

E-PRTR and LCP integrated reporting – Post-Submission Review

Manual of Procedure

Version 1.2 – 03/09/2020



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Acknowledgments

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Version control

Version number	Date	Description
0.1	May 2019	Preliminary draft for first review
0.2	October 2019	Completed version for second review
1.0	December 2019	Revised version. Major updates.
1.1	January 2020	Revised version. Minor updates.
1.2	September 2020	Revised version. Updates based on practical execution of the checks.

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Introduction

Under the European Commission initiative to streamline the reporting of emissions for industrial entities, thematic information for large combustion plants (LCPs) required under the Industrial Emissions Directive (IED)¹ and facilities under the European Pollutant Release and Transfer Register (E-PRTR) Regulation (EC) No 166/2006² is now to be reported in an integrated dataflow. This will result in a coherent and consistent database of emissions data from LCP installation parts and E-PRTR facilities.

The purpose of this manual is to detail the logic and proposed implementation of a range of post-submission quality assurance/quality control (QA/QC) checks, which will be performed by expert reviewers on successfully reported thematic data. These checks go beyond the automated QA/QC checks already included in the central data repository (CDR), the reporting platform used for the E-PRTR & LCP data reporting, which are described in the separate report on [Quality assurance logic - E-PRTR & LCP reporting](#).

The checks proposed within this document are split into two groups:

1. **Temporal checks** – These checks look holistically across a number of reporting years to determine whether certain aspects of reporting are being adhered to, e.g. analysing the frequency of changes in certain attributes or patterns in reporting, and to assess coherence over time. Prior mapping of historical E-PRTR and LCP data will allow these checks to be performed from the first E-PRTR-LCP integrated reporting year.
2. **Activity-related checks** – This group analyses the consistency of the reported data with regard to the activity. Data are reviewed in comparison to expected ranges of values or external databases linked to the activity.

Checks within each group are detailed in the sections below.

This document may be amended over time in case additional post-submission checks become necessary. Future reporting rounds may, for example, incorporate additional temporal checks as further data becomes available. Checks currently outlined in this document may also help to complement and refine the automated checks on CDR.

The findings of each check will be communicated to the reporting countries via a feedback file called *findings log*.

1 Temporal checks

C1.1 – Top ProductionFacility releases/transfers at national level

The methodology of this check is currently under revision and therefore findings related to this check were not included in the finding logs sent to countries in 4/2021 related to 2019 data.

Rationale:

The national top polluting facilities are the biggest contributors to the emissions for specific pollutants. Therefore, it is recommended to check the reported values and, if possible, clarify them. The ranking system also indicates if the facility was within those top polluters in the previous year, or not. Always being ranked under the top polluting facilities for a specific pollutant could indicate that the values are correct, and the facility is indeed responsible for those high emissions. Conversely, a significant difference of rank compared to the previous year may indicate an error.

Checking rules:

This check creates a list of top 5 ProductionFacilities for pollutant releases (to air and water), pollutant transfers in waste water and waste transfers for the current reporting year. Only specific pollutants are analyzed (see [Annex I – List of specific pollutants](#) in this document). For waste transfers, quantities are aggregated by WasteClassification (namely hazardous “HW” or non-hazardous wastes “NON-HW”).

For each ProductionFacility the national share (%) is calculated as:

$$\text{NationalShare (\%)} = \frac{\text{E – PRTR release or transfer quantity (per pollutant, medium and year)}}{\text{National release or transfer quantity (per pollutant, medium and year)}} * 100$$

Note: Unit is kilograms (kg) for pollutant releases and pollutant transfers in wastewater, and tonnes (t) for wastes.

The rank and national share for the reporting year (Y) are then compared to the rank and national share of the previous reporting year (Y-1).

Output:

This check will return a table with the top 5 facilities for the considered pollutant releases, pollutant transfers in waste water and waste transfers, including rank and NationalShare for years Y and Y-1. The European rank from [automated check 14.1 \(p48\)](#) will also be included as complementary information to analyse year-to-year variation.

A flag will be raised for facilities showing a difference of year-to year difference of the NationalShare larger than +/-30%.

Dependencies to look-up tables or external data:

Part of this check depends on a table that contains the rank and NationalShare of each ProductionFacility for year Y-1, for specific pollutants by release medium, transfer in waste water and WasteClassifications.

C1.2 – Comparison against production volume

Rationale:

Emissions trends are expected to follow trends in production volume. Instances where production volume trends differ significantly from reported releases or transfers from one year to the next may indicate reporting errors.

Checking rules:

This check is carried out at the facility level. It only applies to facilities that report large emissions. These are facilities whose lowest reported PollutantRelease/PollutantTransfer values across the current and previous reporting years are greater than 20 times the E-PRTR Annex II pollutant threshold for the specified pollutant:

$$\text{Pollutant time series: Lowest reported release} > (20 * \text{Annex II pollutant threshold})$$

For each identified ProductionFacility, this check calculates the variation of production volume, if available, between the previous and current reporting years. It makes a list of ProductionFacilities showing significant changes (> 20%).

For those facilities, changes in pollutant releases/transfers are calculated. The check detects PollutantReleases and PollutantTransfers showing an increase (resp. decrease) whereas production volume has decreased (resp. increased).

Output:

The list of ProductionFacilities and related PollutantReleases/Transfers showing a mismatch between variation in production volume and emission change will be provided in the feedback file. Justification or correction will be requested from the reporting countries.

Dependencies to look-up tables or external data:

This check requires access to a table populated with production volumes and pollutant releases/transfers from the previous reporting year.

C1.3 - Time series consistency at the facility level (water)

Rationale:

By viewing reported emissions from ProductionFacilities in relation to the whole time series data, reporting errors can be identified based on the degree to which the reported values deviate from the previous reports. This check is used to detect potentially inconsistent pollutant release values within the context of multi-annual reporting for a specific facility and its activity. It follows the same principles as automated check C12.5 but is applied to emissions to water.

Checking rules:

This check only applies to facilities that report large emissions and as such the first stage of this check identifies eligible ProductionFacilities. These are facilities whose lowest reported PollutantRelease values, across the time series, are greater than 20 times the E-PRTR Annex II pollutant threshold for the specified pollutant:

$$\text{Pollutant time series: Lowest reported release} > (20 * \text{Annex II pollutant threshold})$$

Once these ProductionFacilities have been identified, this check will flag ProductionFacilities where the pollutant release ratio (defined as the maximum reported release quantity divided by the minimum reported release quantity) exceeds a threshold value for any given year, including the reporting year. This threshold is currently set at ten. Hence, ProductionFacilities will be flagged where the following inequality is true for any given year in the time series:

$$\text{Pollutant release ratio} = \frac{\text{Maximum reported release}}{\text{Minimum reported release}} > 10$$

This check will be performed on all reported pollutants released to water. This check does not apply for ProductionFacilities whose time series are not consistently available back to 2008. If a zero value is detected as the minimum reported release for the most recent reportingYear, the statusType attribute will be referenced in the EU Registry and ‘decommissioned’ and ‘disused’ facilities’ results will be disregarded.

Output:

This check will return the list of ProductionFacilities, PollutantReleases and reportingYears for which the pollutant release ratio threshold has been exceeded. Confirmation or correction will be requested from the reporting countries.

Dependencies to look-up tables or external data:

This check depends on table populated with historical time series data for ProductionFacilities, their EPTRAnnexIAActivities and PollutantReleases to water. This check will also need access to the EU Registry to cross reference the facility statusType.

C1.4 – Comparison of water releases to wastewater transfers

Rationale:

There may be confusion on behalf of operators as to whether they should report direct pollutant releases to water or pollutant transfers in wastewater (indirect releases using urban waste water treatment infrastructure). Fluctuation in reporting of direct and indirect releases from one year to another may indicate reporting errors.

Checking rules:

This check is carried out at the facility level. Only some pollutants (Total Organic Carbon, Total Nitrogen, Total Phosphorus and several heavy metals: Cadmium, Lead, Mercury and Nickel) will be considered (see [Annex I – List of specific pollutants](#) in this document).

This check consists of the following stages:

1. For each facility and specific pollutant, the total pollutant quantity released to water and transferred in waste water is calculated:

$$\text{Total} = \text{totalPollutantQuantityKg released to water} \\ + \text{totalPollutantQuantityKg transferred in wastewater}$$

This total is calculated both for the reporting year Y and the previous reporting year Y-1.

2. The following cases are considered:

- The total for year Y-1 is zero:
No action
- The total for year Y-1 is different from zero and the total for year Y is zero:
The couple (facility, pollutant) is flagged.
- The totals for Y-1 and Y are different from zero, then the following ratio is calculated for each year:

$$Ratio_{water} = \frac{\text{totalPollutantQuantityKg released to water}}{\text{Total}}$$

Ratio_{water}=1 means that only a direct release to water has been reported for the selected pollutant.
Ratio_{water}=0 means that only an indirect release to water (i.e. transfer to wastewater) has been reported for the selected pollutant.

The couple (facility, pollutant) is flagged if this ratio changes from 1 to 0 or from 0 to 1 from year Y-1 to year Y.

Output:

This check will return the ProductionFacilities and pollutants that fall into one of the previously flagged cases. Justification or correction will be requested from the reporting countries.

Dependencies to look-up tables or external data:

This check is dependent on a table containing the *Total* and *Ratio* values from the previous year.

C1.5 – Waste transfer address consistency

Rationale:

For hazardous wastes transferred outside the country (HWOC), operators are required to provide the destination address. Existence of a character string for the corresponding attributes is controlled on the CDR (automated check C3.6). This additional check determines whether this character string is meaningful.

Checking rules:

This check is carried out at the facility level. Where the wasteClassification is set to ‘HW’ within the OffsiteWasteTransfer feature type and the waste transfer is transboundary in regard to the country reporting, the attributes nameOfReceiver, addressOfReceiver, addressOfReceiverSite will be verified manually:

- NameOfReceiver, City and Streetname should correspond to actual names and locations;
- The address accuracy will be controlled with online mapping applications.

It is not feasible to check all reported values. Instead a spot-check of 10 addresses per country will be checked each year.

Output:

A warning will be issued for the ProductionFacilities and related OffsiteWasteTransfers showing seemingly inconsistent addresses. Confirmation or correction will be requested from the reporting countries.

Dependencies to look-up tables or external data:

None.

C1.6 – Confidentiality reason for several years

Rationale of the check:

This control aims at verifying the consistency of confidentiality reasons across the reporting years. Confidentiality can be claimed for ProductionInstallationPartReport, EnergyInput, EmissionsToAir, ProductionFacilityReport, OffSiteWasteTransfer, OffSitePollutantTransfer and PollutantRelease. This check will focus on master entities ProductionInstallationPartReport and ProductionFacilityReport instead of focusing to detailed information like pollutant releases.

Checking rules:

For each confidentiality claimed, this check determines whether the same reason was invoked in the previous reporting years and flags ProductionFacilities for which it is not the case.

Output:

This check will produce a list of ProductionFacilities for which the reason for confidentiality differs from the previous years. Clarification will be requested from the countries.

Dependencies to look-up tables or external data:

This check will require access to a table populated with historical confidentiality reasons claimed for facilities.

2 Activity-related checks

C2.1 – Comparison of E-PRTR totals with totals of EU-ETS (CO₂)

Rationale:

The EU emission trading system (ETS) was implemented by [Directive 2003/87/EC](#). CO₂ air release reported to E-PRTR (which include the CO₂ from biomass) should be coherent with EU-ETS at national level and possibly at facility level. The comparison at activity level is difficult because of many differences between scopes of activities between each obligation. Perhaps, in the future, few specific activities could be compared.

Comparing E-PRTR and ETS at national or facility level may indicate potential reporting errors but also missing data/E-PRTR facilities.

Checking rules:

This check is carried out at national level and, where ETS identifiers are provided in EU-Registry, at the facility level.

It highlights differences of CO₂ air release totals between E-PRTR and EU-ETS at national level, and if possible, at facility level. In that case, it can identify facilities which are potentially missing from E-PRTR.

For each country and each ProductionFacility with known ETS identifier, ratios are calculated. The example below describes the calculation method at facility level, but it is the same at national level.

$$\text{Share}_{\text{facility}} (\%) = \frac{\text{total CO}_2 \text{ air releases reported under E-PRTR for facility } A}{\text{total CO}_2 \text{ emissions reported under EU-ETS for facility } A} \times 100$$

A share significantly below 100% could indicate incomplete reporting of CO2 emissions under E-PRTR. Conversely a share significantly above 100% might indicate potential outliers in E-PRTR data (or incomplete reporting under EU-ETS).

If ETS identifiers are reported under EU-Registry, missing facilities in E-PRTR thematic data compared to ETS can be highlighted.

Output:

The result of the check will consist of three tables, as illustrated by the following examples:

- A table with comparison results by country:

Country	Unit	Total E-PRTR	E-PRTR Facilities	ETS verified emissions	ETS Installations	E-PRTR/EU_ETS
Austria	Gg	29 408.0	46	28055.97	198	105%
Belgium	Gg	43 284.0	65	43 853.14	335	99%

- A table per country with comparison results by facility:

Country	Unit	Facility	E-PRTR	ETS	E-PRTR/EU_ETS
France	Gg	Facility A	158	254	62%
France	Gg	Facility B	678	602	112%

- A table per country with potentially missing facilities:

Country	Unit	Facility	ETS
France	Gg	Facility A	254
France	Gg	Facility B	602

Any of the following issues will be flagged in the findings log. The thresholds to apply to the share for the detection of outliers will be appreciated and adjusted by experts according to the number of cases:

- List of facilities for which the ratio is < XX%;
- List of facilities for which the ratio is > 1XX%;
- XX Potentially missing facilities.

The reporting countries will be asked to provide justification of correct the reported data.

Dependencies to look-up tables or external data:

To perform the comparisons, the data contained in the EEA’s “EU-ETS data viewer” (which provides verified CO2 emissions by Member States) will need to be retrieved for each new reviewing round.

C2.2 –UWWTP release outliers or missing pollutants per year

Purpose:

The collection, treatment and discharge of urban waste water are regulated by the [Urban Waste Water Treatment Directive \(UWWTD\)](#). Urban waste water releases reported under E-PRTR (Total-nitrogen, Total-phosphorus, TOC, 8 metals and their compounds and DEHP) should be consistent with information collected under UWWTD. Comparing the two may highlight outlying data.

Checking rule:

This check is carried out at the facility level. It is limited to UWWTPs (urban waste water treatment plants) > 100 000 p.e. and only Total-nitrogen, Total-phosphorus, Total organic carbon (TOC), 8 metals and their compounds (As, Cd, Cr, Cu, Hg, Pb, Ni, Zn) and Di-(2-ethylhexyl) phthalate (DEHP) are considered.

It is based on theoretical emissions calculated from the loads entering the considered UWWTPs (in p.e.) and a median ratio between emissions and loads entering.

It consists of the following steps:

1. E-PRTR UWWTPs (E-PRTR Activity is 5.(f)) which reported releases for the year of concern are selected,
2. For each pollutant and treatment level (see [Annex II – Treatment Level of UWWTP](#)), ratios of releases divided by loads entering are calculated per facility:

$$Ratio_{(pollutant A, Facility X)} = \frac{E - PRTR Release_{(Pollutant A, Facility X)}}{UWWTPD Load entering_{Facility X}}$$

3. The median of ratios is calculated per pollutant and treatment level,
4. For each UWWT Plant and each pollutant, a theoretical release is calculated by multiplying the load entering the UWWTP by the corresponding median ratio,

$$Theoretical\ value_{(Pollutant A, Facility X)} = Load\ entering_{Facility X} * Ratio_{(Pollutant A, Facility X)}$$

5. A two-sided range is defined around the calculated potential release with a factor 10

For each calculated release, two types of issue can be detected depending on the reported data:

- An E-PRTR release (>0) has been reported for the considered UWWTP and pollutant:
The reported value is considered as an outlier if it falls outside the two-sided range.
- No release has been reported under E-PRTR for the considered UWWTP and pollutant:
The missing pollutant is considered as an issue if the lower bound of the range is above the pollutant threshold value.

Output:

The detected outliers and missing pollutants will be provided for each country in a tabular form, as illustrated hereafter.

Year	MS	National ID	Pollutant code	Calculated release * 0.1	Calculated release	Calculated release *10	E-PRTR reported release	E-PRTR Threshold	Message	E-PRTR / calculated release
2018	FR	734.00301	CU and compounds	6.8	68.4	683.6	717	50	Potential outlier because the reported <u>release is above the maximum</u> of the range	10.5
2018	FR	734.00301	HG and compounds	1.5	16.4	163.3	<i>Pollutant not declared</i>	1	Potential missing pollutant because <u>the minimum of range is above the threshold.</u>	
2018	FR	734.00301	DEHP	1.1	10.9	108.9	1.03	1	Potential outlier because the reported <u>release is below the minimum</u> of the range	0.09
2018	FR	741.00278	DEHP	0.7	7.9	79.2	7.8	1		

Dependencies to look-up tables or external data:

This check will require access to a table containing input data (median ratio of emissions to loads entering per pollutant and treatment level) for calculating releases. Loads entering the UWWTPs are

C2.3 – Cross pollutant check for releases into water in underground mining and food processing

Rationale:

There is a correlation between declared releases of different pollutants in water for certain types of activities. This is particularly the case for facilities from the underground mining and food processing sectors, as highlighted by a previous ETC study on cross-pollutant relationships. This check will use historical values reported by countries for those sectors to identify a correlation between pollutants and detect potentially missing releases or outliers per facility.

Checking rules:

This check is carried out at the facility level. It is applied to PollutantReleases to water:

- of As, Pb and Zn for facilities falling under activity 3.(a) “Underground mining and related operations”
- of Total-phosphorus and Total organic carbon for facilities falling under activity 8.(b) “Treatment and processing intended for the production of food and beverage products”, 8.(b).(i) “...Animal raw materials (other than milk)” and 8.(b).(ii) “...Vegetable raw materials”.

This check is limited to those combinations of pollutants having a level of correlation of $R^2 > 0.75$. R is the so called coefficient of correlation, a quite common statistical measure used as indicator for the level of correlation that exists between variables, in this case between sets of two coexisting pollutants released to water from the same facility and the same year. The value of R can lay between 0 and 1. At $R = 0$ there is no correlation and at $R = 1$ there is a full correlation between the co-existing variables. Its squared value, R^2 (coefficient of determination), gives a measure of how well a variable can be predicted from another variable.

The check consists of the following steps:

1. The first step consists in listing all combinations of pollutants per activity (3.(a) and 8.(b)). For example, activity 3.(a), combinations are : (As,Pb) , (As,Zn) , (Pb,Zn),
2. For each couple of pollutants, a data set is constituted with emissions values of each facility and year (during 3 rolling years),
3. The coefficient of correlation R is calculated on this data set,
4. Only couple of pollutants with coefficient of correlation squared $R^2 > 0.75$ are kept (i-e: $R \approx 0.87$)

$$R^2 > 0.75 ?$$

5. For couple of pollutants with $R^2 > 0.75$, a ratio of emissions is calculated

$$Ratio_{(Pollutant A,pollutant B)} = \frac{Emission_{Pollutant B}}{Emission_{Pollutant A}}$$

6. The median of ratios per couple of pollutants is calculated,
7. For each pollutant belonging to a selected couple, a theoretical value is calculated based on the real emission value of the other pollutant and the corresponding ratio.

$$Theoretical\ value_{Pollutant B} = Emission_{Pollutant A} * Ratio_{(Pollutant A,Pollutant B)}$$

$$Theoretical\ value_{Pollutant A} = Emission_{Pollutant B} * \frac{1}{Ratio_{(Pollutant A,Pollutant B)}}$$

8. A two-sided range is defined around the calculated potential release with a factor 10
9. For each calculated release, two types of issue are flagged:
 - An E-PRTR release (>0) has been reported for the considered pollutant:
 - The reported value is considered as an outlier if it falls outside the two-sided range.

- No release has been reported under E-PRTR for the considered pollutant:
The missing pollutant is considered as an issue if the lower bound of the range is above the pollutant threshold value.

3 General rule

To avoid repeated requests, replies from countries retrieved from the findings logs of the previous years will be taken into account considering expert judgement. If issues have already been identified and justified in previous reporting years, EEA and ETC-ATNI reviewers will either not flag them for some well-known cases or ask Member states to confirm or update their comments.

4 Findings Log


Findings of the checks detailed within this document will be communicated via a 'Findings Log', sent to the reporting countries via an email to a designated representative or access through the EIONET. Reporting countries should respond to each individual finding and return/re-upload an edited version of the findings log. More detail on how individuals should use the Findings Log is provided below.

The Findings Log is an Excel file, with 5 tabs; 'Info', 'The findings log explained' and separate tabs for 'Temporal findings', 'Activity-related findings' and a tab listing the 'Thresholds for checks'.

The info tab contains the country, the date the xml-file was uploaded, the reporting year, and any notes written by the reviewer. Reporting countries should then provide the names and email addresses of 'Respondees', those who have provided responses to the findings. It also gives some general instructions to the reporters. The info table is displayed below.

A		B	
1	Findings-log for the EPRTR-LCP post-submission checks		
2	Reporting country:	France	
3	Reporting date:	2019-09-30	
4	CDR envelope (URL):	https://cdr.eionet.europa.eu/,,,,	
5	Reporting year:	2018	
6	Notes:		
7	Respondee(s):	Please fill in information	
8	Respondee email(s):	Please fill in information	
9	Instructions for completion of findings log:	Reporting countries are expected to review the reported findings and investigate the issue to assess whether information needs to be amended. The findings of the investigation should be summarised in the fields 'Response by country' and 'Comment by country' in the log. Countries should indicate whether or not a finding is of relevance and how it will be addressed or if it needs more detailed investigation. EEA will register and keep track of these country responses, aiming to avoid repetitive feedback to the country on the same but earlier clarified findings year after year. In the 'response by country' field the reporters should select one of the options from the dropdown list and provide further evidence/details in the 'comment by country' field.	
10		The rationale and procedure for the checks is described in the EPRTR-LCP manual for post-submission checks	
11		Please do respond to the findings in the 'Temporal findings' sheet	
12		Please do respond to the findings in the 'Activity-related findings' sheet	
13	Manual for post-submission checks:	http://cdr.eionet.europa.eu/help/,,,,	
14	EEA-contact:	Ian Marnane / Bastian Zeiger	
15	EEA-contact email:	Ian.Marnane@eea.europa.eu / Bastian.Zeiger@eea.europa.eu	
16	ETC/ATNI-contact:	Torleif Weydahl	
17	ETC/ATNI-contact e-mail:	tow@nilu.no	
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European Environment Agency
European Topic Centre on Air pollution,
transport, noise and industrial pollution



Info	The findings log explained	Temporal findings	Activity-related findings	Thresholds for checks	+
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The “findings log explained” tab gives a general overview of the various fields in the findings log. It also specifies how the country response should be given. Finally, some general information on how the mapping between E-PRTR and LCP has been performed is given.

Explanation of columns in the 'Findings Log' and its intended use by countries

Explanation of columns in the 'Findings Log' and its intended use by countries	
Finding details	<i>Fields describing the finding</i>
Finding_ID	An id identifying the finding for the specific entity and reporting year.
CDR_envelope (URL)	The URL of the CDR Envelope as place holder of the (re)submitted data file on CDR for the E-PRTR and IED obligations on the legal basis of CID 2018/1135/EU
Check_ID	An identifier for each check for reference in the Manual for Procedure
Check Name	Short title of each check
Country	Country name
localId	Where relevant, the EU-registry local Id (the Inspire Id) is given
Top polluter	A boolean indicating if the facility or LCP is defined to be among the top polluters
Finding	A text describing the finding
Additional comment	If necessary an additional comment by the ETC/EEA expert reviewer will be given
Reference data label	The label of the reference data used for comparison is described
Reference data	The reference data used for comparison is given
EPTR-LCP data label	The label of the EPTR-LCP data used for comparison or individual evaluation (in specific checks)
EPTR-LCP data	The EPTR-LCP data used for comparison or individual evaluation (in specific checks)
Country response	<i>Fields to be filled out by the country indicating what and how they will handle and/or solve the observed issue.</i>
Response by country	There are three drop down responses to choose from Data confirmed to be correct Data needs correction Further investigations needed by country
Comment by country	A free formatted text field for any type of written response by the country on the finding and the planned actions envisioned to solve the issue
General info	<i>Description of how the mapping between E-PRTR /LCP-register and EU-Register has been performed for the data of the reporting country</i>

Reporting countries are expected to review the reported findings and investigate the issues to assess whether information needs to be amended. The findings of the investigation should be summarised in the fields 'Response by country' and 'Comment by country' in the log. Countries should indicate whether or not a finding is of relevance, how it will be addressed or if it needs more detailed investigation. EEA will register and keep track of these country responses, aiming to avoid repetitive feedback to the country on the same but earlier clarified findings year after year. In the 'response by country' field the reporters should select one of the options from the dropdown list and provide further evidence/details in the 'comment by country' field. The options in the drop down list are given in Table 1 below.

Possible Responses by country

Option	Meaning/interpretation
Data needs correction	The data is confirmed to be incorrect and will be corrected. In most cases this implies a re-submission of the data file.
Data confirmed to be correct	The reporting country has evaluated the finding and found the data to be correct.
Further investigations needed by country	The finding requires further investigations by the country. Feedback on the finding will be given at a later stage.

5 Annexes

Annex I – List of specific pollutants

Definition	Notation	Air	Water
Carbon dioxide	CO2	X	
Cadmium	CD AND COMPOUNDS	X	X
Lead	PB AND COMPOUNDS	X	X
Mercury	HG AND COMPOUNDS	X	X
Nickel	NI AND COMPOUNDS		X
Nitrogen oxides	NOX	X	
Non-methane volatile organic compounds	NMVOC	X	
Sulphur oxides	SOX	X	
Total Organic Carbon	TOC		X
Total Nitrogen	TOTAL NITROGEN		X
Total phosphorus	TOTAL PHOSPHORUS		X
PM₁₀	PM 10	X	

Annex II – Treatment Level of UWWTP

The following three treatment processes are distinguished in the UWWTP database:

- **Primary treatment (PT):** Treatment of urban waste water by a physical and/or chemical process involving settlement of suspended solids, or other process in which the BOD5 of the incoming waste water is reduced by at least 20% before discharge and the total suspended solids of the incoming waste water are reduced by at least 50%.
- **Secondary treatment (ST):** Treatment of urban waste water by a process generally involving biological treatment with a secondary settlement or other process.
- **Tertiary treatment (TT):** Treatment of urban waste water by any process and/or disposal system which after discharge allows the receiving waters to meet the relevant quality objectives and the relevant provisions of this and other Community Directives. Other treatment is considered as more stringent treatment.