

21 October 2020, Brussels

## **FEAD feedback to the EC Roadmap on the Industrial pollution – European Pollutant Release and Transfer Register (updated rules)**

**FEAD**, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the revision of the Industrial pollution – European Pollutant Release and Transfer Register as an initiative part of the European Green Deal, the new Circular Economy Action Plan and the recently published Commission Staff Working Document Evaluation of the Industrial Emissions Directive.

In general, the overall structure of the E-PRTR appears to function well. However, FEAD would like to provide the following comments related to the aspects identified as in need to be supported by policy options:

- 1 **Aspect 2 - Inclusion of additional sectors:** there are some important sectors currently not very strongly regulated. Certainly, there is room for improvement. However, it will be a challenge to tackle the majority of the diffuse emissions from these sectors and bring them in a balanced way with the channelled emissions from most industries.
- 2 **Aspect 3 - Inclusion of additional pollutants:** of course additional pollutants can be taken into account but only if the assessment shows evidence that these pollutants are really relevant (avoid “nice to have” substances), otherwise they will be contrary to the aim for increased efficiency and timeliness under Aspect 5

**FEAD** is committed to the objectives of the European Green Deal and considers the above-mentioned measures apt for providing the adequate stimuli both for addressing GHG emissions and enhancing of the circular economy in Europe.