



Brussels, 31 October 2007

**Subject: NFP meeting on the Shared Environmental Information System
19 November 2007, agenda item 2.1
legislative proposal to update standardised reporting directive
91/692**

The stated aim of the Standardised Reporting Directive 91/692 (SRD) was to rationalise and improve, on a sectoral basis, provisions concerning the transmission of information and publication of reports relating to a series of Community Directives on the protection of the environment

In particular, the SRD established three-year reporting cycles for legislation relating to air, water and waste respectively, together with a Committee procedure for establishing the questionnaires on the basis of which reports were to be produced.

It has long been recognised that the approach taken in the SRD is to a large extent outdated, specifically in three ways. Firstly, it is based on the concept of paper reporting, which is increasingly obsolete. Secondly, for many practical purposes a three-year period for reporting is too long, with the result that the data has ceased to be relevant by the time it is reported. Thirdly, the division of environmental legislation into three categories "air", "water" and "waste" does not properly reflect the breadth of current legislation or future priorities.

While some directives adopted since 1991 refer back to the SRD, particularly in areas such as waste (including waste incineration) and integrated pollution prevention and control (IPPC), the relative obsolescence of the SRD is also reflected in the extent to which many directives contain reporting requirements that do not follow the procedures outlined in the SRD.

In the context of developing a Shared Environmental Information System (SEIS) and modernisation of our current reporting systems, it is clear that the SRD needs to be updated. While this is only one pillar of the efforts that will be required to make SEIS a reality, updating the SRD would provide an opportunity to repeal any provisions that are clearly obsolete, and to include new provisions that will enable the current archaic paper reporting systems to be replaced by systems based on electronic exchange of information and distributed access.

A starting point for this update could be that, by the time that the new directive is transposed, there should be no need for any paper reporting.

Furthermore, provided that responsible authorities are clearly designated, and the rules concerning issues such as access rights clearly identified, all current reporting systems could be replaced by provisions ensuring that the required information is made available

in a format that can support the integrated assessments that we need to develop and implement sound policies. Rather than having fixed reporting intervals, the responsibility could be put on the designated authorities to ensure that the information (including both data and qualitative information such as assessments) is kept continuously up to date.

In this way, the updated directive would not—with the exception of repealing clearly obsolete provisions—alter the data and information requirements in current legislation as such, but would transform the way in which the information is made available.

Clearly these provisions would need to be worked out in more detail, along with their expected impact. DG Environment would nevertheless welcome first reactions on this type of approach, which takes into account the following considerations:

- (1) the current approach taken to reporting information is clearly outdated, does not take advantage of the rapidly evolving technical possibilities, and is not "fit for purpose" in meeting evolving political priorities and especially the need for more integrated assessments;
- (2) given the time-delay between the adoption of legislative proposals and their implementation in the Member States, it is essential to take a forward-looking approach from the outset;
- (3) the window of opportunity for adopting new legislative proposals under the present Commission will close in November 2008.