operators for any questions that they may have.

4. Uploading to website validation: same process as the user authentication referred to above.

5. Uploading to EPA server validation: similar validation steps here to the XML validation and any errors encountered are emailed back to the operator.

The submitted data from reportable facilities is then subjected to a manual validation process and verification by the EPA. The EPA is obliged under Regulation 10(2) of Ireland's PRTR Regulations to assess the quality of the data submitted by operators, in particular the completeness, consistency and credibility.

The data is checked for consistency with previous reporting years, for the parameters reported, the reported releases and the waste transfers. The variation between years is

checked to see if such variations are credible. Omissions, for example of pollutants or waste streams, are checked for. The operators are then emailed to provide explanations or correct their return, as appropriate. In subsequent years, any errors or omissions detected are followed up with the operator and may necessitate correcting and resubmitting the information in question to the European Commission.

The EC also carries out automatic validation checks when the national data is uploaded and provides feedback in the format of a country-specific report on the uploaded data.

5.b Methodologies and procedures adopted by competent authorities, which resulted in submission of higher quality data. (mandatory question)

The methodologies and procedures are outlined in the table below.

Measure type	Reference	Competent authority/authorities	Description data quality check
Guidance	For reporters to complete and upload their PRTR (and improve data submitted).	EPA	Guidance provided on EPA website for PRTR reporters.
Other	IT (Information Technology): Checks carried out on data being uploaded to EPA.	EPA	User authentication, Cell input validation (workbook rules), XML validation, Uploading to website validation, Uploading to EPA server validation.
Guidance	PRTR Helpdesk	EPA	Helpdesk facility to provide guidance on completing and uploading PRTR return.
Procedure	Checks on submitted data – consistency, completeness, credibility.	EPA	Manual validation of submitted data, including cross checks with other datasets in EPA.
Methodology	Data submitted to EC.	EC	Validation checks on data upload.
Methodology	Data submitted to EC.	EEA	Country-specific Report.

5.c Where relevant, describe also any additional similar measures as regards to the national PRTR system. (voluntary question)

Data to be reported to the European Commission is validated as above.

6. PUBLIC ACCESS TO PRTR DATA (ARTICLE 10(2))

Describe the way(s) in which public access to the information contained in the register is facilitated. (mandatory question)

The Irish PRTR can be accessed electronically, free of charge, at <http://www.epa.ie/enforcement/prtr/>. The website can be accessed from several locations on the EPA website's home page including data reporting and data sets (<http://www.epa.ie/data/>), Enforcement (<http://www.epa.ie/enforcement/>) and Map my Area (<http://gis.epa.ie/SeeMaps>).

6.a How public access to information contained in the national PRTR register has been ensured without an interest having been stated and free of charge? (voluntary question)

Since the launch of Ireland's national register website in 2011, PRTR data from 2007 has been made available free of charge.

6.b Where the information contained in the European PRTR register is not easily accessible to the public by direct electronic means, which measure has been taken to facilitate access to the register in publicly accessible locations. (mandatory question)

Regional EPA offices in Ireland (Wexford, Dublin, Cork, Kilkenny, Monaghan and Castlebar) have a public reading room, and those in Wexford, Dublin, Cork, Monaghan and Castlebar have a computer with internet access available. Members of the public can access the EPA website and other data that has been made publically-available at these locations. Internet access is also available in public libraries.

There is also a Queries Unit within the EPA, to which members of the public can direct their queries and raise concerns about environmental issues.

7. CONFIDENTIALITY (ARTICLE 7(2), 11)

Where any information is kept confidential, give an indication of the types of information, the reason for and the frequency with which it has been withheld. (mandatory question) In particular briefly outline:

Reporting of PRTR information is obligatory under Regulation 7 of Ireland's PRTR Regulations 2011. Regulation 12 provides that an operator may request that specific information concerning releases or off-site transfers be kept confidential; that is, that such specific information should be excluded from the Irish PRTR. In order to benefit from the confidentiality provision, the operator must make a case to the EPA explaining the reasons for the requested confidentiality.

Where an operator considers that information they report to the EPA is confidential they have to complete a Confidentiality Questionnaire which is available on the website at: <http://www.epa.ie/pubs/advice/aerprtr/prtr/confidentialinformationquestionnaire.html>. The

information in the questionnaire is assessed by the EPA and a decision on the confidential nature of the information is returned to the operators.

Having considered the request, the EPA may decide to keep the data confidential. In such a case the Irish PRTR will have to indicate what type of information has been withheld and for what reason it has been withheld, when reporting the dataset to the Commission.

To date, two reporting facilities have been granted confidentiality for waste destination addresses due to their commercially sensitive nature. The EPA has not had any requests for confidentiality from PRTR reporters directly in relation to emissions to the environment reported under PRTR.

7.a Which type of data have been kept confidential. (mandatory question)

Waste destination addresses have been kept confidential for two reporting facilities.

7.b The main reasons given for confidentiality claim. (mandatory question)

The information was deemed to be commercially-sensitive.

7.c The number of facilities per Annex-I-Activity with confidential data and the total number of reporting facility per Annex I-Activity. (mandatory question)

In the 2010 to 2012 reporting period, two facilities, both from the Activity No. 5 (one 5a, one 5c) have requested confidentiality out of the (approximately) 360 to 380 facilities that were reported to the Commission in these years [2010 (361), 2011 (379), 2012 (380)].

7.ci Please provide comments on practical experience and challenges encountered with respect to dealing with confidentiality claims in accordance with Article 4 of the Directive 2003/4/EC on public access to environmental information, in particular with respect to information on releases and transfers as defined by Annex III. (mandatory question)

To date, confidentiality has not been requested on releases or emissions data. The waste destination facilities and their addresses have been kept confidential for two facilities (approximately 0.5% of Ireland's E-PRTR reporters). Of these, only a portion of the waste destinations are relevant to transboundary transfers of hazardous waste (details of which are required by the regulations). The operators of the facilities are requested to maintain the details of the waste addresses on site for inspection by EPA personnel if required.

8. PUBLIC PARTICIPATION IN THE DEVELOPMENT OF PRTR (ARTICLE 12) (voluntary question)

Describe the opportunities for public participation in the development of the European PRTR system and any relevant experience with public participation in the development of the system. (voluntary question)

Regulation 13 of the PRTR Regulations 2011 provides for ongoing opportunities for public participation in the further development of the register.

The Irish PRTR website includes a feedback facility whereby any person can submit comments or queries regarding any aspect of the register/ website (available at <http://prtr.epa.ie/Contact.aspx> and at <http://gis.epa.ie/ContactUs>).

The PRTR reporting obligations on operators have been incorporated into the IPC/ IE/ Waste/ WWDA licensing system administered by the EPA. The Irish IPC/ IE/ Waste/ WWDA licensing system is open and transparent and the public is given the opportunity to participate through written submissions and objections.

8.a Where relevant describe also any additional similar opportunities for public participation in the context of the development of the national PRTR system. (voluntary question)

Following Ireland's ratification of the UNECE PRTR Protocol in June 2012, the Department of Environment, Community and Local Government (DECLG) undertook a public consultation in 2013 on the implementation of the PRTR Protocol in Ireland. Information on this consultation is available at:

<http://www.environ.ie/en/Environment/UNECEProtocolonPRTRsPublicConsultation/>

9. ACCESS TO JUSTICE (ARTICLE 13) (voluntary question)

Describe the procedure to ensure access to justice in matters relating to public access to environmental information in accordance with the provisions of Article 13 of the E-PRTR Regulation. (voluntary question)

On 28th January 2003, Directive 2003/4/EC of the European Parliament and of the Council on public access to environmental information and repealing Council Directive 90/313/EEC was adopted (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32003L0004:EN:NOT>).

The European Union has fulfilled the obligations of Article 14 of the PRTR Protocol through this legislation. Ireland has accordingly transposed the provisions of Article 14 of the Protocol in accordance with the requirements of Directive 2003/4/EC through the European Communities (Access to Information on the Environment) Regulations 2007 to 2011 (S.I. No. 133 of 2007 and S.I. No. 662 of 2011 – available at <http://www.epa.ie/pubs/legislation/accessinfo/>).

The Irish PRTR constitutes 'environmental information' as defined in the European Communities (Access to Information on the Environment) Regulations 2007 to 2011. As such, the provisions of these Regulations apply to issues relating to access to the Irish PRTR.

In particular the following articles of the Access to Information on the Environment Regulations 2007 to 2011 establish the statutory obligations on public authorities (including

the EPA) with respect to access to justice relating to a request for environmental information relating to the Irish PRTR:

- (i) Article 11
- (ii) Article 12
- (iii) Article 13.

9.a In particular, illustrate the procedure, and the use made of it, that any person who considers that his or her request for information contained in the register have been allegedly ignored, wrongfully refused, or otherwise not dealt with has access to a review procedure before a court of law or another independent and impartial body established by law. (voluntary question)

Review Procedures:

Ireland has provided a two tier system of review under the European Communities (Access to Information on the Environment) Regulations (S.I. No. 133 of 2007 and S.I. No. 662 of 2011).

Article 11 of Ireland's Access to Information on the Environment Regulations (2007 to 2011) establishes the right to an internal review, free of charge, and the procedures under which this right may be exercised.

Article 12 sets out the appeals mechanism, which is an appeal to the Commission for Environmental Information (CEI), an independent office. In accordance with Article 12(7), public authorities must comply with decisions of the CEI within 3 weeks of receipt of the decision. The CEI may apply to the High Court for an order directing a public authority to comply with a decision should it fail to do so.

Article 13 provides that a party to an appeal to the CEI or any other person affected by a decision of the CEI may appeal the decision to the High Court on a point of law.

Judicial Review:

Regulation 14 of Ireland's PRTR Regulations 2011 provides that a person can appeal a decision of the EPA relating to a request for information under Regulation 11(2) by means of Judicial Review.

Any use made of Review Procedures:

To date, any request for information relating to the Irish PRTR data reported to the European Commission has been acceded to by the EPA. Accordingly, no review of a decision by the EPA has arisen specifically in relation to PRTR information.

10. PUBLIC AWARENESS AND CAPACITY BUILDING (ARTICLE 15) (voluntary question)

Describe how public awareness of European PRTR has been promoted. Detail, if appropriated, additional information on:

- When the national website was launched in October 2011 there was a press release to inform the public that the system was available on-line and what information it contained: 'EPA launches map-based website to enhance public access to information on pollutants' (released October 2011, available at: <http://www.epa.ie/newsandevents/news/previous/2011/name,47803,en.html>).
- When the 2007 to 2010 data was made available on the website there was a press release: 'Latest data on Ireland's E-Pollutant Release & Transfer Register now available' (released November 2012, available at: <http://www.epa.ie/newsandevents/news/previous/2012/name,47675,en.html>).
- The publication of the 2011 data to the website was also accompanied by a press release: 'EPA reports on 2011 European Pollutant Release and Transfer Register for large industrial facilities' (released June 2013, available at: <http://www.epa.ie/newsandevents/news/previous/2013/name,51924,en.html>).
- For the 2012 data, the EPA prepared a report on the E-PRTR data, which has been published to the EPA's website at: <http://www.epa.ie/pubs/advice/aerprtr/prtr/e-prtrnationalreport2012.html>
- A link to <http://prtr.epa.ie/> is also available on the following websites <http://www.askaboutireland.ie/enfo/irelands-environment/aarhus-convention/prtr-protocol/>, and the Citizen's Information website at http://www.citizensinformation.ie/en/environment/environmental_law/aarhus_convention.html which are accessible (free of charge) through internet access (and also through free internet access available in public libraries).
- Following Ireland's ratification of the United Nations Economic Commission for Europe (UNECE) Protocol on Pollutant Release and Transfer Registers (known as the PRTR Protocol) in June 2012, the Department of Environment, Community and Local Government (DECLG) undertook a public consultation in 2013 on the implementation of the PRTR Protocol in Ireland. Information on this consultation is available at: <http://www.viron.ie/en/Environment/UNECEProtocolonPRTRsPublicConsultation/>

10.a Efforts to provide adequate capacity-building for and guidance to public authorities and bodies. (voluntary question)

[Not answered]

10.b Assistance and guidance to the public in accessing PRTR registers and in understanding the use of the information contained in it. (voluntary question)

The Irish PRTR at <http://www.epa.ie/enforcement/prtr/> is a user-friendly website that seeks to facilitate ease of use by the public. A feedback facility is included on the website should a user encounter any difficulties or have any queries. The EPA responds to any feedback in a timely fashion. Access to computer facilities is available in public libraries.

In addition, the EPA has established an Environmental Queries Unit which the public can contact with any query of an environmental nature via email, a lo-call number or in person (see www.epa.ie/).

11. COOPERATION AND ASSISTANCE (voluntary question)

Describe how the Member State has cooperated and assisted other PRTR and encouraged cooperation among relevant international organizations, as appropriate, in particular:

The EPA attends E-PRTR working group/ Article 19 Committee meetings in Brussels. Information on the Irish PRTR and systems is shared with countries developing technology for their national register as required.

11.a In international actions. (voluntary question)

n/a

11.b On the basis of mutual agreements. (voluntary question)

n/a

11.c In sharing information on releases and transfers within border areas. (voluntary question)

n/a

11.d In sharing information among other PRTR systems. (voluntary question)

n/a

11.e In technical assistance. (voluntary question)

n/a

12. FURTHER COMMENTS (voluntary question)

Provide any further comments relevant to the PRTR implementation, or, preparation for further implementation. (voluntary question)

During the 2010 to 2012 reporting period, a number of key developments in Ireland's PRTR implementation were achieved. These are highlighted here:

- The National PRTR website (<http://www.epa.ie/enforcement/prtr/>) was launched on 12th October 2011.
- Rules in the PRTR electronic reporting workbook were implemented to reduce the level of validation required and assist operators.
- In 2012, an Effluent Characterisation Study on uWWTPs was completed. Part of this delivery was a revised calculation tool for uWWTPs for use in calculating their emissions. This provides uWWTP operators with a means of estimating releases to water of PRTR substances for which monitoring data may not be readily available. This tool was used for reporting of 2011 and 2012 E-PRTR data to the European Commission.

For further implementation of the E-PRTR Regulations, it is noted that IED Activity Classes do not match E-PRTR Activities in all cases and this may cause issues for consistency of reporting, validation, and comparisons of trends, for example. Updated guidance and a review of the E-PRTR Regulations (EC Regulation No. 166/2006) in relation to IED implementation would be welcomed.

12.a Please identify any challenges encountered in setting up, gathering data for and filling in the register and any remaining obstacles. (voluntary question)

A challenge in gathering the PRTR data has been the absence of a cut-off point for the re-upload of PRTR data by operators. In practice, a time limit for re-uploading information may be appropriate to reduce the on-going validation effort required for newly submitted information.