# Proposal for a simplified method for the

# quantification of emissions to water

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*Authors: Joost van den Roovaart (Deltares), Nanette van Duijnhoven (Deltares), Antje Ullrich (UBA)*

### List of abbreviations

AR Activity Rate

CIS Common Implementation Strategy

EC European Commission

EEA European Environmental Agency

EF Emission Factor

E-PRTR European Pollutant, Release and Transfer Regulation

ETC/ICM European Topic Centre for Inland, Coastal and Marine Waters

EU European Union

EQS Environmental Quality Standards

ICPR International Commission for the Protection of the Rhine

IWWTP Industrial Waste Water Treatment Plant

MS EU Member States

OECD Organisation for Economic Cooperation and Development

PAH Polycyclic Aromatic Hydrocarbons

p.e. population equivalent

PHS Priority Hazardous Substances

PS Priority Substances

RBD River Basin District

RBDSU River Basin District Sub-Unit

RBMP River Basin Management Plan

RBSP River Basin Specific Pollutant

TGD Technical Guidance Document

UWWTD Urban Waste Water Treatment Directive

UWWTP Urban Waste Water Treatment Plant

WFD Water Framework Directive

WG Working Group

WISE-SoE Water Information System Europe – State of the Environment

## Summary

Under the Water Framework Directive, Member States are required to report an inventory of emissions, discharges and losses of priority substances. Such information can give information on the success of measures to reduce emissions and indicate whether further efforts may be needed to deliver good chemical status. However, reporting of the inventory under the second river basin management plans was patchy and incomparable between Member States. While there is a Technical Guidance Document on the preparation of the inventory[[1]](#footnote-1), it appears that further information is needed to help Member States report in a consistent and comparable way. This paper aims to provide steps towards that, to enable improved quality of reporting in the third river basin management plans. A simplified method for the quantification of emissions to water is proposed, which will be used as a basis for discussion at the Water Framework Directive[[2]](#footnote-2) (WFD) Working Group Chemicals sub-group meeting on emissions, to be held in April 2020.

This activity is carried out by the European Topic Centre for Inland, Coastal and Marine Waters (ETC/ICM) for the European Environment Agency (EEA).

## Introduction

Several projects related to emissions to water, carried out in recent years for the European Commission[[3]](#footnote-3) (EC) and the EEA[[4]](#footnote-4),[[5]](#footnote-5),[[6]](#footnote-6),[[7]](#footnote-7), show serious problems regarding consistency, completeness and quality of the EU reported emission data. More specific, the EEA reports have shown:

* very little reporting on diffuse sources;
* limited (incomplete) reporting on urban wastewater treatment plant (UWWTP) effluents (not all UWWTPs, not all relevant pollutants);
* unclear quality of emission data of industrial sources (not all facilities, not all relevant pollutants);
* inconsistent reporting in time and space (no comparable and consistent time ranges and not all river basin districts reported);
* some double reporting or reporting gaps between the most important EU emission reporting requirements: WFD, E-PRTR[[8]](#footnote-8), Water Information System Europe – State of the Environment[[9]](#footnote-9) (WISE-SoE) and the Urban Waste Water Treatment Directive[[10]](#footnote-10) (UWWTD).

As a consequence of this, regarding the EU reported emission data (but not limited to the EU: these problems are recognized also on a global scale, see recent OECD[[11]](#footnote-11) and World Bank[[12]](#footnote-12) publications), there is:

* no EU wide overview of relevant emission sources/pollutants;
* no consistent time series, so no idea of trends;
* limited insight in the effects of emission reduction measures carried out in the past;
* no clear relation between emissions and water quality;
* no insight which future measures are needed to meet the water quality targets;
* extra effort for EEA and others in evaluation reports and comparison of different datasets.

### Aim of the work

The aim of the work is to support MS with the WFD reporting on emissions to water for the 3rd cycle of the River Basin Management Plans (RBMPs), to be published by the MS on December 22nd, 2021. Although a Technical Guidance Document was developed for the WFD inventory, reporting in 2016 showed only a few MS succeeded in reporting on diffuse sources and for more than a few pollutants – as summarized in the EEA chemicals report 18/2018. A conclusion might be that more support is needed to improve the emission reporting by the MS. This proposal is intended as supplementary advice, not to replace the existing TGD.

The idea behind the proposal is that available information, data and methods used for emission inventories by some MS or stakeholders can be used by MS with limited data or limited capacity to develop quantification methods. For MS already reporting diffuse emissions, it is intended that the project provides an opportunity to benchmark emission factors and quantification methods used with others. Use of (parts of) the proposed method or the data is intended to be optional.

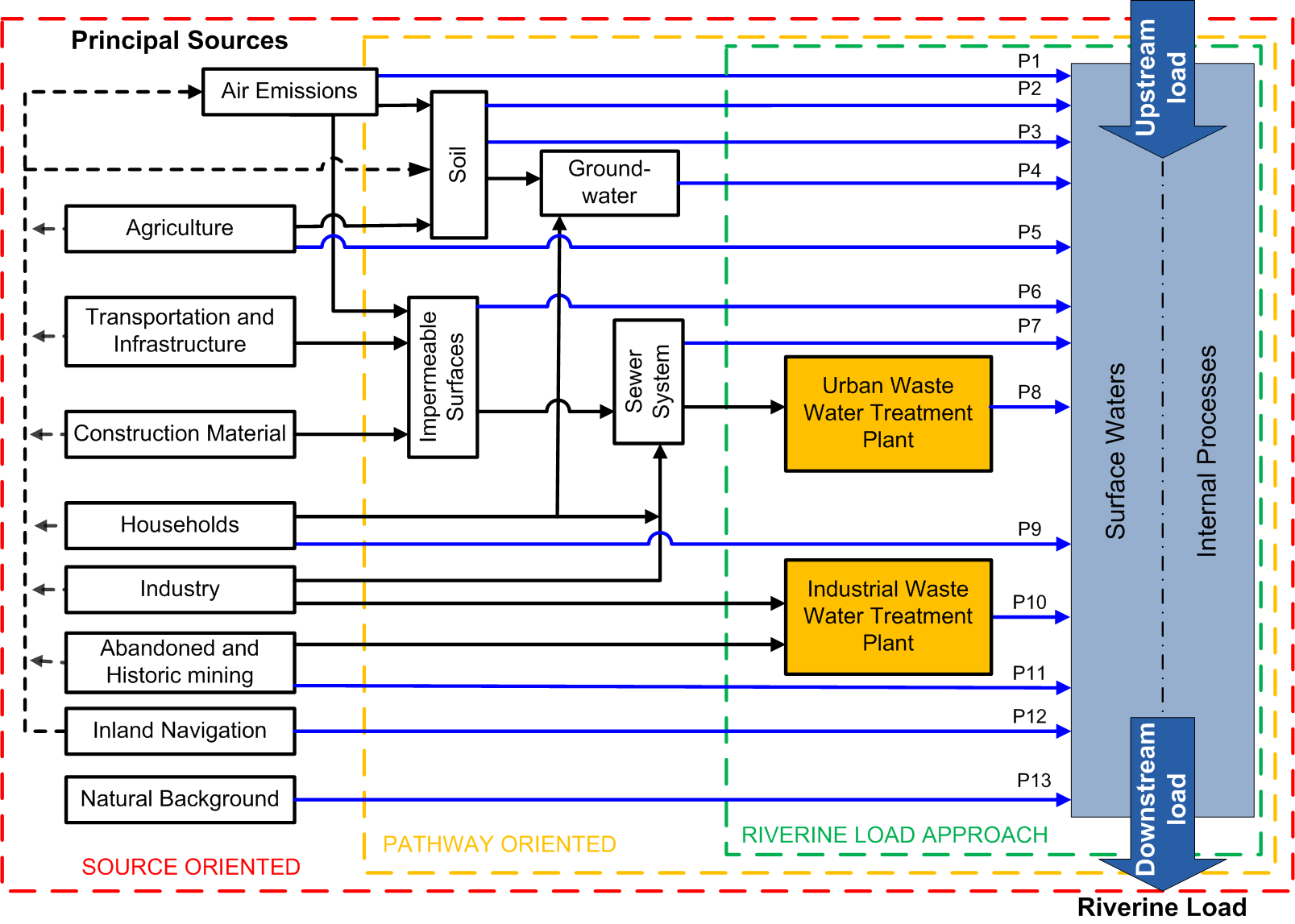
This proposal must be seen as an attempt to make a step forward in the quality i.e. completeness, consistency and transparency, of the WFD reporting of emissions to water. The proposal may also contribute to the harmonization of the methods used for the quantification of emissions to water and in that way improve the EU wide comparability of the reported emission data.

The proposed method has been deliberately designed to be as simple as possible. It is still an incomplete version: not all the details have been fully worked out. A number of discussion points (to add more details to the method, to set other priorities, etc.) is included. It is not intended that simple methods override more detailed approaches already being used by MS: rather, the proposal is targeted towards those MS which currently lack data and or methods.

## Simplified method for the quantification of emissions to water

### General scheme

A general scheme in which the main principal sources, pathways and intermediates of emissions to water are represented was developed under the WFD Common Implementation Strategy[[13]](#footnote-13) (see Figure 1 below).

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| --- | --- |
| P1 Atmospheric Deposition directly to surface water | P8 Urban Waste Water treated |
| P2 Erosion | P9 Individual - treated and untreated- household discharges |
| P3 Surface runoff from unsealed areas | P10 Industrial Waste Water treated |
| P4 Interflow, Tile Drainage and Groundwater | P11 Direct Discharges from Mining |
| P5 Direct discharges and drifting | P12 Direct Discharges from Navigation |
| P6 Surface Runoff from sealed Areas | P13 Natural Background |
| P7 Storm Water Outlets and Combined Sewer overflows + unconnected sewers | |

#### *Figure 1 Relationship between the different surface water compartments and pathways (P1-P13) (EC, 2012)*

On the left in the scheme, the principal sources of the pollutants are shown, representing groups of sources which can be related to economic sectors or activities. The natural background is also represented as a source. Emissions, discharges or loads can follow different pathways, either directly to surface water, or to other compartments of the environment (air, soil, groundwater). A specific place is given to urban areas with the impermeable surfaces, the sewer system and the waste water treatment plants, both urban (UWWTPs) and industrial (IWWTPs).

Although different approaches are shown in the scheme (riverine load approach, source oriented approach and pathway oriented approach), the quantification of the different pathways (P1-P13) can be seen as the core of a complete emission inventory. Most of the existing emission reporting requirements can be related to one or more of these defined pathways. Therefore, this proposal will focus on the quantification of the pathways P1-P13.

**Discussion point 1**: Although the riverine load approach is more simple than the pathway approach (and is, of course, better than no inventory at all), it is not chosen as preferred method in this proposal, mainly because it doesn’t give insight in the different sources behind the pathways. As a result, it would not be easy to make a connection with possible mitigation measures.

AT: The riverine load approach should be kept as simplified assessment method for cases a source or pathway oriented approach is not applicable. Independently from the emissions assessment approach a harmonized methodology for the calculation of river loads is needed, mainly with regard to conventions how to consider values <LOQ and non detects. The criteria in directive 2009/90/EC are not applicable. Usually concentrations in wastewater are higher than those in surface waters. This fact could lead to the calculation of negative diffuse emissions and indicate one major emission pathway, which might strongly be biased by calculation rules. The calculation of river loads is also essential for quality assurance, as it represents the only evaluation criteria for the emission calculation.

**Discussion point 2**: It is interesting to have information on the primary sources (use of products, processes) within households and small and medium enterprises (SME’s) which end up in the sewer and the UWWTP’s, but this rather complicated exercise is something likely to be more appropriate in more advanced stages of emission inventories.

AT: Information on primary sources are interesting and relevant but actually not regarded as of priority relevance. Furthermore the consideration of households and SME would result in emission information to sewage systems which than would have to be combined with removal efficiencies of UWWTPs. For discharges from UWWTPs for most compounds measured data is already available, which is not the case for most diffuse emissions.

### Simplified emission factor method

It is proposed to use a simplified emission factor method as developed in the International Commission for the Protection of the Rhine (ICPR), using a limited number of emission factors and statistical data. This method has been described, including the data used, in Water, Science and Technology, 2001[[14]](#footnote-14). The method has been applied for 7 heavy metals for the Rhine catchment. The estimated loads sufﬁciently agreed with the loads of the river Rhine, as measured at the Dutch-German border.

This emission factor method has also been the basis for the EC project: *Diffuse water emissions in E-PRTR*[[15]](#footnote-15). In this project diffuse emissions to water have been quantified for a selection of 40 key sources – key substance combinations, covering the EU Member States and the EFTA countries on a River Basin District sub-unit scale. The report and maps are available on the E-PRTR website[[16]](#footnote-16). A good explanation of emission factors used in emission inventories can be found in a publication of TNO: *The Art of Emission Inventorying*[[17]](#footnote-17). Although this publication is related to air emission, a lot of the problems and solutions are also recognized in emissions to water inventories.

Emissions of a pollutant for an activity are calculated by multiplying an activity rate (ARa) for a specific activity (or pathway) by an emission factor for this activity and a certain pollutant (EFp,a), expressed in emission per AR unit. An example for an activity is the production of urban waste water. The AR will then be the number of inhabitants producing waste water. The EF for a pollutant, e.g. total-Nitrogen, will then be the yearly load total-Nitrogen in urban waste water per inhabitant.

The calculation method is shown in the formula below:

*Ep,a* = *ARa x EFp,a*

Where:

*Ep,a = Emission of a pollutant for an activity*

*ARa = Activity Rate for an activity*

*EFp,a = Emission factor of a pollutant for an activity*

The emission calculated in in this way is referred to as the total emission. For an activity where all emissions are released directly into surface waters (e.g. P12 Inland Navigation), the total emission equals the net emission to surface waters. When only a part of the calculated emissions ends up in the surface water, and the other part for example in soil, an extra factor needs to be introduced which describes the percentage of the emissions to surface water.

Not all the pathways can be covered with the simplified emission factor method. Some pathways are too complex to be described with only an AR and an EF. For those pathways (e.g. P1 and P3) models are often used. Some models used by MS for the quantification of emissions to water are: MONERIS[[18]](#footnote-18), MoRE[[19]](#footnote-19), WEISS[[20]](#footnote-20) and Pegase[[21]](#footnote-21). Different models may use different definitions of pathways, combine pathways or split up pathways in relevant sub pathways. All these models make use in a way of emission factors. When EU-wide models are known for specific pathways and quantified emissions are available, these models are mentioned in this paper.

### Activity Rates (AR)

It is proposed for the AR’s to make use of freely-available statistical data, which are updated on a regular basis (e.g. the Eurostat Database[[22]](#footnote-22)). This will facilitate the regular updating of the emission inventory and limit the overall burden of emissions reporting. Examples of an activity rate are: inhabitant, population equivalent (p.e.), amount of km driven by cars. In an ideal situation, the chosen AR is as close to the real polluting activity or process as possible (e.g. km driven by cars).

In some cases appropriate data for the ideal AR are not available. In other cases, the available data sets might contain gaps for specific areas or time periods. In such cases application of a so-called proxy variable can help to derive at least a rough estimate of the AR. A proxy variable is a variable that is not directly related to the data that are needed but might have a good correlation with such data. Such proxy data could be the population size or gross domestic product or other high-level indicators of the size and the economic activities in a country. When using a proxy, one has to assume or derive a relationship between the value of the data searched for and the value of the proxy in countries or years where data are available. The estimates for the gaps then follow from the application of this relationship (adapted text from TNO publication: *The Art of Emission Inventorying*).

### Emission Factors (EF)

Emission factors are related to a specific AR (and pathway) and are pollutant-specific.

An EF may vary in time and space, mainly as a result of:

* implementation of new technologies;
* implementation of mitigation measures (like banning or limiting specific products or uses);
* national or regional differences in the use of products or appliance of processes.

One of the big challenges for a simple emission inventory is to find an optimum between using general EFs whenever possible but differentiate if necessary.

### Spatial scale

The easiest way of using the simplified emission factor method is to apply it on a country level. This would already be a good start for the emission inventory. A lot of statistical data is available at a country level. At the other hand, in the TGD is described that certain pollutants do not need to be quantified and reported for the RBDs where no exceedance of the EQS is seen.

**Discussion point 3**: Would it be acceptable to focus as a first attempt the emission quantification on the country level and (for the moment) not detail the calculations to the level of River Basin District (RBD), or even River Basin District Sub-Unit (RBDSU)?

AT: Not relevant for the calculation of emissions. Depends on the level of aggregation of the available input data (national, regional, river basin level, …).

### Temporal scale

Most emission inventories aim to estimate the total mass of one or more emitted pollutants within one specified year. Therefor the quantified emissions will be expressed in mass units per year, corresponding to a specific year (not to be confused with the year in which the inventory is compiled and reported).

### Pollutants

The WFD inventory applies to a long list of priority substances and other pollutants (EQS Directive[[23]](#footnote-23), 2008 Article 5), which means that the inventory will have to address all inputs of those substances into the environment, irrespective of the compartment or pathway involved, that are likely to reach surface waters. Though, as a first step within this proposal, it might be necessary to prioritise the work on a smaller group of priority substances.

A recent overview of reported emission data by EEA[[24]](#footnote-24) (see Table 1 next page) shows the 17 pollutants most frequently causing failure to achieve good chemical status for the WFD. This Table also shows the limited number of MS reporting diffuse sources, with only about one third of MS reporting diffuse sources of metals. For other pollutants, even fewer MS manage to report.

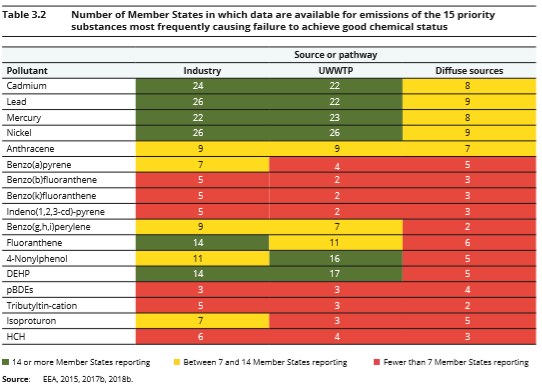


Table 1 From: EEA Report No 18/2018 Chemicals in European Waters: [https://www.eea.europa.eu/publications/chemicals-in-european-waters](https://www.eea.europa.eu/publications/chemicals-in-european-waters%20)

**Discussion point 4**: It will not be possible to achieve a complete overview of all relevant pollutants within this project. If we start trying to complete inventories for pollutants about which we should know a lot, learning from that process can be applied to those pollutants where emissions are less clear. Besides, it can be more encouraging to show a limited number of pollutants for which the inventory of all the (relevant) pathways is more or less complete, than a larger list of pollutants with a lot of missing pathways. We propose to focus on a subset of substances most frequently exceeding the EQS targets, supplemented with the most important (and well reported) ecological parameters total Nitrogen and total Phosphorus. This results in a preliminary list of 11 pollutants (see Table 2).

AT: Benzo(g,h,i)perylene and Anthracene are suggested to be removed from the list. Working on the Austrian emissions inventory it was challenging generating a database on the occurrence of these compounds in various emission pathways. Furthermore no AA-EQS is available for Benzo(g,h,i)perylene since 2013 and no exceedances of the MAC-EQS are observed in AT. Fluoranthene and Benzo(a)pyrene are regarded as important representatives of the group of PAH and should be kept in the list.

For DEHP the available monitoring database will have to be assessed with care as due to the ubiquitous occurrence measurements frequently are biased. Would PFOS be an interesting compound?

|  |
| --- |
| **Pollutant** |
| total - Nitrogen |
| total - Phosphorus |
| Cadmium |
| Lead |
| Mercury |
| Nickel |
| Anthracene |
| Benzo(a)pyrene |
| Benzo(g,h,i)perylene |
| Fluoranthene |
| DEHP |

Table 2 Proposed selection of pollutants

### Overview per pathway

In this paragraph, the 13 pathways and the accompanying activity rates and emission factors will be discussed briefly. A general remark is, there seems to be no clear definition of the different pathways in the TGD.

**Discussion point 5**: Would it be helpful to add a clear definition of the pathways in this proposal?

AT: Definitions always are useful.

Table 3 (added as a separate spreadsheet) gives an overview of the relevant details and background information of the proposed methods for the different pathways. In the tab “*Formula*” the formulas for the calculation of the emissions are given, definitions of the ARs, the EFs and other factors used and the references to the data. In the tab “*EF*” the EFs are given per pathway for the selection of pollutants (as far as available).

For the selected pollutants, not all pathways seem to be relevant. For those pathways (P5 and P12) no quantification of emissions has been worked out in this proposal. For the other pathways not all the selected pollutants seem to be relevant. For those pathways a proposal is given, which pollutants are relevant and thus needed to be quantified. In Table 3, tab “*EF*” those pollutants are indicated with a green color. Pollutants proposed as not relevant are indicated with blue-grey color. When it is not quite clear in which of these two categories a pollutant fits, a yellow color is given.

**Discussion point 6**: Do MS and stakeholders agree with the deselection of P5 and P12 and for the current work to focus on the selected substances indicated relevant for the individual pathways in Table 3, tab “EF”?

AT agrees to the deselection of P5 (direct discharges and drifting) and P12 (direct discharges from navigation).

### P1 Atmospheric Deposition directly to surface water

Atmospheric deposition can be described as the load of substances to surface water or soil via the atmosphere. Once emissions to air from sources (e.g. traffic, shipping, industries) have entered the atmosphere, the substances are distributed through the atmosphere and end up in the water and on the soil as a result of deposition in wet (precipitation) and dry form.

For the calculation of emissions EMEP modelling results can be used. For Total – Nitrogen, cadmium, lead, mercury and benzo(a)pyrene modelled fluxes are available for Europe on a 50x50 km level. The average calculated flux (mg/ha/year) per MS can be multiplied with the total area of inland surface water per MS.

For the other PAHs, no EMEP modelling results are available. Instead of these results, the ratio between BaP and the other PAH can be derived from the dry deposition measurements per country. The ratiofactor BaP/PAH could be used for the quantification of the deposition of the other PAHs. For all other substances, it might be checked if deposition measurements have been made by MS. If a flux (mg/ha) is available, it could be multiplied with the area of inland surface water.

**Discussion point 7**: Do MS have recent data on deposition monitoring that could be shared?

AT: Yes, data is available and references have already be shared by mail (22.4.2020)

### P2 Erosion

Erosion causes a load to water, due to erosion of substances from the rocks in the subsoil or from (heavy) rainfall or wind which removes soil, rock or dissolved material and transports to the surface water.

The load of pollutants to surface water as a result of erosion might be calculated by multiplying the substance content of fine soil by the soil erosion (Eurostat) in tonnes/hectare.

**Discussion point 8**: Is more recent data available for the substance content of fine soil by the soil erosion than used in Table 3 and are there ideas about other quantification methods?

AT: Data on soil and suspended solids are available and references have already be shared by mail (22.4.2020). Fine soil should be specified.

P3 Surface runoff from unsealed areas

The nutrient emissions are calculated by the JRC’s GREEN model. The GREEN (Geospatial Regression Equation for European Nutrient losses) is based on a simplified conceptual approach distinguishing the different pathways in which nutrients reach surface waters. For the surface runoff from unsealed areas diffuse sources, including fertiliser applications (both mineral and organic forms), scattered dwelling and atmospheric deposition could be considered.

For other substances no model is available. It mainly consists of surface runoff from agricultural and natural soils. In Mohaupt et al (2001) a simplified method is described to calculate the surface runoff. For the calculation, the mass of organic and mineral fertilizers (t/year) per country should be identified. The used mass per MS can be multiplied with the metal content of fertilizers (mg/kg). Factors as seepage, spray drift and runoff play a key role in the diffuse emissions to water.

**Discussion point 9**: Are there more recent data for the metal content of fertilisers? Would it be possible to use common factors for seepage, spray drift and runoff?

AT: In a recent study on emission modelling (link already submitted at 22.04.2020) data on metal content of fertilizers were estimated on base of data from recent literature.

Using common factors at least for seepage seems to be unreasonable, because they very much depend on soil physics, soil chemistry and (soil) hydrology (extreme uncertain). For spray drift (no data were used in emission modelling in Austria up to now and it is unclear if data are available) for surface runoff loads were calculated on base of a water balance and mean runoff concentrations. The use of common factors without considering at least the surface water runoff seems to be very uncertain.

P4 Interflow, Tile Drainage and Groundwater

This pathway is about the leaching of substances from unsealed areas, whereas pathway P3 describes the runoff of the unsealed areas.

For the nutrients this pathway is covered in the JRC Green model. For the metals a method is described for the drainage in Mohaupt, 2001. The discharge of drained area per MS will be multiplied with the concentration in drainage water. Information about drained areas is available at Eurostat.

P5 Direct discharges and drifting

This pathway is especially important for pesticides. Since that group of pollutants is not enclosed in our selection, no quantification method is described in this proposal.

P6 Surface Runoff from sealed Areas

This pathway describes the loads that end up in the surface water through surface runoff from sealed areas.  The part of the loads that goes to the sewer system (mainly in urban areas) is covered by the pathways P7 and P8. It is not easy to distinguish between these pathways and for now, there is no methodology available to quantify this pathway.

**Discussion point 10**: Is this a pathway with significant contribution to surface water? Do MS use this pathway in their models?

AT: emissions from surface runoff from sealed areas as e.g. from highways/ roads in rural areas are considered and contribute emissions of metals and PAH. Compared to emissions via erosion the relative contribution is notably lower but depends on the investigated sub-catchment land use characteristics.

P7 Storm Water Outlets and Combined Sewer overflows + unconnected sewers

Storm water outlets

In this pathway, rainwater will be collected separately. To calculate loads for the storm water outlets information per MS is necessary about the paved urban area, precipitation per year, the percentage of the separate sewer systems and the percentage specific runoff. These factors will be multiplied with the measured concentration in storm sewer outflows.

Combined sewer overflows

If the sewer system can’t handle the large amount of precipitation, the combined sewers may overflow.

Unconnected sewers

Waste water in a collecting system is not connected to any treatment plant. The waste water will be discharged without treatment. Loads to surface water can be calculated by using the load entering an UWWTP for not connected UWWTPs in the Waterstat – UWWTD database. The total load per MS will be calculated with measured concentration in sewer and treatment plants overflows.

P8 Urban Waste Water treated

For UWWTPs with a capacity above 100,000 p.e. this pathway should be covered under E-PRTR reported loads.

**Discussion point 11**: EEA is considering supporting the coming WFD reporting by providing E-PRTR data at RBD level already reported by MS (see also P10). Would that be helpful to the MS?

AT: The Austrian emission register includes detailed data, but yes, a summary of E-PRTR data provided by EEA would be helpful.

However, evidence [[25]](#footnote-25),[[26]](#footnote-26) shows that many pollutants are not reported by certain countries or not reported for specific facilities, although releases above the pollutant thresholds would be expected, owing to the size of the UWWTP. In these situations, emission factors (based on reported E-PRTR data) can be used to quantify pollutant releases from UWWTPs not reported under E-PRTR but above the capacity threshold of 100,000 p.e and above the E-PRTR pollutant threshold.

Besides, a recent study[[27]](#footnote-27) shows that the total sum of all UWWTPs below the E-PRTR reporting threshold may contribute in a significant way to the total loads from all UWWTPs. Also, these loads of pollutants from UWWTPs below the capacity threshold of 100,000 p.e. can be quantified using the same EFs as mentioned above.

**Discussion point 12**: The emission factors[[28]](#footnote-28) used in Table 3 can be compared with information from recent UBA publication on UWWTP monitoring. Also, other MS might have useful recent data on this subject.

AT: Yes, data is available and references have already be shared by mail (22.4.2020)

P9 Individual - treated and untreated- household discharges

This source contains the discharges of domestic wastewater, not connect to a sewer system. The wastewater loads will reach the surface water directly, will infiltrate in the soil or will be collected and treated in e.g. septic tanks.

For the untreated households, the number of ‘untreated’ inhabitants per MS is multiplied with the emission per inhabitant per year. For the treated households the number of ‘treated’ inhabitants is used with a removal efficiency for the septic tank in which the wastewater is collected. The last step is to estimate the load to surface water and to soil, no figures seems to be available. The ratio of surface water to soil may be used in a MS instead.

P10 Industrial Waste Water treated

This pathway is already covered by the E-PRTR reported loads. In theory, all emissions to water are reported on a yearly basis by the MS under 3 conditions:

* they fall under the activities selected for reporting in the E-PRTR;
* they are released from activities with capacities above the capacity thresholds mentioned in the E-PRTR and
* the loads are above the pollutant thresholds mentioned in the E-PRTR.

**Discussion point 13**: EEA is considering supporting the coming WFD reporting by providing E-PRTR data at RBD level already reported by MS (see also P8). Would that be helpful to the MS?

AT: The Austrian emission register includes detailed data, but yes, a summary of E-PRTR data provided by EEA would be helpful.

It is very difficult to check if the reported loads are complete. There are indications some pollutants might be under-reported by certain sectors. A comparison has been made between the expected pollutants per activity in the E-PRTR Guidance document and eleven most reported pollutants[[29]](#footnote-29). It shows a number of activity-pollutant combinations for which no loads are reported but might be expected to be reported according the Guidance document. E.g. the PAHs are reported only to a very limited extent, which could be a signal of underreporting. The use of emission factors to quantify these releases instead of, or in combination with, regular monitoring could be considered.

**Discussion point 14**: Would it be useful to carry out an analysis, together with the sector on a selected number of industrial activities for which facilities and/or pollutants seem to be missing? A recent EEA publication on industrial waste water[[30]](#footnote-30) and stakeholder data might be useful in such an action.

AT: Yes would be helpful. Whereas UWWTP are well investigated also considering micropollutants only few information is available on discharges from industrial facilities from different industrial activities.

P11 Direct Discharges from Mining

Only historical mining sites are part of this pathway. Operational mining sites have to be reported under E-PRTR (P10). At the moment it is not clear yet how to quantify emission from abandoned mining sites.

**Discussion point** **15**: Would it be useful to carry out a literature or stakeholder check for emission data from mining sites. Do MS or stakeholders have data on this pathway or ideas for quantification methods?

AT: mining sites, especially historical mining might be relevant sources for metals. Therefore, a literature or stakeholder check could provide helpful information. However, it is difficult to quantify and to assign the emissions from mining sites to specific surface water bodies/sections. Guidance on these issues would be helpful.

P12 Direct Discharges from Navigation

In the general scheme (see Figure 1), only inland navigation is mentioned as primary source. Also, sea shipping should be included here, since this will be an important activity in specific WFD transitional and coastal waterbodies. Navigation might be a relevant source for PAHs.

**Discussion point 16:** Do we have to include inland navigation for PAH emissions and is there any data available?

AT: pathway might be of relevance for the Danube, but no data/methodology for quantification are available.

P13 Natural Background

This will be a relevant pathway, at least in some areas, for metals, total Nitrogen and total Phosphorus. In Mohaupt et al (2001) the loads from natural background are calculated as the difference of the loads in the river discharge of a RBD and the known anthropogenic loads (sum of industrial and communal discharges, drainwater and stormwater overflows).

**Discussion point 17**: Do MS or stakeholders have suggestions for an improved method for quantification?

AT: The CIS guidance on bioavailability of metals includes a description of methods to derive natural background concentrations.

## Follow-up

This draft paper will be input for the workshop coming April. At the workshop it will be discussed how to proceed with the paper and other possible follow-up activities.

1. *CIS WFD Guidance document No. 28 Preparation of Priority Substances Emission Inventory, EC 2012: <https://circabc.europa.eu/sd/a/6a3fb5a0-4dec-4fde-a69d-ac93dfbbadd/Guidance%20document%20n28.pdf>* [↑](#footnote-ref-1)
2. *Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, OJ, No. L 327, p. 1 ff.* [↑](#footnote-ref-2)
3. *Roovaart, J., et al., 2013a/b, Diffuse water emissions in E-PRTR, Report No 1205118-000-ZWS0016/18, Deltares, Netherlands* <https://circabc.europa.eu/sd/a/dd20cdae-c76a-49b1-bf75-675c15a454d4/Diffuse%20water%20emissions%20in%20E-PRTR%202013%20background%20document.pdf> [↑](#footnote-ref-3)
4. *Roovaart, J. van den et al., 2016, E-PRTR completeness checks – water, ETC/ICM Technical Paper, version November 2016.*  [↑](#footnote-ref-4)
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