

European Environment Agency



# Reporting of production volume under the E-PRTR/LCP streamlined dataflow

Frequently asked questions (FAQ) document

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Version 1.1 – 2024

## 1.1 Introduction

This FAQ document is designed to assist EU Member States' reporters in accurately and efficiently reporting data on Production Volume under the E-PRTR Regulation, which is established by the European Commission Implementing Decision 2022/142 ([CID \(EU\) 2022/142](#)).

This FAQ will cover a wide range of topics, from general questions to more specific queries related to specific sectors. We aim to provide clear and concise answers to help users navigate the complexities of E-PRTR reporting.

By addressing both general and sector-specific questions, we hope to support reporters to fulfill their obligations under the E-PRTR Regulation while ensuring data accuracy and consistency across the EU.

## 1.2 General questions

### **Is reporting of Production Volume mandatory?**

Yes, reporting of Production Volume quantity is mandatory in case a Production Facility is reporting any thematic information (pollutant release, off-site pollutant transfer or off-site waste transfer) above the reporting threshold defined in the E-PRTR Regulation.

### **Are there any definitions and general rules available?**

Yes, both definitions and general rules are defined in the [CID \(EU\) 2022/142](#).

### **Is there a predefined list of units to indicate Production Volume quantity?**

Yes, the units have been determined in the [CID \(EU\) 2022/142](#) and included under the [UnitCodeValue](#) Data Dictionary entry of the E-PRTR/LCP dataflow.

The unit to be selected are the one which have an explicit reference to the relevant E-PRTR Annex I activity.

E.g.: in case of a facility which has reported as main activity 1(c), the unit GJ\_1(c) is expected to be reported. The use of GJ will result in a blocker.

### **Is it mandatory to use the units included in the CID (EU) 2022/142?**

Yes, reporting of units not included in the CID and not listed in the EEA Data Dictionary will result in a blocking error and therefore the submission cannot be performed. If any Member States collects data with a different unit should convert them in the requested one.

### **Is there a Manual for Reporter that support the reporting of Production Volume?**

Yes, [the E-PRTR/LCP Manual for Reporters \(MfR\) \(v.1.6\)](#) includes relevant information on how to report Production Volume; practical examples are presented in Annex 2 of [Quality Assurance Logic Manual \(v7.0\)](#).

### **How many Production Volume quantities should be reported?**

At least one by choosing the unit of the E-PRTR Annex I main activity reported under the EU Registry for the given facilities. Additional quantities might be reported according to the units of the other activities reported for the facility.

### **Can multiple Production Volume quantities be reported in case of single activity reported?**

No, to report multiple values of Production Volume the main activity and other activities should be reported at facility level in the EU Registry.

### **How the selection of unit should be made?**

The selection of the reporting unit should be done according to the E-PRTR Annex I Main activity reported for the facility in the EU Registry. In many cases the choice is very straightforward, in some other cases there is the possibility of making a choice.

In case the Annex I activity is reported at an aggregate level, e.g. 4(a), the choice of the production volume unit cannot be done to a more detailed level of information, e.g. TOP\_4(a)(i); on the other hand, if the main activity is reported to a detailed level, e.g. 4(a)(i), the production volume unit can be reported as either TOP\_4(a) or TOP\_4(a)(i).

Let's look at the chemical sector for example and narrow down possible scenarios.

- Scenario 1: facility has reported only the main activity, and it is reported as 4(a).
  - Only one production volume figure is expected.
  - In this situation the only unit that should be reported is TOP\_4(a). Any other value will fail the QA check.
- Scenario 2: facility has reported only the main activity, and it is reported as 4(a)(ii).
  - Only one production volume figure is expected.
  - In this situation the Production Volume Unit can be chosen between two possible values: TOP\_4(a) or TOP\_4(a)(ii).
- Scenario 3: facility has reported the main activity (as 4(a)) and one other activity (as 4(a)(ii)).
  - At least one production volume figure is expected, a second production volume figure will be accepted.
  - One production volume unit is expected as either TOP\_4(a); the second production volume must be TOP\_4(a)(i).
- Scenario 4: facility has reported the main activity (as 4(a)(i)) and one other activity (as 4(a)(ii)).
  - At least one production volume figure is expected, a second production volume figure will be accepted.
  - One production volume unit is expected as either TOP\_4(a) or TOP\_4(a)(i); the second production volume should be TOP\_4(a)(ii)
- Scenario 5: facility has reported the main activity (as 4(a)(i)) and one other activity (as 5(d)(i)).
  - At least one production volume figure is expected, a second production volume figure will be accepted.
  - One production volume unit is expected as either TOP\_4(a) or TOP\_4(a)(i); the second production volume, if reported, should be either TOP\_5(d) or TOP\_5(d)(i).

## 1.3 Sectorial questions

### 1.3.1 Energy

**An operator declares multiple production volume, but the facility is running only one main activity (e.g. 1c). What should be reported?**

In case a power plant provides multiple production volume figures, e.g. net electricity feed-in (in MWh) and the net-heat output district heating (in MWh), the reporting of production volume should add the two figures. We do recommend reporting in the “Comments” field the underlying information to be able to get this additional information.

### 1.3.2 Metal

**Surface treatment – In case of activity 2(f), which figure should be considered when reporting Production Volume: the volume of the whole bath or just the amount of the active product?**

The identification of this reporting requirement is very complex, and it is not easy to simplify. In principle we see the reporting requirement as the quantity of surface treatment substances in ready-for-use state.

Soluble anodes should be included in the calculation, as they dissolve to replenish the metal deposited from the solution (electrolyte) on to the parts.

As for directly associated processes (DAA), they may have impact on consumptions and emissions and are considered in the frame of the BREF making process. DAA such as powder coating does not fall under activity 2(f) but if the pre-treatment steps (e.g. pickling, etching, conversion coatings) exceed the threshold set in 2(f) and are taking place in the installation, then it could be considered that those chemicals (for the pre-treatment steps) may be counted.

Please do not hesitate to contact us at [industry.helpdesk@eea.europa.eu](mailto:industry.helpdesk@eea.europa.eu) for specific complex cases that require further assistance.

**Surface treatment – how the 30m<sup>3</sup> threshold should be considered? Per treatment or the total volume of all treatment bath?**

This question is related more to the capacity threshold of the activity rather than reporting production volume.

If an operator carries out several activities falling under the same Annex I activity at the same facility on the same site, the capacities of such activities are added together (e.g. the treatment volumes of vats). The production capacities of the individual activities should be aggregated at the Annex I activity level. The sum of the capacities is then compared with the capacity threshold for the specific Annex I activities as listed in Annex I of the E-PRTR Regulation.

### 1.3.3 Mineral

**Mining – For activity 3(a) and 3(b), what should be considered as “extracted material”?**

To establishing the units and metrics to be reported by Member States under field 2.12 “Production volume”, the Commission Implementing Decision CID 2022/142 defines “tonnes of products/extracted material” as, “unless otherwise stated, the weight of the stated metric, including any inherent moisture content of the products or extracted material, but excluding any product packaging/containment”.

When assessing environmental impacts from extraction and treatment of industrial or metallic minerals, one investigates the type of processes applied and thus the mineral type and conditions of the deposit. Two key criteria determine environmental impacts of the extraction activity:

- The processes used: where water and chemicals are used, the environmental impacts are much higher than when only physical methods are used.
- The production capacity: the magnitude of the environmental impacts is typically proportionate to the production capacity, i.e. the more is extracted, the higher the impact.

Production capacity is therefore a criterion to consider when determining “production volume” for the purpose of reporting under the Regulation. Taking a copper mine as an example, it will be the amount of extracted ore as the more is extracted, the higher environmental impact on spot and from processing the ore (energy to crush, chemicals used in flotation process, etc).

#### 1.3.4 Chemical

**Pharmaceutical products – Should packaging material (e.g. syringe) be considered or only the actual product (e.g. insulin, pills)?**

No, packaging should not be included.

#### 1.3.5 Waste

**Waste management – Definition of “incoming waste” - Do the following cases apply?**

1. **Waste produced in the facility itself,**
2. **Secondary waste produced at the facility during sorting – For example when demolishing old vehicles, various groups of secondary waste would arise**
3. **Stored waste from previous years that is recovered or treated in a different year**
  - 1- Waste produced in the facility: This should be considered only if it is treated onsite.
  - 2- Secondary waste produced at the facility during sorting: No – there is risk of double counting, and this seems to be the result of sorting, classifying etc which does not create more tonnes of waste but just characterises the existing waste.
  - 3- Stored waste from previous years: No. Otherwise we are not accounting for ‘incoming waste’ (see definition in CID 2022/142).

**Non-thermal waste treatment – A facility is reported with main activity 5(a) but treats both Hazardous and Non-hazardous waste: what should be considered in reporting Production Volume?**

The E-PRTR Regulation establishes that operators need to report emissions from the pollutants in Annex II if emitted above the threshold, from **all Annex I activities present** at the facility.

Ideally, operators should report both main and other activities if these are above the capacity thresholds. If that is the case, then ideally one production volume figure should be reported by activity (although this is not compulsory in the CID).

In the cases, where the capacity threshold is exceeded only in one activity, the EEA estimates that most operators will provide one figure for the amount of incoming waste. It is also the case of emissions, where they will be reported for the facility as a whole and not only by the activity declared as main activity. The field “Comments” can be used to differentiate the amount of non-hazardous waste reported in a facility

declaring only 5(a) as its activity. It is expected that it will not be a large amount since it would not usually be classified as having the recovery or disposal of hazardous waste as the main activity.

Note that when waste comes in the facility **only** to be transferred again without treatment this should not be counted as “incoming waste” for the purpose of reporting production volume. This is included in the definitions of the CID 2022/142:

*“tonnes of incoming waste” means the weight of all incoming waste, within a calendar year, to a facility that is further dealt within the defined recovery or disposal activity performed by the same facility and which excludes waste quantities transferred to other facilities without treatment;*

### **Wastewater treatment – which volume of incoming wastewater should be considered?**

According to the definition listed in the CID, the key element to be considered is the volume of water that enters the treatment operations of the relevant wastewater treatment facility. What is in the scope of the reporting is what gets treated, because that is what may influence the emissions coming up and reported as pollutant releases.

### **Waste management – in what circumstances could production volume be zero?**

The only cases the EEA is aware of are the following:

- Landfill that is in the closure phase (it has initiated procedures to be decommissioned) and therefore does not accept more waste, it may be reported with the status of “disuse” as a result, but national authorities still report emissions.
- Disused facility that is in the process of dismantling. The corresponding national competent authority reports waste transfers because of the demolition waste that is created during the dismantling of its installations. However, there is no production (the facility is not functional).

#### **1.3.6 Intensive livestock farming**

### **Should we consider “animal places” or “animal kept during reporting year” when reporting Production Volume?**

Total production should be considered (outputs), rather than animal places (capacity) available or otherwise occupied by the animals, which would be more relevant for the capacity threshold of the farms.

### **In case of a mixed farm with capacity threshold exceeded for only one animal, what must be reported?**

According to the Industrial Emissions Directive (IED), there are aggregation rules for activities in scope to avoid that operators would artificially split e.g. a pig farm to avoid being regulated as an IED activity. However, and as noted in the by the Commission in earlier guidance on the IED aggregation rules (published in 2019 referring to the 2010 version of the IED), these aggregation rules do not apply across different animals.

This means that if the farm only exceeds the threshold for one animal, then it is considered to be mainly performing that activity, with other animals being a directly associated activity of the IED farm, since it contributes to its emissions and environmental impact.

**What LSU conversion factors do apply, those mentioned in CID 2022/142 as included in Annex II of Commission Implementing Regulation (EU) No 808/2014, or those in the IED 2.0 (Directive 2024/1785 amending Directive 2010/75/EU)**

The factors mentioned in the IED 2.0 prevail and should be used. It should be noted, however, that for the animals in the scope of the E-PRTR Regulation (which applies until 2028), the factors are the same.