

## Draft ESPP input to consultation on European Pollutant Release and Transfer Register (E PRTR) open to 26 October 2020

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12583-Industrial-pollution-revision-of-the-European-Pollutant-Release-and-Transfer-Register>

ESPP (European Sustainable Phosphorus Platform) considers that the E PRTR is an important and effective tool for ensuring public access and transparency of environmental data.

ESPP welcomes the Roadmap proposal to improve the contribution of E PRTR to Circular Economy objectives by including data on resource consumption. We would suggest to also **include data on resource recycling** with the objective of moving towards an “E SRTR” Substance Release Transfer and Recycling Register.

ESPP regrets that at present large poultry, pig and fish farm installations but not cattle farms are covered, and suggests to **add cattle production** (LSU equivalent to the current E PRTR 750 sows threshold).

ESPP welcomes the Roadmap proposal to widen the list pollutants to include emerging pollutants. In particular, we underline the need to monitor and to inform the public concerning PFAS/PFOS (perfluoroalkyl chemicals), following the new EFSA safety limit (Opinion 9 July 2020), pharmaceuticals (human and veterinary) and microplastics.

A mechanism should be established to ensure that the E PRTR list is automatically updated to reflect updates to the Water Framework Directive Priority Substances List (2013/39/EU) which includes substances not in E PRTR: PFOS and its derivatives, a number of pharmaceuticals, brominated flame retardant HBCDD