



Fédération Européenne des Activités du Déchet et de l'Environnement  
 European Federation of Waste Management and Environmental Services  
 Europäische Föderation der Entsorgungswirtschaft

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## FEAD COMMENTS

on the “Guidance Document (Draft, 20/12/2005, BiPRO)

for the implementation of the European PRTR”

FEAD is the European Federation which represents the European waste management industry. Our members are national waste management associations, which have an approximate 60% share in the household waste market and handle more than 90% of industrial and commercial waste in Europe, with a collective annual turnover of € 50 billion.

We have 18 members from 17 EU Member States and Norway. FEAD represents companies with activities in all forms of waste management. These companies employ over 300000 people who operate around 3 000 controlled landfills, 1 350 recycling and sorting centers, 1 000 composting sites and 350 incinerators and play an important role in the determination of the best environmental option for waste management problems.

Page of G.D.	Guidance text/figure	FEAD comment/question
10	« the background load of a certain pollutant in water may be taken into account »	The background values should be considered independently from the nature of water (river, groundwater or recycled industrial water). As an example, if a site uses water from water treatment plant, it should declare only the difference of flow per pollutant between the entrance and the exit from the site. This is in line with the integrated approach of the IPPC aiming at limiting resource consumption.
10	« if concentrations in release are below determination (quantification) limits this does not permit in any case a conclusion that threshold values are not exceeded »	This causes a problem, because it is not always possible to quantify certain pollutants. However, the threshold can be exceeded, resulting in the obligation to declare, whereas the absence of these pollutants is undoubtedly proven (following literature studies, measurements campaigns, etc.)  The Guidance document should provide clear answers on the following practical questions related to the procedure: 1. How does an operator convince the competent authority that a pollutant is below the threshold?  2. How does an operator convince the competent authority that the threshold will never be exceeded?  3. How often does an operator have to do that (cf. questions 1 and 2)?
11	« following the principle of subsidiarity Member States may ...	We are concerned that E-PRTR will cause an extra administrative burden and would like to emphasize that

APOH, Slovakia  
 ASELIP, Spain  
 BDE, Germany  
 ESA, UK

FEGE / FEBEM, Belgium  
 FISE, Italy  
 FLEA, Luxembourg  
 FNADE, France

IWMA, Ireland  
 JLY, Finland  
 KSZGYSZ, Hungary  
 NRF, Norway

PASEPPE, Greece  
 PIGO, Poland  
 RVF, Sweden  
 VA, Netherlands  
 VÖEB, Austria



	integrate reporting (to E-PRTR) with other reporting mechanisms”	uncertainties with respect to reporting (co-ordination with other national or international reporting obligations) need to be better clarified in the Guidance document.
20 and 23	§ 1.1.8.2 and § 1.1.9	We understand that: <ul style="list-style-type: none"> <li>✓ the discharges in water concern the discharges to the natural environments and</li> <li>✓ waste-water “off-site transfer” concern the discharges to waste water treatment plants;</li> </ul> The rate of pollutants’ abatement in waste water treatment plant is not mentioned. However, in France that is taken into account in declaration formularies to determine the final discharge.
24	§ 1.1.10 “The operator has to indicate whether the waste is destined for recovery or for disposal”	The Guidance document should give clarification on how to proceed when waste is destined for an operation which cannot be classified as “recover” or “disposal” (e.g.: sorting)
28-29	§ 1.1.11 Measurement/calculation/estimation	We appreciate the reference to the IPCC guidelines. Many of the current methods are not internationally approved, while IPCC has gone through a harmonization process.
32	§ 1.1.11.4 “E-PRTR activity sector 5: Waste management: landfills”	<ul style="list-style-type: none"> <li>✓ Since it is not economically feasible that all listed pollutants are measured at each landfill site, the reporting must be built on: 1) measured concentrations in leachate and landfill gas for the relatively few substances, 2) calculations and estimations (e.g., on the basis of literature data).</li> <li>✓ In accordance with FEAD position paper on E-PRTR (from 2 May 2005), we emphasize again that results from methane emission calculating models and field measurements are uncertain. The limited reliability of the data must be explained along with the results when it is presented for E-PRTR.</li> <li>✓ There are not many Member States that already have a procedure for formal closure of landfills. If abandoned landfills are not formally discharged from the reporting obligation, this indicates either an enforcement problem or a problem of discrepancies between Member States in reporting to E-PRTR. This issue should be addressed in the guidance document.</li> </ul>
38	§ 1.2.3 “Quality assessment”	Measures/procedures that are to be arranged for quality assessment of the data provided by the operators to Member States should be further clarified.
70-74	Appendix 3, « list of measuring methods for air and water pollutants »	<ul style="list-style-type: none"> <li>✓ For this table it is necessary to clarify (in abbreviations) what are the methods of measurement “WI” in water.</li> <li>✓ Standards and/or methods regarding sampling from water are not provided. This is important for an accurate quantification of flows.</li> <li>✓ The list is incomplete. Some corrections and addition of other relevant methods are suggested: see the separate file “<b>FEAD comments to Appendix 3.doc</b>” with modifications to the Appendix 3 in track changes.</li> </ul>
81	Appendix 4, « Indicative sector	Concerning the pollutants in the air, there is an error,



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	specific sub-list of air pollutants »	because the pollutant #91 "Benzo(g, h, i)perylene" does not form part of the pollutants emitted in the air to declare.
92	Appendix 6, Figure 3, stream C: example of "off-site transfer"	The meaning of "off-site transfer" is confusing. If a site consists from several installations, the main and the secondary installations are considered. In case of flow from the main installation towards the secondary ones, it is considered as "off-site transfer". In table 24 stream C is indicated as an "off-site transfer", while it is a transfer from one facility to another one within the same site.