**Input for the preparation of thematic report on strengthening access to information on the environmental and health hazards posed by hazardous substances through establishing, enhancing and integrating Pollution Information Portals**

Between May 20, 2021 and May 19, 2024, the project “Enhancement of Pollutant Release and Transfer Registers (PRTRs) in the Western Balkan countries and the Republic of Moldova”, funded by the Federal German Ministry of Environment, Nature Conservation, Nuclear Security and Consumer Protection, within the Assistance Programme for Environmental Protection in the Countries of Central and Eastern Europe, the Caucasus and Central Asia and other countries bordering the European Union, and supervised by the German Environment Agency, has been carried out. The project has been implemented by Participatio Ltd. (a consultancy company from Hungary) and four NGOs as partners, Resource Environmental Center (REC) Albania, REC Bosnia and Herzegovina, REC Montenegro and EcoContact (Moldova). The implementers also contributed with co-funding for the project.

We summarize below the goals, activities and achievements of the project, as well as some of the main challenges and lessons learnt.

The project involves three Parties to UNECE PRTR Protocol (Albania, Montenegro and the Republic of Moldova), a signatory country, Bosnia and Herzegovina, and Kosovo\*. The project beneficiaries are the authorities responsible for PRTR (in the agencies and ministries).

The project also contributes to the implementation of the Work Programme of the UNECE Protocol on PRTRs, and its Strategic Plan.

*The goals of the project are:*

* To support Western Balkan countries and Republic of Moldova in developing or upgrading their PRTRs;
* To enable relevant authorities, operators and Civil Society Organizations (CSOs) for the implementation of the UNECE PRTR Protocol and the E-PRTR&LCP integrated reporting, reporting to the EU Registry and the Industrial Emissions Directve (IED); and
* To achieve more informed decision-making for sustainability.

*The project has contributed to the development of PRTRs in Bosnia and Herzegovina, Kosovo\* and Montenegro by the following:*

Assessments of the legal, institutional, technical and capacity building frameworks were prepared in the three countires and proposals were developed for the necessary changes in legislation, institutional set up, technical and capacity building conditions to establish PRTRs and meet the needs of the UNECE Protocol on PRTRs and EU’s E-PRTR&LCP integrated reporting.

Stakeholder dialogues were held on the assessments and proposals for PRTR with the involvement of the relevant authorities, operators and CSOs;

Legislative developments carried out during the project: Rulebooks (decrees) were developed on PRTR in Bosnia and Herzegovina in the two entities and Brcko District level, in a harmonized way. Legislative amendments were proposed in Montenegro and Kosovo\*. These latter are currently still under way.

Capacity building was offered in form of a series of one-day trainings to enable the authorities, operators to carry out their role, and for CSOs to understand what PRTR is, and how PRTR data can be used in their actions. Two-day workshops were held on the EU’s E-PRTR &LCP integrated reporting and the Industrial Emissions Directive.

Common technical solution was proposed to develop and install a common PRTR software in the 3 project countries (Bosnia and Herzegovina on 4 levels, and in Kosovo\*and Montenegro), consisting of an online reporting tool, database and webplatform. The installation of the software is in the final phase. Online trainings and consultations are held for the relevant PRTR staff at the ministries and/or agencies after the installation and testing of the PRTR software to prepare them for the use of the software. A step-by-step guide will also be provided for the relevant authorities and for the operators on how to use the online reporting system.

*Assistance has been provided to upgrade and operate more efficiently PRTRs in the Republic of Moldova and in Albania:*

In the Republic of Moldova an appraisal of the current PRTR (developed in a former project implemented by UNITAR) was made and the proposals for improvements were discussed in a stakeholder event, with the authorities responsible for PRTR and with the representatives of operators and CSOs. Short term interventions in the fuctioning of the PRTR software and webplatform were carried out to improve the operation of the register and to enable online reporting by operators. As a result, for the first time, online reporting was made possible for operators from March 2024. More funding is needed for the implementation of further, more extensive improvements.

Capacity building was enabling the staff of the Agency for Environmental Protection, operators and CSOs on the operation of PRTR in one day trainings, and in a two-day workshop on the requirements of the EU’s E-PRTR &LCP integrated reporting and the Industrial Emissions Directive, as well as the UNECE Protocol on PRTRs.

In Albania, the E-PRTR is still operational but as it was developed and installed in 2013, and due to security problems, a new system is planned to be developed together with the new integrated information system of the National Environment Agency. Therefore the activities in the project have been focused on capacity building in form of one-day trainings for operators and CSOs on the operation of PRTR, and a two-day workshop on the requirements of the EU’s E-PRTR &LCP integrated reporting and the Industrial Emissions Directive, as well as the UNECE Protocol on PRTRs. An EU guidance document and the UNECE Protocol on PRTRs were translated to local language and a brochure is developed to assist the civil society to understand PRTR and the use of PRTR data and information.

*Some of the main challenges experienced during the project:*

* Lack of human capacities was observed in the authorities responsible for PRTR, including the limited number or no IT staff.
* Financing difficulties - no regular budget has been allocated for PRTR management and operation, for human and technical resources, and there has been a tendency of relying on projects for PRTR development. As a result, between projects, it often happened that there was no progress in the establishment or operation of PRTR.
* In several countries it has been a problem that many of the operators do not report, as their permit and PRTR status has been based on their full capacity. However, when they do not operate with full capacity, they are not obliged to report to the PRTR. The thresholds of reporting are based on the large-scale facilities.
* The issue of ownership of PRTR software, the use and the further maintenance posed problems when the PRTR software was developed by (foreign) companies which kept the property rights and when it was needed, did not want to provide services free of charge.
* The lack of integration of PRTR with other databases has not been made possible, and has not been planned for, therefore the full PRTR information may be more difficult to access, as may be allocated in different databases.
* The PRTR data currently is used for decison-making only in a limited way, and the potential of PRTRs is far from being (fully) exploited, including the reporting on various MEAs, SDGs, or to promote decision-making on sustainability.
* The political changes and administrative difficulties could influence the pace of implementation, and therefore, the length of the project/s could be prolonged or could be unpredictable (e.g. elections, complex poltical institutional structures and situation, administrative measures, etc.);
* It has been difficult to cope with the requirements of the EU’s E-PRTR system, the compliance with these requirements is a moving target. While the countries in accession with the EU are aiming at implementing the EU requirements, the EU is progressing further. (Currently the amendment of the E-PRTR Regulation and the Industrial Emissions Directive is in process. The E-PRTR Regulation will be called Industrial Emissions Portal Regulation.)

*Some lessons learnt during the project:*

* Strategy agreed for a longer term and a workplan gives the direction for the development of PRTR, but the PRTRs should be built gradually, implemented step by step, learning by doing. It is also possible to start with steps on a voluntary basis (e.g. operators could report voluntarily and test the online reporting, until the legal obligations are not put in place) or reporting involving a few sectors, or few substances, etc. The results are more efficient, if it is possible to build on and use the former project results and resources.
* The commitment for the development and operation of the PRTR on the high level by the relevant authorities is necessary for the effective process. This should also include regular allocation of resources in the yearly budget for the human, technical needs ( proper number of staff, technical equipment and IT personnel), as well as capacity building for them, to ensure the smooth operation of PRTR.
* It is beneficial to promote the PRTR within the institutions hosting the PRTR (ministries or agencies) and gain the support of the different other departments within the Agency or Ministry, as well as their cooperation, for the successful approval and operation of the PRTR.
* Sharing of the experiences among the different countries and learning from their experiences and good practices could help to make a faster progress to build operational PRTRs.
* Transparency of the PRTR development should be ensured, the key stakeholders (representatives of the relevant authorities, operators and CSOs) should be informed and opportunities should be provided for commenting the proposal and plans for establishing the PRTR, as well as the basic legal and policy documents necessary for its creation.
* It is necessary to motivate operators to comply with their reporting obigations, explain the benefits of PRTR, refer to the shared common responsibilities regarding the protection of environment, and provide incentives where possible. In case of consistent non-compliance by operators with reporting obligations, administrative measures could also be applied. (Stick and carrot.)
* Regarding the development of the software and its use and maintenance, a stable and clear agreement should be concluded with software providers.
* Good practice examples:

 - Using a basic common software for several countries, with modular approach, could be a cost-efficient option. In the South Eastern European region, the option for making progress together, based on a common software, towards implementing the current and the future EU requirements, and obligations stemming from a possible amendment of the Protocol on PRTRs, could offer opportunity to go together and share costs of further software solutions, also in the future.

- Trainings for operators could be combined with a study trip to companies with good PRTR reporting practices.

The project currently is in the final phase, a sub-regional workshop has been recently held in Tirana, on March 12-13, 2024, to share the experiences among the project countries, as well as with other countries in the region, and with EU countries. The representatives of the UNECE Protocol on PRTRs, the OECD Secretariat’s Working Party on PRTR, and the European Environmental Agency also attended and contributed to the workshop.

The project’s final report will be soon prepared and the results of the project will be disseminated though various channels.

The above information is based on the evaluation of the Project Manager. We are ready to provide more information or answer any questions, if needed.

\* Reference to Kosovo understood in the context of UN Security Council resolution 1244 (1999)