

## Specific problems with the reporting for the 2<sup>nd</sup> RBMP?

Tier	Sources	Register 2016	Comments
1	Point sources	Yes	All sewage treatment plants and industrial plants in Sweden that are subject to permits and reporting requirements in accordance with the E-PRTR Directive  Not all relevant parameters
1	Emissions to water	Yes	Supply to the larger Swedish coastal estuaries (the river outlet monitoring program, 85–90 per cent of the draining water from Sweden)

Reporting at minimum level

### Missing data;

- for estimating diffuse emissions. Emissions are only reported to data host to a limited extent due to threshold levels and absence of relevant substances in the reporting requirements in accordance with the E-PRTR Directive
- for estimating emission from contaminated areas due to absence of reporting requirements to data host of Status reports (IED-directive)
- on production and chemical use
- from other distribution routes

### Harmonization between directives (WFD, E-PRTR, IED, WWTD)

- Threshold levels and substances need to be harmonized between directives in accordance to WFD
- All priority substance from minor but relevant emission sources and status reports (IED) need to be included into the reporting requirements to be able to assess cumulative impact of WFD substances.

# What are your plans and needs for reporting of emission for the 3<sup>rd</sup> WFD RBMP?

First of all - We need to solve the problem with threshold levels and absence of relevant substances in the reporting requirements to national data host to be able to include emissions from diffuse sources

Emissions from;

- sources whose capacity is below the specified capacity thresholds
- sources or activities that are not subject to reporting requirements
- other pathways (contaminated land, landfills etc)



# Do you have specific information or data you want to share to the group or items to discuss?

Should all MS use the same emission factors?

We believe that the uncertainties (data and assumptions) of EF will have a large impact on the calculated emissions. This will make it difficult to compare emissions between MS and between cycles.

If the same EF is used (in different MS and over time), differences/improvements will be based solely on reduced AR. It will be hard to see differences in improvements within and between different countries with the proposed method.

Proposed substances in the method are too limited and it should include more substances and pathways. There is a need for a strategy how to include all relevant substances over time.

