

## **EURACOAL Response to Inception Impact Assessment**

### **European Pollutant Release and Transfer Register (updated rules) (Ares(2020)5067014 – 28 September 2020)**

EURACOAL cautiously welcomes the European Green Deal's proposed zero-pollution ambition for air, water and soil, noting however that to reach zero may entail costs tending towards infinity.

The European Pollutant Release and Transfer Register (E-PRTR) holds emission data for 91 pollutants at around 30 000 industrial facilities, including annual mass releases (and transfers) to air, water and land. Emissions regulated under the Industrial Emissions Directive (IED) are covered, as well as greenhouse gases and heavy metals, for example. The E-PRTR was established by Regulation (EC) 166/2006.

Following an evaluation of the E-PRTR regulation in 2017 and an implementation review in early 2020, the Commission identified areas where the regulation might be extended to cover more sectors, *e.g.* agro-industrial, additional pollutants and smaller releases, as identified in a recently completed evaluation of the IED. In addition, the Commission would like to collect data that contribute to the circular economy and decarbonisation agendas, such as consumption of energy, water, raw materials.

The Inception Impact Assessment (Ares(2020)5067014 dated 28 September 2020) cites many benefits of a revised E-PRTR Regulation, such as easier public access to environmental information. It dwells less on the costs and burdens which EURACOAL hopes will be quantified in the impact assessment that will be carried out as part of the decision-making process. In particular, we are interested to better understand the real costs to industry of data collection, and issues related to commercial confidentiality and competitiveness as the Commission drills ever further down to reveal sensitive data on production processes. Companies in non-EU countries may unwittingly benefit from knowing the strengths and weaknesses of the EU's industrial producers.

EURACOAL looks forward to continued co-operation with the Commission as it develops its thinking on the important topics of pollution monitoring, reporting and control.

26 October 2020