**DK responses to discussion points raised in the Proposal for a simplified method for the**

**quantification of emissions to water**

**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.

DK response: Agree to proceed with pathway approach.

**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.

DK response: We can accept this.

**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)?

DK response: We do not have a strong opinion on this but agree that the proposed approach will simplify the emission quantifications and, hence, increasing the likelihood of obtaining qualified data.

**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).

DK response: It would be much appreciated if pollutants such as pesticides and/or pharmaceuticals could be represented in this exercise to shed light on the challenges connected to the pathways etc. relevant for these substances.

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

DK response: A clear definition of the individual pathways would be helpful considering the possibility of using appropriate data in the correct manner and enhancing the possibility of comparing results among MS.

**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”?

DK response: As stated in discussion point 4, we would appreciate the inclusion of pesticides if possible.

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

DK response: Updated deposition and emissiondata can be found here: <https://webdab01.umweltbundesamt.at/official_country_trend.html?cgiproxy_skip=1>

**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?

DK response: N/A

**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?

DK response: Considering that the EU MS is separated into zones in regard to environmental conditions for risk assessments of pesticides, it is not considered acceptable to apply common factors for seepage, spray drift and run-off. It is proposed to apply same conditions for the individual zones as under the Regulation for plant protection products.

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

DK response: We are currently awaiting the final version of a national funded report on diffuse sources of a number of substances. The report has attempted to quantify emissions through this pathway. Furthermore, this pathway is used for modelling the emission of biocides used in e.g. building materials. However, it is not a part of the River Basin Management plans.

**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?

DK response: yes

**Discussion point 12**: The emission factors[[1]](#footnote-1) 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.

DK response: Corresponding to our answer concerning discussion point 9, it would be helpful if for each emission factor it could be specified whether it is expected to be applicable across the EU or if emissions factors are expected to differ between MS’s or between different zones in the EU.

**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?

DK response: N/A

**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 and stakeholder data might be useful in such an action.

DK response: N/A

**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?

DK response: N/A

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

DK response: We find that inland navigation for PAH emissions should be included if data are available.

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

DK response: We are currently awaiting the final version of a national funded report on natural background concentrations, which may be of interest on this question.

1. *Roovaart, J and N. van Duijnhoven. 2018, Development of quality checks for E-PRTR data on releases to water* [↑](#footnote-ref-1)