

EU Registry on Industrial Sites – Post-Submission Review

Manual of Procedure

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Version control

Version number	Date	Description
0.1	March 2018	First draft for EEA
0.2	May 2018	Second draft for EEA, integrating EEA comments
0.3	May 2018	Third draft for EEA, integrating comments from internal ETC review
0.4	August 2018	Fourth draft for EEA, integrating the results of the post-submission review of reports submitted during the testing phase.
1	October 2018	Final draft for publication
1.1	March 2019	Revised draft for publication, integrating new checks as proposed through internal ETC/EEA process
1.2	April 2019	Revised after comments from ETC/EEA
1.3	April 2019	Revised after second round of comments from ETC/EEA
1.4	September 2019	Revised with updated procedures and information on the specific and transitional checks. This is the first stable version and the first one used for post-submission checks at all.
2.0	January 2020	The maximum distances used for check C3.2 have been revised to reduce the occurrence of false positives. These new distances will be used during post-submission checks as of 1 January 2020.

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1 Introduction

The EU Registry on Industrial Sites (hereafter the EU Registry), represents a new reporting stream that facilitates the annual reporting to EEA of administrative and identification data pertaining to sites and facilities defined under the European Pollutant Release and Transfer Register Regulation 2006¹ and installations, large combustion plants (LCPs) or waste incinerators covered under the Industrial Emissions Directive 2010². 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 data. These checks go beyond the automated QA/QC checks already within the central data repository (CDR), the reporting platform used for the EU Registry. The logic behind those automated checks is discussed within the EU Registry Quality Assurance Logic document³. This manual builds upon that document and references the data model as defined in the streamlined view of the EU Registry. This document is likely to be substantially amended over time as assessments of submissions become available through reporting, in turn allowing the identification of potential additional aspects where further post-submission checks need to be implemented.

The checks proposed within this document can be split into three groups:

1. **Transitional checks** – It is important to recognise that the data reported under the EU Registry is currently reported under two other data flows, E-PRTR reporting and LCP reporting. The first reporting round of the EU Registry therefore represents a transition from these separate reporting flows, towards integrated administrative reporting in one data flow. This requires a series of checks to evaluate whether reporting countries have correctly managed this transition and are reporting the appropriate number of industrial entities.
2. **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. These checks will only be possible in later reporting rounds when there is more than one reporting year to analyse.
3. **Specific checks** – These checks analyse specific aspects of reporting to determine whether they have been reported correctly. Unlike temporal checks, these checks can be performed for each reporting round without the need to also analyse related data reported in previous reporting rounds. Historical data will be transferred into the database in the future, but this can only happen after the first reporting year once Inspire IDs have been assigned to existing facilities and installation parts.

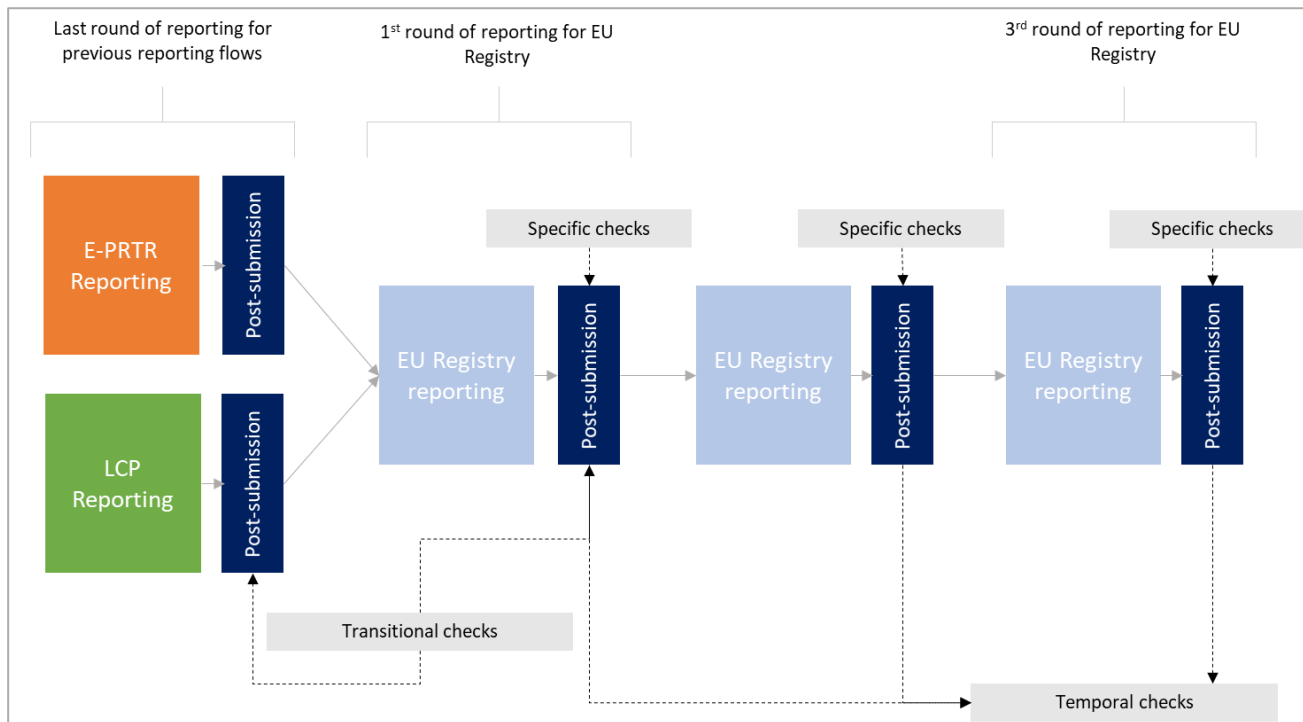
Checks within each group are systematically detailed in the sections below. Figure 1 below helps to illustrate the role each check group has in the reporting process. Due to the number of entities reported, it may not be possible to perform all checks on all entities reported. The checks detailed below therefore each have 'prioritisation criteria' to ensure that the most important entities will be evaluated.

¹ Regulation (EC) No 166/2006, European Pollutant Release and Transfer Register, Available at: <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32006R0166>

² Directive 2010/75/EU, Industrial Emission Directive, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010L0075&from=EN>

³ Documents and other materials (e.g. schema documents) referenced in this manual can be found on the EU Registry website - <https://cdr.eionet.europa.eu/help/euregistry>

Figure 1 - Reporting flow over time and the role of each check group.



It is envisaged that the first round of reporting to the EU Registry will focus primarily on ‘transitional checks’ and on ‘specific’ checks that will help refine the future design and optimisation of the automated checks presented in the EU Registry QA/QC Logic document which are integrated into the Central Data Repository (CDR). Future reporting rounds for later reporting years may incorporate more ‘temporal’ checks as further data becomes available. The findings of each check will be communicated to the reporting countries via a findings log. In some select cases, it may be useful also to facilitate a bilateral discussion on issues.

The submission process includes a series of automated quality assurance checks in the central data repository (CDR). These automated checks are detailed extensively in the EU Registry’s Quality Assurance Logic document. Each submission released in the CDR also contains metadata regarding the checks, which have been flagged in respect to warning or information messages. This metadata can be consolidated allowing a holistic view of what checks have been consistently flagged across submissions. This can then be used either as prioritisation criteria, to develop further specific post-submission checks, or to inform the refinement of the automated checks.

Historical data, i.e. data from E-PRTR/LCP reporting from 2016 and older, will be transferred into the EU-Registry after the first reporting year. This historical data set will not be open to re-submissions and is hence locked for the future. Administrative and thematic data from 2017 and onwards may be re-submitted to the EU-Registry. The EU-Registry relies on consistency between submissions with respect to data that identifies entities and the relation between them. When re-submitting data for a year prior to the latest reported data, consistency with later years must be ensured (see Check 3.9).

2 Transitional checks

These checks will be performed in the first round of reporting for the EU Registry and will help determine how successfully reporting countries have transitioned from the previous reporting flows. These checks, therefore, require access to the data reported in the final reporting rounds (submitted in March 2019) of the E-PRTR and LCP data flows. The following checks are proposed:

C1.1 – Polluters transition

Rationale:

Generally, it is important that all entities from E-PRTR and LCP reporting are transferred to the EU-Registry, and in particular those with the highest levels of emissions. A number of ‘top polluters’ have been identified through the previous reporting flows. These are industrial entities for which their pollutant releases or waste transfers contribute a significant proportion of the pollutant totals across Europe. It is particularly important that these entities, if still operating, are correctly incorporated into the EU Registry.

Procedure:

A list of ‘top polluters’ for the most recent reporting year for both E-PRTR and LCP reporting will be compiled with input from the EEA. For E-PRTR reporting this will account for the top polluters according to each medium, across multiple years of reporting. The list of ‘top polluters’ is compiled by the following procedure:

- For each E-PRTR facility consider the sum of emission for the 7 last years including 2017 for a selected set of water and air pollutants⁴
- For each air and water pollutant select the 50 top polluting facilities across all countries
- Combine these top lists for all pollutants, remove duplicates, and only consider the ones reported in the March 2017 data.

This list will then be evaluated against the EU Registry. Comparisons will be made on the names of entities. If the name in previous reporting does not identify an entity within the EU Registry, a comparison will be made using address and coordinates.

If the E-PRTR National IDs have been used in the EU-Registry reporting, an evaluation of the transfer of *all* polluters are performed using these. Several plants in the LCP-register can share the same NationalID and several Installation parts can belong to the same facility in the EU-Registry. Hence, for the LCPs a one-to-one match will be performed to the extent possible.

Follow up action:

If any ‘top polluters’ are not found within the EU Registry, this will be flagged to reporting countries via the findings log.

Prioritisation criteria:

As this check considers ‘top polluters’, unless a match through National IDs is feasible, the check inherently prioritises those entities for which emissions or releases are significant across Europe and to which resources for carrying out this check should be allocated first.

C1.2 – Polluters transition data comparison

Rationale:

Generally, it is important that the information on all polluters from E-PRTR and LCP reporting is correctly transferred to the EU-Registry. A number of ‘top polluters’ have been identified through the previous reporting flows, and it is particularly important that these entities, if still operating, are correctly reflected in the EU Registry in respect to the data associated with the entity.

Procedure:

This check will build upon Check 1.1, which identifies ‘top polluters’ from the previous data flows within the EU Registry. Once the ‘top polluters’ are identified within the EU Registry, a comparison can be made on similar aspects of reporting

⁴ See the selected pollutants defined under <https://www.eea.europa.eu/themes/industry/industrial-pollution>

between the EU Registry and previous data flows. This check will compare aspects like address, naming, coordinates and, for E-PRTR facilities, activity.

When the E-PRTR National IDs are used in the EU-Registry reporting, this check is extended to check *all* the E-PRTR facilities that are found in the EU-Registry. This enables also an extended comparison for the LCPs.

The check contains four parts:

- C1.2a Annex I Activity (E-PRTR facility only)
- C1.2b Name of E-PRTR facility/ LCP plant
- C1.2c Address of E-PRTR facility/ LCP plant
- C1.2d Coordinate comparison of E-PRTR facility/ LCP plant

The name and address comparison is made by calculating the “edit distance” relative to the length of the name/address. For postal codes any differences in numbering are flagged. Certain thresholds are established for unacceptable distances, differences in names and addresses between the EU-Registry and E-PRTR and LCP dataflows. These are described in the findings log.

Follow up action:

If discrepancies, which may impact future reporting, are found between similar reporting aspects, these will be flagged to reporting countries via the findings log.

Prioritisation criteria:

As this check considers ‘top polluters’, unless a match through National IDs is feasible, the check inherently prioritises those entities for which emissions or releases are significant across Europe and to which resources for carrying out this check should be allocated first.

C1.3 – First time reporting E-PRTR Facilities

Rationale:

Under the previous E-PRTR reporting, reporters did not generally report facilities which had releases below the Annex II thresholds. Under the EU Registry the requirement to report all facilities above the Annex I of the E-PRTR Regulation (No. 166/2006) activity thresholds, even if the releases and transfers are below the relevant reporting thresholds in Annex II, is being implemented more stringently. Therefore, a facility must be reported to the EU Registry if it carries out a relevant activity as defined in Annex I of the regulations, even if the emissions are below the thresholds in Annex II. This means the first year of reporting to the EU Registry (submitted in June 2019) may well include a number of E-PRTR facilities that have not featured in previous (submitted in March 2019) E-PRTR reporting. It is important to establish the extent to which this occurs, as this will inform the potential set of facilities for which no previous data has been defined.

Procedure:

For each reporting country the number of E-PRTR facilities reported under the E-PRTR regulation in March 2019, will be compared to the number of facilities reported to the EU Registry in June 2019. This comparison will be completed in respect to the individual E-PRTR main activities in addition to the overall total number of facilities.

The check contains two parts:

- C1.3a: Check that the total number of production facilities in the EU-Registry is larger than the number of facilities in the E-PRTR reporting
- C1.3b: Check that the total number of production facilities in the EU-Registry is larger than the number of facilities in the E-PRTR reporting for each Annex I activity

Follow up action:

This check is for informative purposes and will inform the EEA on the impact of the threshold change. If there are specific reporting countries with large changes relative to other reporting countries, this may be discussed bilaterally.

Prioritisation criteria:

No prioritisation criteria required.

C1.4 – LCP comparison

Rationale:

The thresholds that define reporting for LCPs have not changed between the EU Registry and previous LCP reporting. This means the resulting number of LCPs reported in the first year of reporting to the EU Registry should not differ from the number reported in the LCP data flow. In addition the data should be comparable, such as the thermal input of the LCPs.

Procedure:

For each member state the number of LCPs reported to the EU Registry (June 2019) as installation parts will be compared to the number reported to the previous (March 2019) LCP reporting, and the total sum of thermal input will be compared.

The check contains two parts:

- C1.4a: LCP total number comparison
- C1.4b: LCP total sum of thermal input comparison

Follow up action:

If there are significant variation between the two totals for any specific member state, this will be raised with the member state via the findings log.

Prioritisation criteria:

No prioritisation criteria required.

C1.5 – IED comparison

Rationale:

Installations under the scope of the Industrial Emission Directive (IED) Annex I will be reported to the EU-Registry. Unlike industrial facilities reported under the E-PRTR, there has not been any common central European reporting of IED-installations in the past. One recent study, which compiles IED-data for analysis, is the “Industrial emissions policy country profile”⁵ developed for the European Commission covering the EU-28 countries.

Procedure:

Compare the number of IED installations in the “Industrial emissions policy country profiles” reports with the total number reported to the EU-Registry for each country. When there is significant differences, identify the sectors with the largest discrepancies to the “Industrial emissions policy country profiles”.

Follow up action:

If there are significant variation between the two totals for any specific member state, this will be raised with the member state via the findings log.

Prioritisation criteria:

No prioritisation criteria required.

C1.6 – No changes to submission

Rationale:

In the first year of reporting (2019) the reporting burden for the reporting countries is higher than average, with two consecutive submissions to the EU-Registry in addition to the last year of E-PRTR and LCP reporting. It is anticipated that some countries could submit exactly the same envelope for the June and September submissions. In that case, one can expect the countries to re-submit the September submission at a later stage. It is useful for EEA to know when this is the case.

⁵ Ricardo Energy & Environment, March/April 2018, “Industrial emissions policy country profile -”, Available at https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/59ecee4a-dbee-49e9-b360-2a2b4d29d39a?p=1&n=10&sort=modified_DESC

Procedure:

The June submission with 2017 data and the September submission with 2018 data will be compared to see if there are any changes.

Follow up action:

If no changes are found, a comment will be added to the findings log. EEA will further expect the September submission to be resubmitted before the 2018 thematic data is reported in 2020.

Prioritisation criteria:

No prioritisation criteria required.

C1.7 – Number of LCP emission limit value derogations

Rationale:

Article 32 (for SO₂, NO_x and dust), Article 33(1) and Article 33(3) of the IED allows competent authorities to set, under certain specific circumstances, less strict emission limit values for LCPs. These derogations are reported to the LCP-register for the last time in March 2019 (2017-data).

Procedure:

It is expected that the number of reported derogations for LCPs to the EU-Registry in the June 2019 reporting (2017-data) is equal to the 2017-data reported to the LCP-register in March 2019.

The check contains three parts:

- C1.7a: Number of LCP limit value derogations under Article 32
- C1.7b: Number of LCP limit value derogations under Article 33
- C1.7c: Number of LCP limit value derogations under Article 34

Follow up action:

If the number of reported derogations is different from the LCP-register, this will be raised with the member state via the findings log.

Prioritisation criteria:

No prioritisation criteria required.

C1.8 – Number of BATAEL derogations

Rationale:

Article 15(4) of the IED allows competent authorities to set, under certain specific circumstances, less strict emission limit values in the permit than the emission levels associated with the best available techniques (BAT). The number of BATAEL derogations for the EU-28 countries has been mapped in a study named “Application of IED Article 15(4) derogations”⁶ performed for the European Commission DG-ENV in 2018. Countries are expected to report derogations to the EU-Registry from the September submission (2018 administrative data) and onwards.

Procedure:

For the countries that report derogations to the EU-Registry the total number of reported derogations under Article 15(4) is compared with the report⁶ for DG-ENV.

Follow up action:

If the number of reported derogations is lower or significantly higher than the number in the DG-ENV report, this will be raised with the member state via the findings log.

Prioritisation criteria:

No prioritisation criteria required.

⁶ Amec Foster Wheeler Environment & Infrastructure UK Limited “Application of IED Article 15(4) derogations”, March 2018, Available at https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/e95a41c7-a4dd-4f58-9543-9693ba73e572?p=1&n=10&sort=modified_DESC

3 Temporal checks

C2.1 – Permit frequency

Rationale:

Permits for IED installations reported to the EU Registry are characterised by certain ‘permit actions’. These actions follow a logical order of granted, reconsidered, and updated. A post-submission check can evaluate the frequency of these actions, in turn informing upon the differences in the permit regimes between reporting countries. Such an evaluation can help to standardise the way in which these actions are interpreted.

Procedure:

The EU Registry database, once populated with data from at least three reporting rounds, will be evaluated. Those installations where at least two permit actions have occurred will be highlighted for each reporting country. The number of these installations will be divided by the total number of installations reported for each reporting country, producing a percentage. Percentages for each reporting country will be compared, and those reporting countries with a percentage significantly below the average will be flagged. This analysis will also be completed at the sector level to provide analysis of permit actions within individual sectors.

Follow up action:

The findings of this check will be compiled into a summary and passed on the European Commission for information purposes.

Prioritisation criteria:

No prioritisation criteria required.

C2.2 – Inspection frequency

Rationale:

For IED installations, the number of site visits is reported to the EU Registry. A post-submission check can highlight installations which have not been subject to inspection for a number of years but may have had permit actions. This could help inform about the differences in the permitting regimes across reporting countries, and the extent to which inspections are linked to permit actions.

Procedure:

The EU Registry database, once populated with data from at least three reporting rounds, will be evaluated. Those installations where inspections have occurred, will be identified and evaluated for each reporting country. Those installations which have extensive inspections, but limited permit actions will be flagged. Those with no inspections should also be flagged.

Follow up action:

Reporting countries which have been flagged will be informed via the findings log, and there may be a need for bilateral discussion on their specific permitting regime and interpretation of inspections in the context of the IED. Relevant issues can also be flagged to the European Commission.

Prioritisation criteria:

No prioritisation criteria required.

C2.3 – totalRatedThermalInput frequency

Rationale:

For LCP installation parts, the total rated thermal input of the plant is reported in megawatts (MW). This indicates the capacity of the plant and should remain relatively static over time. A post-submission check can analyse the frequency of changes to this value, informing the extent to which capacity is altered.

Procedure:

The EU Registry database, once populated with data from at least three reporting rounds, will be evaluated. The change in the totalRatedThermalInput attribute across all installation parts, will be calculated in respect to both percentage of capacity and in absolute terms, and evaluated for each reporting country. Those installation parts with significant change in this attribute will be flagged.

Follow up action:

Reporting countries which have been flagged will be informed via the findings log and asked to review and, if necessary, clarify how these changes have occurred.

Prioritisation criteria:

The check will prioritise those installation parts with the largest change in the totalRatedThermalInput attribute. This will be determined by a suitable percentage cut-off, once the number of flagged installation parts is known.

C2.4 – totalRatedThermalInput national average comparison

Rationale:

For LCP installation parts, the total rated thermal input of the plant is reported in megawatts (MW). This indicates the capacity of the plant and should remain relatively static over time. A post-submission check will be able to analyse how these individual capacities, when summed into a national total and averaged, compare to previous reporting years. In this manner, individual years where the average significantly differs can be flagged as anomalies.

Procedure:

The EU Registry database, once populated with data from at least three reporting rounds, will be evaluated. The totalRatedThermalInput attribute across all installation parts, will be summed and an average calculated for each reporting country and reporting year. Those reporting years where the national average significantly differs, will be flagged.

Follow up action:

Reporting countries which have been flagged will be informed via the findings log and asked to review and, if necessary, to clarify how these changes have occurred.

Prioritisation criteria:

The check will prioritise those installation parts with the largest change in the totalRatedThermalInput attribute. This will be determined by a suitable percentage cut-off, once the number of flagged installation parts is known.

C2.5 – Disused status frequency

Rationale:

The status of each facility, installation and installation part is reported within the EU Registry. The status is defined according to four options: 'operational', 'disused', 'decommissioned' and 'not regulated'. 'Disused' represents an inactive state where entities that have ceased activity but have the intention/infrastructure to resume activity at a later date. During consultation on the materials produced to support the EU Registry (Data Model Documentation, Quality Assurance Logic, Manual for Reporters), it was highlighted that the role and purpose of the 'disused' status may not be easily understood by reporting countries. A post-submission check analysing multiple submissions would be to evaluate the use of this status and whether it is being correctly utilised in reporting.

Procedure:

The EU Registry database, once populated with data from at least three reporting rounds, will be evaluated. The status of entities reported will be evaluated over time. The amount of entities which transition from operational directly to decommissioned will be compared to the amount of entities transitioning from operational to disused or disused back to operational. Reporting countries will be flagged when there is a large difference between these numbers compared to the average.

Follow up action:

Reporting countries which have been flagged will be informed via the findings log and asked to clarify the findings of the check. It may be necessary to further address this through bilateral discussion on the status attribute and its correct use.

Prioritisation criteria:

No prioritisation criteria required.

4 Specific checks

C3.1 – Coordinates to activity validation

Rationale:

Automated checks at the time of submission ensure the specified coordinates for an entity lie within the country area, however post-submission review checks could further align the Annex I Activity reported to the placement of coordinates. This is especially of value in respect to locations in offshore waters and those activities which pertain to aquaculture or fossil fuel exploration.

Procedure:

Those facilities or installations which have coordinates located in waters, will be evaluated. These entities will be determined via geo-processing with GIS software, and country geometries provided by Eurostat⁷. A list of acceptable 'on-water' and 'on-land' activities for both the IED and E-PRTR will be determined and compared against the Annex I activities reported. Facilities or installations with unusual activities relative to their offshore location will be flagged. The E-PRTR activities 1(c) 'Thermal power stations and other combustion installations' and 7(b) 'Intensive aquaculture' as well as IED activity 1.1 'Combustion of fuels' are pre-defined as 'acceptable' offshore activities.

Follow up action:

Reporting countries which have been flagged will be informed via the findings log and asked to explain the reasoning behind the chosen activity for a specific installation or facility.

Prioritisation criteria:

No prioritisation criteria required.

C3.2 – Coordinates distance analysis

Rationale:

The EU Registry Quality Assurance Logic document includes multiple checks to evaluate the distances between entities, based on the supplied coordinates; however, a manual post-submission check can be more informative. For example, it would be anticipated that the distances between connected entities would decrease progressing down the geographical hierarchy e.g. the distance between the centre point of the installation to the associated facility would be less than that of the distance between the centre point of the site to the facility. The check could also flag extreme distances and begin to analyse how these relate to Annex I activities. For example, it is anticipated that the distances between entities could be much larger in respect to 'opencast mining & quarrying' (E-PRTR Annex I Activity: 3b), than 'urban waste-water treatment plants' (E-PRTR Annex I Activity: 5f).

Procedure:

The coordinates of all entities would be used to calculate the distance between the facility and associated site, installation and associated facility, and installation part and associated installation. Based on expert judgment an acceptable maximum distance related to the main IED or E-PRTR Annex I activity associated with the complex will be established. The distance decreases progressing down the geographical hierarchy. Associated entities will be flagged

⁷ Countries 2016 shapefile, 1:10 million, CNTR_RG_10M_2016_4326, available at: <http://ec.europa.eu/eurostat/web/gisco/geodata/reference-data/administrative-units-statistical-units/countries>

when subject to large entity distances. The acceptable maximum distance (threshold) is set to 6 km for site to facility, 4 km for facility to installation and 2 km for installation to installation part.⁸

Follow up action:

Reporting countries which have been flagged will be contacted and asked to review and if necessary clarify large entity distances.

Prioritisation criteria:

The check will prioritise those entity complexes subject to the largest large average entity distances relative to the Annex I activity. This will be determined by a suitable percentage cut-off, once the number of entities flagged is known.

C3.3 – URL validity

Rationale:

The PermitURL, a parentCompanyURL, a publicEmissionMonitoringURL and a publicDisclosureURL attribute can be populated for entities reported to the EU Registry. A post-submission check could determine the validity of the URL provided.

Procedure:

Where a URL is supplied for an entity, the URL attribute will be evaluated by a macro determining whether the URL is valid, i.e., a webpage or document can be accessed. Installations where the URL is not valid will be flagged.

Follow up action:

Installations or facilities for which an invalid URL has been flagged will be communicated to the member state.

Prioritisation criteria:

No prioritisation criteria required.

C3.4 – EU-ETS & eSPIRS identifier validity

Rationale:

For each installation reported to the EU Registry the comparative entity according to EU-ETS or Seveso reporting should be supplied. The automatic EU Registry QA/QC checks C13.1 and C13.2 analyse the linkages supplied to ensure that the correct entity is referenced.

Procedure:

The number of warnings produced under QA/QC C13.1 and C13.2 on the ETS or eSPIRS identifier will be flagged.

Follow up action:

The reporting countries are asked to revise their ETS and eSPIRS identifiers, particularly if the numbers are significant.

Prioritisation criteria:

No prioritisation criteria required

C3.5 – Remarks evaluation

Rationale:

The EU Registry includes the ability to supply any additional information pertaining to an entity in the 'remarks' attribute. A post-submission check should evaluate and flag any remark of importance.

Procedure:

All entities where the remarks attribute has been populated will be evaluated. Any comment deemed important by the expert reviewer will be flagged to the EEA.

⁸ These thresholds are set from January 2020. For the findings logs distributed in 2019 the thresholds were 2 km for site to facility and facility to installation, and 1 km for installation to installation part.

Follow up action:

It may be necessary to raise certain comments to the reporters in order to advise on reporting.

Prioritisation criteria:

The check involves the manual review of the remarks field. Such a manual process may be time consuming, so it may be advantageous to review remarks associated with facilities or installation parts with significant releases or transfers. This may only be possible once thematic data is reported. In the post-submission review of the first reporting round it may be possible to use the 'top polluters' defined in check C1.1 to prioritise entities.

C3.6 – NACE to Annex I Activity comparison

Rationale:

The EconomicActivityValue or NACE code, for the respective facility is reported in the EU Registry. Certain categories align with the Annex I activities presented in the E-PRTR. A post-submission check could evaluate whether the EPRTAnnexIActivity reported for the facility aligns with the NACE code. Such a check could also be automated once the alignment between the NACE code and Annex I activity is defined. A post-submission check, however, will inform on the benefits of automating this, and the extent to which alignment does or does not occur. The mapping table of clearly defined linkages between the E-PRTR Annex I activity and NACE codes has been determined by EEA⁹.

Accordingly, the main activity occurring within the facility, can be determined either qualitatively by considering the primary purpose of the facility, or quantitatively via comparing the amounts of product generated from each activity or the economic value associated with each activity occurring. Hence, it is possible to apply different rationale when establishing the EconomicActivityValue and EPRTAnnexIActivity codes for the facilities. For this reason the check is currently not active, as further assessment is required to determine common scenarios where the EPRT activity and the NACE code activity may not align. This will prevent the reporting of large numbers of findings to reporters.

Procedure:

It is proposed that the EEA and ETC/ATNI will assess the data submitted by reporters for 2017 and identify E-PRTR activities where the NACE code may commonly be different to the E-PRTR activity code. These sectors can be excluded from this check in the future in order to produce a more refined set of findings for investigation by the reporting countries.

Follow up action:

Facilities which have been flagged will be communicated to the reporters in the findings log, once this check becomes active.

Prioritisation criteria:

No prioritisation criteria required.

C3.7 – Continuous reporting of decommissioned entities

Rationale:

A Production Facility, a Production Installation or a Production Installation Part should be removed from the EU-Registry when the entity was reported as decommissioned in previous year's submission.

Procedure:

The list of InspireIDs for the Production Facilities, Production Installations or Production Installation Parts that are reported as decommissioned for the previous year of reporting will be checked against the current reporting to see if any of these InspireIDs are found.

Follow up action:

If the InspireID of the entities reported as decommissioned in the previous year of reporting is still present in the current reporting then a comment will be added to the findings log.

⁹ https://cdr.eionet.europa.eu/help/nomenclature_emission

Prioritisation criteria:

No prioritisation criteria required.

C3.8 – Trailing zeros in numbers

Rationale:

The FME process (Access to GML) is removing trailing zeros in numbers and this is resulting in the Coordinate precision completeness check (automatic check 5.5) generating a warning. A large number of such warnings may mask actual issues with the data that should be flagged to the reporting countries. If the number of Coordinate precision completeness checks are large relative to the total number of reported entities, this may indicate that there are other issues present than the trailing zeros removed.

Procedure:

The number of Coordinate precision completeness checks that are flagged is compared to the number of reported entities.

Follow up action:

If the number of Coordinate precision completeness checks are large relative to the number of reported entities, this will be communicated to the reporters through the findings log.

Prioritisation criteria:

No prioritisation criteria required.

C3.9 – Inconsistencies at re-submission

Rationale:

The EU-Registry relies on consistency between submissions with respect to data that identifies entities and the relation between them. When re-submitting data for a year prior to the latest reported data, these dataset may have undiscovered inconsistencies because there is no mechanism to require QA/QC checks on later submissions. For example when re-submitting the 2017 data after the 2018 data has been reported, the reporting countries are encouraged to run through the automatic QA/QC checks on the 2018 data in order to check that the 2018 data is still consistent with 2017, but there are no mechanisms to enforce this.

Procedure:

When re-submission of data has been performed, the XML files of all later submissions, if any, will be run through the QA sandbox to check any inconsistencies. The results will be added to an additional release of the finding log that will be sent out after the re-submission deadlines.

Follow up action:

If inconsistencies are found, the countries should re-submit data.

Prioritisation criteria:

No prioritisation criteria required.

5 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 6 tabs; ‘Info’, ‘The findings log explained’ and separate tabs for ‘Transitional findings’, ‘Temporal findings’, ‘Specific 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 ‘Respondee(s)’, those who have provided responses to the findings. It also gives some general instructions to the reporters. The info table is displayed below.

Figure 2 - The info page of the findings log
Findings-log for the EU-Registry post-submission checks

Reporting country:	2019-06-27
Reporting date:	https://cdr.eionet.europa.eu/dummy.xml
CDR envelope (URL):	2017
Reporting year:	
Notes:	
Respondee(s):	Please fill in information
Respondee email(s):	Please fill in information
Instructions for completion of findings log:	<p>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.</p> <p>The rationale and procedure for the checks is described in the EU-Registry manual for post-submission checks</p> <p>Please do respond to the findings in the 'Transitional findings' sheet</p> <p>Please do respond to the findings in the 'Specific findings' sheet</p>
Manual for post-submission checks:	http://cdr.eionet.europa.eu/help/euregistry/Documents/EU_Registry_Post_Submission_Manual_for_Procedure_V1.4.pdf
EEA-contact:	Ian Marnane /Bastian Zeiger
EEA-contact email:	
ETC/ATNI-contact:	Torleif Weydahl
ETC/ATNI-contact e-mail:	

European Environment Agency
 European Topic Centre on Air pollution,
 transport, noise and industrial pollution



The finding 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 is performed for the transitional check is given. The mapping is either manual or through the E-PRTR National ID.

Figure 3 – ‘The findings log explained’ tab, found in the findings log.

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. For the relevant transitional checks, the facilityID / plantID is part of the Finding_ID
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 of 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 (transitional checks only)
Reference data	The reference data used for comparison is given (transitional checks only)
EU-Registry data label	The label of the EU-Registry data used for comparison (in transitional checks) or individual evaluation (in specific checks)
EU-Registry data	The EU-Registry data used for comparison (in transitional checks) 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 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. The options in the drop down list are given in Table 1 below.

Table 1 - Response by country –options in the ‘drop-down’ menu

Status	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.

The main findings tables details the check number, the check name, the InspireID of the entity and the finding. All of which will be populated by the reviewer if there are findings to be addressed. Reporting countries should provide their responses in the Response fields. They should then change the status according to the following table below. An example of a populated finding in the main ‘transitional findings’ table can be found below.

Figure 4 – ‘Transitional findings’ table of the findings log with example.

Finding_ID	Check_ID	Check Name	localid	Top pollute	Finding	Additional comment	Reference data label	Reference data	EU-Registry data label	EU-Registry	Response by country	Comment by country	EEA response/follow-up acti
C1.2a_EPRTR_2292	C1.2a_EPRTR	Polluters transition activity comparison (E-PRTR)	9008391215639	F	No	The activity of the E-PRTR facility does not correspond to the activity of the ProductionFacility in the EU-	MainAnnexIa(c)	5(a)	MainEPRTRa(3)	(c)			
C1.2a_EPRTR_5970	C1.2a_EPRTR	Polluters transition activity comparison (E-PRTR)	9008390397176	F	No	The activity of the E-PRTR facility does not correspond to the activity of the ProductionFacility in the EU-	MainAnnexIa(c)	3(c)	MainEPRTRa(5)	(b)			
C1.2a_EPRTR_2291	C1.2a_EPRTR	Polluters transition activity comparison (E-PRTR)	9008391215752	F	No	The activity of the E-PRTR facility does not correspond to the activity of the ProductionFacility in the EU-	MainAnnexIa(c)	5(c)	MainEPRTRa(5)	(b)			
C1.2a_EPRTR_5865	C1.2a_EPRTR	Polluters transition activity comparison (E-PRTR)	9008391597537	F	No	The activity of the E-PRTR facility does not correspond to the activity of the ProductionFacility in the EU-	MainAnnexIa(c)	5(c)	MainEPRTRa(3)	(c)			
C1.2a_EPRTR_5202	C1.2a_EPRTR	Polluters transition activity comparison (E-PRTR)	9008390484500	F	No	The activity of the E-PRTR facility does not correspond to the activity of the ProductionFacility in the EU-	MainAnnexIa(c)	4(a)	MainEPRTRa(8)	(b)			

It is anticipated that reporters’ responses in the Findings Log will be compiled into a master issue log and will undergo expert review, alongside the review of resubmitted data. As such, reporting countries are asked to provide an indication of where findings have been addressed by resubmissions. Issues that have a rational explanation for flagging but are likely to then be flagged year on year will be tracked in the issue log using an internal ID. This log will be referred to when reviewing the findings logs for following years before they are sent out to reporting countries. Issues that have been previously explained as reasonable will be filtered out where possible. This process is likely to be updated and refined as the reporting process develops.