


Format for the Protocol on Pollutant Release and Transfer Registers Implementation Report in accordance with Decision I/5 (ECE/MP.PRTR/2010/2/Add.1)

CERTIFICATION SHEET

The following report is submitted on behalf of

The Republic of Croatia

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Signature:	
Date:	11/03/2025

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Provide a brief description of the process by which this report has been prepared, including information on which types of public authorities were consulted or contributed to its preparation, how the public was consulted and how the outcome of the public consultation was taken into account and on the material which was used as a basis for preparing the report.

Answer:

The draft of this Report on the Implementation of the Protocol on Pollutant Release and Transfer Registers was prepared and coordinated by the Ministry of Environmental Protection and Green Transition in cooperation with public authorities responsible for the protection of environmental components.

For the purpose of preparing the IV. National Report for the period 2021-2024, new information was included in the text of the III. National Report (2017-2020) showing the development and improvement of the system for the implementation of the Protocol on Pollutant Release and Transfer Registers.

The draft of this Report on the Implementation of the Protocol on Pollutant Release and Transfer Registers was prepared and coordinated by the Ministry of Environmental Protection and Green Transition (hereinafter referred to as MEPGT) in cooperation with public authorities responsible for the protection of environmental components. The draft of the Report was subsequently sent to the appointed representatives for work in the Working Group for the preparation of a report on the implementation of the Aarhus Convention (UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters). The Working Group consists of representatives of state and public institutions, local and regional self-government and non-governmental organizations. The comments received were processed and incorporated into the text of this Report.

According to the Decision of the Croatian Government, the former Environmental Protection Agency (hereinafter referred to as: CEA) merged with the State Institute for Nature Protection (SINP) in 2015 into a new agency: the Croatian Environment Agency (hereinafter referred to as: CAEN). CAEN became part of the Ministry of Environment and Nature in 2019, under the name of the Institute for Environment and Nature (hereinafter referred to as the Institute).

By the Government Decision, the Ministry of Environment and Nature became an integral part of the Ministry of Economy, which changed its name to the Ministry of Economy and Sustainable Development (hereinafter referred to as MESD). After the 2024 Parliamentary elections, the MEPGT was re-established.

All three institutions are mentioned in this Report, depending on the year from which the information cited originates.

As of 2019, the Environmental Protection Inspectorate ceases to be a part of the former Ministry of Environmental Protection, and is located within a new institution, the State Inspectorate of the Republic of Croatia (hereinafter referred to as: SIRC), together with other inspections. The jobs and tasks of this inspection did not change.

Articles 3, 4 and 5

List legislative, regulatory and other measures that implement the general provisions in articles 3 (general provisions), 4 (core elements of a pollutant release and transfer register system (PRTR)) and 5 (design and structure).

Describe the following in particular:

(a) With regard to the provisions of Article 3, paragraph 1, describe the measures taken to implement the provisions of the Protocol, including enforcement measures:

Answer:

There are several national laws and by-laws that create a framework for the implementation of the Protocol:

Law on Confirmation of the Protocol on Registers of Releases and Transfers of Polluting Substances with the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (hereinafter: Protocol) (NN-MU 4/2008);

Law on Confirmation of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (hereinafter: the Aarhus Convention) (NN-MU 1/2007);

Environmental Protection Act ("Official Gazette" No. 80/13, 153/13, 78/15, 12/18; 118/18) (hereinafter: EPA);

The Ordinance on the Environmental Pollution Register (Official Gazette No. 35/08) was replaced in 2015 by the Ordinance on the Environmental Pollution Register (Official Gazette No. 87/15), and the same was replaced in 2022 by the third Ordinance on the Environmental Pollution Register (Official Gazette No. 3/22, hereinafter: the Ordinance on the Environmental Pollution Register) with the aim of further improving the system and improving the quality of data collected through it.

The changes compared to the Ordinance from 2015 are:

- the number of forms remained the same, but certain points within the forms were changed in order to improve data (e.g. the "upload" of the environmental permit into the organizational unit form: PI-2 was ensured);

- the part of statistics and administration was improved and the data overview for competent authorities in counties was reviewed through their existing user accounts;

- the list of activities was revised (Annex 1. List activities) in such a way that the same activities were removed (one in 10 places) and new activities (26) were added, and certain names of activities were edited;

- within Annex 2 (List of pollutants), new substances with the collective name (Polychlorinated naphthalenes (PCN), including dichlorinated naphthalenes, trichlorinated naphthalenes, tetrachlorinated naphthalenes, pentachlorinated naphthalenes, hexachlorinated naphthalenes, heptachlorinated naphthalenes, octachlorinated naphthalenes;

- pollutant: Particulate matter (PM10) (from combustion) has been replaced with a division into three substances: Particulate matter (PM10); Solid particles and Powdery substances;

- the deadline for preparing a national report on data from the Environmental Pollution Register (hereinafter: EPR database), has been shortened from December 1 to October 1 of the current year for data from the previous year (Article 24, paragraph 1).

The Ordinance on Environmental Pollution register defines the mandatory content and method of maintaining the EPR, those obliged to submit data, the method, methodology and deadlines for collecting and submitting data on emissions or releases, transfers and disposal of pollutants into the environment and waste, data on the polluter, operator facilities, organizational unit in the polluter system, deadline and method of informing the public, method of checking and ensuring data quality, deadline for data storage, method of performing professional tasks of managing the EPR.

The abundance and diversity of data arise from the fact that the data are collected from a wide range of industrial and non-industrial activities, therefore the EPR system is a significant and comprehensive source of data on the types and quantities of pollutants, as well as on the types and quantities of waste produced, collected and processed.

Furthermore, the EPR system is an important tool for continuously monitoring trends and progress in reducing environmental pollution, as well as for monitoring compliance with certain international

agreements and determining priorities and assessing progress achieved by the environmental protection policy and programs of the Republic of Croatia.

It is necessary for the public, state and various county bodies, industry, scientists, non-governmental organizations and other decision-makers, as a unique system by which insight into the state and trends in the state of the environment and decision-making on environmental protection issues is ensured.

In addition to national needs, the establishment and implementation of the EPR system also ensures the fulfilment of the international obligations of the Republic of Croatia regarding the control of releases and transfers of pollutants.

The EPR system is part of the Industry and Energy Information System (IEIS), which is an integral part of the Information System for Environmental Protection (hereinafter: ISEP). The same is established, coordinated and maintained by the Institute in accordance with the Environmental Protection Information System Act and the Regulation on the Environmental Protection Information System (Official Gazette No. 68/08) (hereinafter: ISEP Regulation). Since 2015, databases and information from the field of nature have been added to the Environmental Protection Information System (Information System for Nature Protection, ISNP). There is a continuous effort to connect information systems.

In order to improve the EPR system, the following projects led by the former CEA and the following CAEN were completed:

1. "Improvement of the Croatian Environment Pollutant Register and its Integration into the Croatian Environmental Information System (CEIS)". The project partners were: Austrian Environmental Agency, The Interprofessional Technical Centre for Studies on Air Pollution (CITEPA), France, Federal Environment Agency, Germany. As part of the project improvement of the EPR system in its entirety, together with the connected newly built portal (CNPEPR2), the improvement of the public EPR Browser was carried out, as well as the harmonization of EPR data with data from other databases and work areas, primarily data from the areas of climate change, air, waste and wastewater. One of the results of the project is the improvement of data validation and quality control (QA/QC) procedures in the form of new software tools for calculating air emissions and manuals for air emissions, intended for taxpayers as an aid in reporting and calculating air emissions and for competent authorities when verifying data. In addition, a series of trainings and workshops were conducted for the employees of the Institute and other services of the MEPGT, the Inspectorate, the competent authorities and those liable for the EPR. Visits to industrial plants in the Republic of Croatia and a study trip to visit the Austrian Environmental Agency and Austrian operators were conducted (2016-2018).

Link: <http://www.haop.hr/hr/tematska-podrucja/otpad-i-registri-oneciscavanja/postrojenja-i-registri-oneciscavanja/projekti>

2. Transition Facility: "Chemicals and hazardous substances monitoring improvement and integration of Seveso database into Croatian Environmental Information System (CEIS) as the unique Central Seveso Information System (CRO SEVESO)". The aforementioned project ensured the harmonization of data from the area of EPR/Seveso/climate change (2017 - 2019). More at the link: <http://www.haop.hr/hr/tematska-podrucja/otpad-i-registri-oneciscavanja/postrojenja-i-registri-oneciscavanja/projekti-8>

The results of the projects components are still incorporated into the EPR database and are functional today.

(b) With regard to Article 3, paragraph 2, describe the measures taken to establish a PRTR that is more comprehensive or more publicly available than that provided for in the Protocol;

Answer:

Data on releases and/or transfers of pollutants and waste generated, collected and treated as a result of a number of activities are collected into the EPR system from point sources of pollution in accordance with the provisions of the EPR Ordinance. The current Croatian system covers significantly more pollutants with mostly lower release and/or transfer thresholds. Thus, Annex 1 to the EPR Ordinance covered a significantly larger selection of industrial and non-industrial activities, with lower capacity thresholds than Annex I to the Protocol. In accordance with the new EPR Ordinance, as stated, there have been changes to both the list of pollutants (Annex II) and the list of activities (Annex I), but the content of the EPR system is still more extensive than that envisaged by the Protocol.

The public, industry, scientists, local authorities, non-governmental organisations, decision-makers and all interested parties have a good source of data at their disposal with the EPR system that can be used for various analyses and as a basis for decision-making on environmental and human health protection issues.

The principle of access to information and public participation is defined in Article 17 of the Environmental Protection Act (Official Gazette, No. 80/13, 153/13, 78/15, 12/18, 118/18). The principle of encouragement is defined in Article 18 and the Principles of the Right to Access to Justice; the same is aligned with the Aarhus Convention.

Free indirect access to PRTR data is available to experts and other interested public via:

- The website of the MEPGT and the Institute, <https://mingor.gov.hr/> [https://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri](https://www.haop.hr/hr/https://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri)

More details:

- Annual reports from the EPR database (national PRTR database)
- <http://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri-2>
- Reports and indicators that are publicly available on the Institute's website, <https://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registrar-2>
- The Environmental Pollution Register Browser (hereinafter: the EPR Browser) published in March 2012. It contains data on all parties subject to the EPR system, which is a significantly larger volume of data than those covered by the Protocol requirements. The EPR Browser is intended for searching data aggregated by organizational units, of all EPR system obligors, while respecting the provisions of the Data Secrecy Act (Official Gazette, No. 79/07, 86/12).
- Public data was available on the first Croatian National Portal of the Environmental Pollution Register (hereinafter: CNPEPR), created and published for the public in 2012 in accordance with the provisions of the Protocol. During the construction of the new EPR database in 2018/2019, the Portal was integrated into the second Portal (CNPEPR2) created during the aforementioned CRO EPR project (p. 4). The contents of the Portal have been integrated into the ENVI Environment Atlas since 2022.

The competent authorities for the validation of EPR data, the counties and the City of Zagreb (altogether 21 counties), which closely cooperate with MINGOR by performing their prescribed tasks of checking the completeness, consistency and credibility of the submitted data and then verifying it, also participate in the transparency of EPR data by informing the public about EPR data in their county.

(c) with regard to Article 3, paragraph 3, describe the measures taken to prevent employees of the obliged entity and representatives of the public who report to public authorities' violations of national laws related to this Protocol by the obliged entity from being punished, prosecuted or harassed for such reporting.

Answer:

The right of persons exercising their rights not to be punished, prosecuted or harassed is ensured through the constitutional principle of legality under Article 16 of the Constitution of the Republic of Croatia (Official Gazette No. 85/10 – consolidated text) and the principle of the right to appeal under Article 18 of the Constitution of the Republic of Croatia.

The protection of persons who report corruption in good faith in the Republic of Croatia is provided for in: Article 131. Criminal Code ("Official Gazette" No. 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19, 84/21, 114/22, 114/23, 36/24); Labor Law ("Official Gazette" No. 93/14, 127/17, 98/19, 151/2022); of the Law on Civil Servants ("Official Gazette" No. 92/05, 142/06, 77/07, 107/07, 27/08, 34/11, 49/11, 150/11, 34/12, 49/12, 37/13, 38/13, 1/15, 138/15, 61/17, 70/19, 98/19, 155/23); Article 32. of the Law on officials and employees in local and regional (regional) self-government ("Official Gazette" no. 86/08, 61/11, 04/18, 112/19); Article 25. Data Confidentiality Act ("Official Gazette" no. 79/07, 86/12); Article 36. Law on the Internal Control System in the Public Sector (Official Gazette No. 141/06, 78/15, 102/19); Law on Trade (Official Gazette No. 87/08, 96/08, 116/08, 114/11, 68/13, 30/14, 32/19, 98/19, 32/20, 33/23).

(d) with regard to the provisions of Article 3, paragraph 5, indicate whether the PRTR system is connected to other reporting mechanisms and, if such connection has been made, with which systems? Did such linking lead to a reduction in multiple reporting? Did any particular challenges arise or were certain challenges overcome during the connection and how?

Answer:

Continuous work is being done on the improvements of ISEP in order to make it easier for data providers (industry) to report data while simultaneously providing high quality data. Special challenges arise when finding solutions to make reporting easier for taxpayers, given the number and complexity of binding regulations. It is also a challenge to find links to integrate databases that, in accordance with environmental protection regulations, require access to various data and are often not harmonized in the IT sense.

Regarding the internal and external connectivity of the ISEP system, an independent assessment (audit) of all existing systems and databases within MEPGT/Institute, the Croatian Meteorological and Hydrological Service (hereinafter: CMHS), the Environmental Protection and Energy Efficiency Fund (hereinafter: EPEEF) and MEPGT/Institute was conducted. This was a component of the first phase of implementation and establishment of an online portal for environmental data (hereinafter: ENVI portal) whereby spatial data are being adapted to EU standards, the INSPIRE Directive and the Act on National Spatial Data Infrastructure (Official Gazette, No. 56/13, 52/18, 50/20).^{*} Selected data from the EPR system and other selected MEPGT/Institute databases were georeferenced for the purpose of spatial presentation and analysis in an Internet GIS browser as a component of the ENVI portal.

^{*}Commission Implementing Decision (EU) 2019/1372 of 19 August 2019 implementing Directive 2007/2/EC of the European Parliament and of the Council as regards monitoring and reporting (notified under document C(2019) 6026).

The data from the EPR system are directly used by the EPEEF for the purposes of calculating and collecting fees from environmental polluters for CO₂ emissions, and the automation and better linking of the above was established during one of the upgrades of the EPR system through improvements to the reporting part of the system and in accordance with the specification prepared for the needs of the EPEEF. The data from the EPR system are also used for the collection of other fees in the field of environmental protection.

Due to the comprehensiveness of the data collected in the EPR system, the data is used to prepare over thirty reports under international treaties and EU directives as a basic set or as a data set that is supplemented from other sources as needed, which has somewhat reduced multiple reporting. The new EPR system enables better connectivity and use of data and facilitates the delivery, collection and quality control of the same, as well as reporting.

MEPGT and the Institute continuously maintains, upgrades and improves databases in accordance with legal changes and the introduction of new laws and regulations, but also with the aim of facilitating reporting by both taxpayers and the Republic of Croatia to European and international bodies. This includes better and easier quality control and verification of data by competent authorities, as well as transparent public access to environmental and nature data.

As stated, the goal is to facilitate reporting while maintaining a high level of data quality.

The conclusion is that the aforementioned upgrades and improvements to the ISEP make it possible to somewhat simplify data reporting for operators, quality control for competent authorities and implementation reporting for institutions, but also that a significant reduction in reporting can be achieved primarily by reducing and integrating changes at the regulatory level.

(e) having regard to the provisions of Article 5, paragraph 1, describe how releases and transfers can be searched and identified in accordance with the parameters set out in subparagraphs (a) to (f);

Answer:

ENVI and the Public Portal of EPR allow searching by the following criteria: year, county, city/settlement, operator, organizational unit (plant), industrial activity and sub-activity, spatial overview, release and/or transfer of pollutants, aggregated groups of substances (chlorinated organic substances, greenhouse gases, heavy metals, inorganic substances, other gases, other organic substances and pesticides), environmental components (air, water and/or sea, soil) and waste transfer. A georeferenced cartographic overview of data with an accurate representation of the organizational unit at a location within the borders of the Republic of Croatia is also enabled.

(f) with regard to the provisions of Article 5, paragraph 4, describe how the URL or web address that enables permanent and direct access to information from the register or other electronic means with the same effect is provided.

Answer:

The EPR system is built in such a way that it is available on the main website of the current Institute: <http://www.azo.hr/Default.aspx> and on the direct link; <http://roo.azo.hr/>

The data delivery and verification cycle are performed online via the EPR application.

Accessibility and permanent and direct access to information from the register and via the URL address of the EPR Browser: <http://www.haop.hr/hr/baze-i-portali/preglednik-registra-oneciscavanja-okolisa> is ensured by the Institute's infrastructure, by placing the register, portal and browsers on a publication server with a permanent Internet connection. The direct link to the ENVI Portal is: <https://envi-portal.azo.hr/> while the EPR database is visible on the Portal within the section Atlas of the Environment – Industry and Energy: <https://envi.azo.hr/?topic=9>

Data of EPRTR obliged entities of the EPR database are also available on the European Industrial Emission Portal (European Industrial Emission Portal). Link: <https://industry.eea.europa.eu/>

These are data only of those national obliged entities that have exceeded the thresholds of capacities and quantities of pollutants and waste according to the European Regulation on EPRTR (O.G. 166/2006; replaced in 2024 with the new Regulation on the Industrial Emissions Portal). Link: https://environment.ec.europa.eu/topics/industrial-emissions-and-safety/industrial-emissions-portal-regulation-iepr_en

(g) With regard to the provisions of Article 5, paragraphs 5 and 6, please provide information on the connection of the Party's registry with relevant existing, publicly available databases thematically related to environmental protection, if any, and the connection with PRTRs of other Parties to this Protocol.

Answer:

The EPR system, built within the ISEP, contains the EPR database, which is a source of a range of environmental data, for example on the state and pressures of individual environmental components, spatial features and other data and information important for monitoring the state of the environment at the national level, as well as the ENVI portal and the EPR browser.

The EPR system has built-in mechanisms, filters and predefined reports for the purpose of searching for obligated parties who are subject to other international obligations, in addition to the Protocol and the E-PRTR. This way, information can be found on whether a particular facility is, for example, "Seveso" liable party (defined in accordance with the Regulation on the prevention of major accidents involving dangerous substances, ("Official Gazette" No. 144/14)) and the Ordinance on the register of installations in which dangerous substances are present and on the register of reported major accidents ("Official Gazette" No. 139/14) or IPPC liable party (IED), i.e. whether it holds an environmental (IPPC) permit (in accordance with the Regulation on environmental permits ("Official Gazette" No. 08/14)) and the Ordinance on the register of operating permits which establish unified environmental protection conditions and decisions on unified environmental protection conditions for existing installations ("Official Gazette" No. 113/08) and subsequently the Ordinance on the register of issued environmental permits ("Official Gazette" No. 51/16). In the event that the liable party holds an environmental permit, it can be entered into the EPR database to facilitate data quality control. Also, one of the filters and predefined reports within the EPR system is the "ETS" filter, which enables a search and a more detailed overview of the greenhouse gas emission allowance trading system's obligors. In addition to the above, there is also a filter for the so-called "LCP" obligors, which enables a review and search of data of obligors for whom a report is submitted in accordance with the LCP Directive. They are included in reporting according to the new E-PRTR XML schema, according to which the first reporting was carried out in 2020. Improvements to the aforementioned mechanisms, filters and searches were also ensured through the projects listed in the answers to the questions related to Articles 3, 4 and 5 (points 4 and 5).

MINGOR/Institute reports in accordance with the requirements of the European Information and Observation Network (EIONET) via Internet services such as ReportNet, which is an IT infrastructure for supporting and improving data and information flows and is based on a series of interconnected tools and processes built on the active use of the Internet.

Part of ReportNet is also the CDR (Central Data Repository). CDRs are Internet services for the delivery of data and reports organized according to relevant reporting obligations or agreements, and data from the EPR database is used for a whole series of reports. Some of them are reports related to: CLRTAP Convention, IED (IPPC, LCP), ICPDR, Stockholm Convention, POPs Reports, Waste Statistics Regulation, Basel Convention, etc.

Data from EPR for E-PRTR (ROD, in xml. file format) was sent for the first time in March 2016 (with resubmission in May 2016, following an invitation to member countries (ZČ) by the EC). A total of 120 locations were registered.

In addition to the data set submitted for E-PRTR, other reports (data sets) of the Republic of Croatia according to thematic areas (including those for which EPR system data are used) were submitted to ROD (Reporting Obligations Database) in accordance with reporting obligations. ROD is also part of ReportNet, and within it the reporting obligations of individual member states towards international organizations and institutions are listed.

Following the first reporting, the Republic of Croatia continuously submits data sets annually to ROD, EIONET and Eurostat, with additional re-submissions defined by the European Commission. This work also includes possible responses to instructions and correspondence with expert teams from the European Environmental Agency and Eurostat, which carry out quality control and verification of the submitted data sets for the Republic of Poland and the Republic of Croatia.

In the last data set submitted in 2020 as part of the first consolidated report for EPR and large combustion devices, 124 locations were reported (124 E-PRTRs, of which 22 are large combustion devices). In addition, the ENVI portal has become part of the global PRTR network, and the MINGOR/Institute's

website contains links to some useful pages and some national PRTR registers of UN member states that are signatories to the Protocol. Link: <http://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri>

Članak 7.

Please indicate the legislative, regulatory and other measures taken to implement Article 7 (reporting obligations).

Please describe or, where appropriate, identify the following:

(a) with regard to paragraph 1, indicate whether the national system supports the reporting requirements referred to in paragraph 1(a) or 1(b);

Answer:

The submission of data to the EPR system is defined in Title III. "Submission of data", Articles 9-21 of the Ordinance on Environmental Pollution register. Title III. lays down the conditions for sending data, how the data are collected and how the data are to be submitted. It also lays down the forms for submitting data and the description of the forms, divided into general forms and forms by subject area, which are set out in the Annexes to the Ordinance on Environmental Pollution register.

(b) s obzirom na stavke 1., 2. i 5., navedite da li je vlasnik pojedinog postrojenja obavezan ispuniti zahtjeve u vezi izvještavanja ili je za isto odgovoran operater;

Answer:

The person obliged to submit data (operators) is defined in Article 4 of the Ordinance on Environmental Pollution register and reads as follows: "The person obliged to submit data is the operator and the responsible person of the organizational unit that performs activities from Annex 1 of this Ordinance that result in the release and/or transfer of pollutants into the environment from Annex 2 of this Ordinance and/or the generation or management of waste". Data reporting to the EPR is carried out electronically, on-line directly into the EPR, in such a way that the operator fills in one general form PI-1, while all other forms are filled in by the organizational unit, i.e. the facility at a particular location. The operator has access to all forms of its organizational units, while each organizational unit has access only to its own forms.

(c) With regard to paragraph 1 and Annex I, please indicate the differences between the list of activities to which the reporting obligation applies in accordance with the Protocol, i.e. the list of associated thresholds, and the list of activities and associated thresholds to which the reporting obligation applies in accordance with the national PRTR system.

The national data collection system through the EPR covers a larger range of activities in accordance with Annex 1. List of activities to the Ordinance on Environmental Pollution register. At the same time, it is also possible to select activities in accordance with Annex I. Activities of the Protocol. This means that data collection is in line with the requirements of the Protocol at the level of ordinance and their implementation.

Comparing the activities in Annex 1 of the Ordinance and Annex I of the Protocol, it is noticeable that the activities are elaborated in more detail, and the number of employees is not introduced as a threshold. This provides more complete information about the obliged entity and the activities resulting in the release of emissions into the environment, as well as a larger range of data collected. Individual activities are elaborated in more detail, e.g. Offshore activities (platforms) and activities within section 11. Other activities (listed in Annex 1.).

(d) With regard to paragraph 1 and Annex II, please indicate the differences between the list of pollutants subject to reporting obligations under the Protocol, or the associated thresholds, and the list of pollutants and associated thresholds for which reporting obligations are prescribed by the national PRTR system;

Answer:

Since the Protocol, in its general provisions, Article 3, paragraph 2, allows Parties to establish more comprehensive national registers, the PRTR system, in accordance with national legislation, in addition to having a larger number of pollutants, has significantly lower or stricter release and/or transfer thresholds for most pollutants than the thresholds required by the Protocol.

Table 1 of this report contains a comparative table of release thresholds for those pollutants for which there is a difference between the national system and the Protocol (PRTR Regulations, Annex 2, “List of Pollutants”; Protocol, Annex II, “Pollutants”).

With the entry into force of the Ordinance on the EPR, the differences in thresholds for individual pollutants have been reduced. More on the differences can be found at the end of this Report.

(e) With regard to paragraph 3 and Annex II, please describe whether, for any pollutant(s) listed in Annex II to the Protocol, the Party applies a threshold type other than that specified in subparagraph (a) and, if so, why.

Answer:

When adopting the Ordinance on the EPR, it was decided, due to national strategic objectives for the conservation of natural resources and the environment and a more comprehensive and detailed overview of environmental pressures, to apply stricter discharge thresholds for some pollutants than those in the Protocol. Thus, stricter rules were applied for 39 pollutants for releases to air, 25 for releases to water and one (1) for soil, which increased the amount of information available on releases and/or transfers of pollutants.

(f) with regard to paragraph 4, indicate the competent authority for collecting information on releases of pollutants from diffuse sources referred to in paragraphs 7 and 8;

Answer:

The competent authority for collecting information on releases of pollutants from diffuse sources referred to in paragraphs 7 and 8 is not defined for all releases, as further explained in answer (h).

(g) with regard to paragraphs 5 and 6, describe the differences between the amount of information that owners or operators are required to provide under the Protocol and the amount of information that they are required to provide under the national PRTR system and indicate whether the national system is based on reporting transfers at the level of individual pollutants (paragraph 5 (d) (i)) or individual waste types (paragraph 5 (d) (ii));

Answer:

Based on the provisions of the new Ordinance on Environmental Pollution Register, data are based on reporting for individual pollutants from the 2017 reporting year with direct information on whether they are direct releases or transfers for further treatment. At the beginning, with the first Ordinance from 2008, there were much stricter thresholds for some pollutants, as was described in previous reports. That led to reporting obligations for schools and kindergartens and small businesses. Due to the above, the air emission thresholds for certain pollutants have been reduced, with the Ordinance from 2015, with the aim of eliminating the obligation for certain public institutions as well as small businesses.

Waste is reported at the location level with the associated key numbers in accordance with the Ordinance on the Waste Catalogue (Official Gazette 90/15), which is aligned with the European List of Waste, is now inside the Ordinance on Environmental Pollution register. Sheets for waste are the most complex, due to fact that in this EPR database data are stored for more obligations regarding Waste Management.

(h) with regard to items 4 and 7, if emissions from diffuse sources are included in the register, describe which diffuse emissions are included and how users can search for or identify them in the associated spatial display; or, if not included, provide information on the measures taken to initiate the reporting procedure for diffuse emissions.

Answer:

The Ordinance on Environmental Pollution register does not prescribe an obligation to report diffuse emissions, therefore the EPR system does not contain data of this type.

At the national level, part of the emissions from diffuse sources into the air are processed in two national reports prepared by MEPGT:

1. In accordance with the provisions of the Regulation on the monitoring of greenhouse gas emissions, policy and measures for their reduction in the Republic of Croatia ("Official Gazette" No. 05/2017), the "National Inventory Report" is prepared, which contains data on six greenhouse gases (CO₂, CH₄, N₂O, HFCs and PFCs and SF₆) and indirect greenhouse gases (CO, NO_x, NMVOC and SO₂) from six different sectors (energy, industrial processes, solvents and other products, agriculture, land use, land use change and forestry, waste management).

2. In accordance with the Regulation on emission quotas for certain pollutants in the Republic of Croatia ("Official Gazette" No. 108/13), the Institute prepares a pollutant emission calculation and a report "Emissions of pollutants into the air in the territory of the Republic of Croatia" with the aim of fulfilling obligations under the LRTAP Convention.

Furthermore, based on the report of the Central Bureau of Statistics on fuel consumption in transport, it is possible to calculate emissions from transport as one of the sectors from which diffuse emissions into the environment occur. More information can be found at the link: <https://www.dzs.hr/>

Additional data on the consumption of energy types (coal and coke, wood and biomass, liquid fuels, gaseous fuels, hydropower, electricity, renewable sources) by sectors (industry, transport, agriculture, households) can be found in the publication "Energy in Croatia" (2013-2022), Annual Energy Review, Ministry of Economy and Sustainable Development of the Republic of Croatia.

Additional information at the link:

https://mingo.gov.hr/UserDocsImages/slike/Vijesti/2022/Energija%20u%20HR%2022_WEB_%20Velika.pdf

<http://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/sektorski-pritisci-1>

The latest Report refers to 2022.

The project to build a high-resolution pollutant emissions register with spatial distribution in the EMEP high-resolution network was completed in 2018. The legal basis for the implementation of this project is contained in the Air Protection Act (Official Gazette No. 130/11, 78/15, 47/14) and the Plan for Air Protection, Ozone Layer and Climate Change Mitigation in the Republic of Croatia for the period 2013-2017 (Official Gazette No. 139/13).

The following results were achieved with this project:

1. A register for emissions from small and diffuse sources and other existing mobile and stationary sources on the territory of the Republic of Croatia, according to agglomeration zones (Zagreb, Rijeka, Split and Osijek) and separately for the city of Slavonski Brod.
2. A spatial distribution of pollutant concentrations in the EMEP network with a resolution of 0.1x0.1 long-lat. (approximately 10x10 km) was developed for the entire territory of the Republic of Croatia, and for agglomerations on a spatial scale of 0.5 km x 0.5 km
3. Spatial and expert bases were developed to meet technical requirements for the adoption of measures and plans aimed at reducing the impact of pollution, depending on emissions, atmospheric conditions and chemical properties.
4. Spatial distribution ensures air pollution modelling and thus provides a comprehensive overview of the exposure of the population, ecosystems and Natura 2020 and Threats to Natura 2000.

Based on the construction of these registers, continuous monitoring of diffuse emissions is carried out in the Republic of Croatia.

(i) regarding paragraph 8, describe the different methodologies used to obtain information on diffuse sources.

Answer:

Emissions of pollutants that are processed in the report: "Emission of pollutants into the air in the territory of the Republic of Croatia" are calculated on the basis of standard methods and procedures based on the EMEP/EEA Air Pollutant Emission Inventory Guidebook.

Technical Report No. 12/2013" (2013) and the Methodologies used to calculate emissions for the "National Inventory Report" are based on "The 2006 IPCC Guidelines for National Greenhouse Gas Inventories and the Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories" prepared by The Intergovernmental Panel on Climate Change (IPCC).

The methodology for calculating fuel consumption in traffic by energy sources and consumption sectors is defined by the Energy Balance Methodology, which is prescribed by the Ordinance on Energy Balance ("Official Gazette" No. 33/03).

The assessment of water load from scattered sources of pollution is made by *The Croatian Waters*, main institution for the purposes of creating the Water Area Management Plan. They use official sources of data, such as the Central Bureau of Statistics, as well as data collected from other competent institutions. The methodology for assessing the load has also been developed until 2027 ("Official Gazette", No. 84/23) (<https://voda.hr/hr/plan-2022-2027>).”

More about the reports themselves and the legal basis is given in answer (h) of this Article 7.

Članak 8.

For each reporting cycle since the last national implementation report (or the date of entry into force of the Protocol), please indicate:

(a) the reporting year (the calendar year to which the report relates);

Answer:

The report on EPR data is prepared pursuant to the Ordinance on Environmental Pollution register on the basis of data collected through the EPR system application. Data within the EPR system is collected for the previous calendar year, and reports are published by 1 October of the current year for data from the previous calendar year.

Compared to the previous III. Report, 8 new Reports have been prepared and made available to the public according to data from the EPR database.

So far, 25 Reports have been published, as follows:

Reports on data from the EPR:

[Izvešće o podacima iz Registra onečišćavanja okoliša za 2023. godinu](#) i prateći [Pregled podataka na razini županija za 2023. godinu](#)

[Izvešće o podacima iz Registra onečišćavanja okoliša za 2022. godinu](#) i prateći [Pregled podataka na razini županija za 2022. godinu](#)

[Izvešće o podacima iz Registra onečišćavanja okoliša za 2021. godinu](#) i prateći [Pregled podataka na razini županija za 2021. godinu](#)

[Izvešće o podacima iz Registra onečišćavanja okoliša za 2020. godinu](#) i prateći [Pregled podataka na razini županija za 2020. godinu](#)

[Izvešće o podacima iz Registra onečišćavanja okoliša za 2019. godinu](#) i prateći [Pregled podataka na razini županija za 2019. godinu](#)

2018., 2017., 2016., 2015., 2014., 2013., 2012., 2011., 2010., 2009. i 2008.,

[Izveščaja za 2007.g.* \(zrak, vode, komunalni otpad i proizvodni otpad\)](#)

*These reports were prepared based on data on individual environmental components and waste. The Environmental Emissions Register came into force in 2008, and the year in question was a transitional year due to the method of reporting, collecting, processing and reporting on data that was prescribed and organised only for that year. Data for 2007 were collected based on data for the new first database Environmental Emissions Register submitted in Excel forms (because the database for not finished – at the end it was finished in less than a year).

Before the entry into force of the first Ordinance on Environmental Pollution Register in 2008 and the creation of the first EPR database, data were collected based on the Ordinance on Cadastre of environmental emissions (Official Gazette, No. 36/96).

(b) the deadline(s) by which the owners or operators of the installations are required to report the data to the competent authority.

Answer:

According to the Ordinance on Environmental Pollution register, operator forms (PI-1) are to be submitted electronically by 1 March of the current year for the previous calendar year to the competent authority in whose territory the operator's registered office is located. Organisational unit forms (PI-2 and thematic) are to be submitted electronically by 1 March of the current year for the previous calendar year to the competent authority in whose territory the organisational unit is located (everything takes place within the EPR database). Subsequently, CAs conduct QA/QC until April 15 of the current year for the previous calendar year (Art. 21 of the Ordinance on Environmental Pollution register).

(c) the date by which the information covered by the register must be made publicly available, taking into account the requirements of Article 8 (reporting cycle);

The deadline and method of informing the public have been changed compared to the previous Ordinance on Environmental Protection from 2015, and in the new Ordinance on Environmental Protection they are prescribed in Articles 23 and 24. Public access to data reported in the Environmental Pollution Register, except for data classified in accordance with a special regulation on data confidentiality, is provided on the website of the MEPGT/Institute via a browser, annual reports and upon request in accordance with the Act on the Right to Access Information (Official Gazette, No. 25/13, 85/15 and 69/22).

MEPGT/Institute shall prepare an annual report on environmental protection data by 1 October of the current year for the previous calendar year and publish it on the website. This deadline has also been shortened by two months compared to the Ordinance on Environmental Protection from 2015. The ENVI Portal and the Institute's website provide public access to information in accordance with the Protocol (more in Articles 3, 10, 11 and 15).

MEPGT/Institute submits data (and, if necessary, resubmits it) to the European Pollutant Release and Transfer Register (reporting obligation EPRTR, EIONET, ROD, Eurostat) within the submission deadlines set by the EC.

(d) whether in practice the reporting deadlines by the obliged entities, or the deadlines for ensuring public access to information from the register, are respected; and, if not, for what reasons there are delays;

Answer:

In practice, reporting by operators is not always within the deadlines. Some operators are late in submitting data. It is prescribed that the competent authority (CA), ensures the verification of the completeness, consistency and credibility of the submitted data. As a result of the delay in reporting data by the obliged entities, there are delays in the scope of activities of the competent authorities. The Environmental Protection Inspectorate checks the fulfilment of obligations by the obliged entities through inspections, in accordance with Article 151, paragraph (5) of the Environmental Protection Act (EPA).

"The Environmental Protection Inspection of the SIRC verifies the fulfilment of prescribed obligations by inspection, in accordance with the article related to the Register of Environmental Pollution, Article 151, paragraph (5) of the Environmental Protection Act. In addition, the environmental protection

inspection carries out planned and unplanned inspections, as well as joint or coordinated inspections with other cooperative inspections.

"Coordinated inspections include operators of large industrial plants of complex systems from the energy, metal production and processing, mineral industry, chemical industry, waste management and other activities, including industrial plants for the production of paper or cardboard, slaughterhouses, processing and processing of raw materials for the production of food or animal feed, rendering plants, intensive breeding of animals (poultry and pigs) and surface treatment of substances, objects or products in which organic solvents are used, as well as the areas of the Seveso plant.

In relation to the target value of the performance indicator of this measure for 2024, i.e. the planned target value of the implementation of inspections by environmental protection inspectors in the field of industrial pollution (97 inspections), due to an extraordinary event in one facility that resulted in the failure to perform the facility's activities, environmental protection inspectors conducted 96 inspections and the inspection of the facility in question is planned to be carried out in 2025. In order to avoid the possible occurrence of risks and dangers to the environment, when planning and carrying out interventions or when carrying out their activities, operators are directed to apply the established preventive environmental protection measures, which implies the use of good practice, as well as the use of products, equipment and devices, and the application of production procedures and systems for maintaining the designed parameters of the facility that are most favourable for the environment¹. Link: <https://inspektorat.gov.hr/pristup-informacijama/planovi-i-izvjesca/planovi-i-izvjesca-284/284> “

The Environmental Protection Inspectorate publishes all its plans, work programs and reports for the public on the SIRC website. Link: <https://dirh.gov.hr/>

Based on the inspections carried out, data providers, after the deficiencies/irregularities indicated, sometimes have to report data to the EPR that was missing or update the report in terms of greater completeness and accuracy of the data. This also contributes to greater quality and accuracy of the data.

EPR Helpdesk employees have been continuously sending e-mails to CAs on a weekly basis since the beginning of the calendar year, to remind data providers of the deadlines for data submission. In addition, workshops are held, and instructions are developed for data providers and CAs, communication is also carried out via telephone calls, etc., all described in detail in this Report.

As a result, there is a small delay in achieving the deadlines set by national Ordinance on Environmental Pollution register. The above is not reflected in the response to the Protocol's requirements.

(e) whether and which electronic reporting methods were used to facilitate the entry of the required information into the national register and, if such methods were used, what was the share of electronic reporting by the obliged entities and whether any software applications served to support such reporting.

Answer:

As explained in the answers to the questions related to Articles 3, 4 and 5 of this Report, the EPR system was designed in such a way that data reporting is carried out electronically (“on-line”), which makes the entry itself much easier for obliged entities, operators and organizational units. NTs (county departments and the City of Zagreb) also carry out the verification of the submitted data “on-line”, directly in the system, through assigned user accounts.

It is particularly important that all competent inspectorates also have user accounts, which directly carry out data verification via the system, before and during inspections, and in accordance with their inspection plans. In this way, the implementation of the obligations of all stakeholders is accelerated and transparent, and all stakeholders in the process (including other institutions and the inspection) always use up-to-date data from the EPR, in accordance with the assigned authorities.

The EPR Ordinance stipulated that forms can be submitted electronically or on printed forms (Article 19, (1)). If the taxpayer submitted the forms on paper, the data entry into the EPR system was performed by his NT in the county (Article 19 (2)). Article 21, paragraphs (1) and (2) of the new Ordinance on Environmental Pollution register, and as described in Article 8 (b) of this Report, stipulates that the forms in the NT are submitted exclusively electronically.

¹Annual report on the implementation of the Implementation Program of the State Inspectorate for the period 2021-2024 in 2024 (Period from 1 January 2021 to 31 December 2024)

Based on the information received from the competent authorities, we conclude that the submission of data in accordance with Article 19 (2) varies from county to county. This is conditioned by the population density of a particular county, the demographic structure, and the number and type of taxpayers within individual counties. In the case where the taxpayers are more developed companies, with a larger number of organizational units, such companies have greater opportunities to submit data electronically. In the Republic of Croatia, there may still be a few taxpayers who need assistance from the CAs in filling out the forms on an annual basis.

Furthermore, regarding software applications, the national EPR system has been continuously upgraded from 2008 to the present. A new EPR database was built in 2019. Through each phase of the upgrade, software solutions were added with the aim of better data reporting by obligated parties (operators and locations) and better data work (collection, quality control, validation and reporting) by all EPR participants within the framework of their activities (instructions, "clouds" next to fields with clear instructions, drop-down menus, opening subfields depending on the situation on the ground, the impossibility of entering incorrect data, predefined reports and statistics, etc.). A great contribution is made by predefined reports. They are conceptual solutions of the EPR team with the aim of facilitating the withdrawal, aggregation and processing of data. The number of predefined reports increases every year. In 2024, there are 109 of them, classified into several categories: Statistical reports - 5; Wastewater - 12; Air - 17; Waste - 19; Municipal waste - 22; Construction waste - 6; Statistical yearbook - 3; Statistical reports - 9; Statistical data on waste - 16. Also, with each legal demand and upgrade, the number of code books built into the EPR database increases to make it easier for taxpayers to select individual data. In 2024, 22 code books were built.

Article 9.

Opišite zakonske, regulatorne i ostale mjere kojima se osigurava prikupljanje podataka i pohrana zapisa te utvrđuju metodologije korištene u prikupljanju informacija o ispuštanjima i prijenosima u skladu s člankom 9. (prikupljanje podataka i vođenje evidencije).

Odgovor:

Sukladno čl. 14. novog Pravilnika o EPR obveznik dostave podataka prikuplja podatke učestalošću određenom posebnim propisima da bi se za svaki ispuštaj odredilo ispuštanje i prijenos izvan mjesta nastanka onečišćujućih tvari i otpada. Za prikupljanje podataka obveznik je dužan primijeniti najbolje raspoložive informacije što može uključivati praćenje ispuštanja i prijenosa izvan mjesta nastanka, emisijske faktore, bilance tvari i procjene i druge metode u skladu s međunarodno priznatim metodama ako su iste dostupne. Obveznik je dužan najmanje pet godina čuvati podatke na temelju kojih su određena ispuštanja i prijenos izvan mjesta nastanka te opis metodologije primijenjene prilikom prikupljanja podataka.

Article 10.

Describe the rules, procedures and mechanisms that ensure the quality of the data contained in the national PRTR and what was determined based on them regarding the quality of the reported data, taking into account the requirements from Article 10 (quality assessment).

Answer:

The provisions from Article 22 of the Ordinance on Environmental Pollution register refer to data security and control. It is prescribed to carry out training of persons obliged to report data – operators and their facilities (meetings, workshops, seminars, informative materials and the like) by the competent authorities (local (regional) self-government). In addition, MEPGT/Zavod coordinates work on data quality assurance and control and conducts education of competent authorities (meetings, workshops, seminars, informational materials, etc.).

For this purpose, in 2008, a Manual for managing EPR was created, which contains instructions for working with EPR and procedures for data quality assurance, which is available on the /Institute website.

Furthermore, during the CRO EPR project, a Manual and a Tool for calculating air emissions were developed (p.5.) Link: <http://www.hoop.hr/hr/alat-za-izracun-emisija-u-zrak-roo/alat-za-izracun-emisija-u-zrak-roo>.

For this purpose, in 2008, a Manual for managing the EPR was created, which contains instructions for working with the EPR and procedures for ensuring data quality, and which is available on the Institute's website. The manual was updated in 2024 in the part of the instructions for data entry.

Furthermore, within the CRO EPR project, employees responsible for EPR tasks in MEPGT /Institute, as well as competent bodies for EPR tasks (counties and the City of Zagreb) – CAs, participated in numerous workshops where they took over the practice and knowledge of colleagues from Austrian and German agencies. Quality control and validation have been further expanded with new parameters and internal Instructions for implementing quality control have been developed in order to implement the above as efficiently as possible.

Quality control and further validation are carried out according to the principles of reviewing and comparing data in several ways; data for the same obligated party are compared by year, data sets are compared by similar groups of activities, capacities, types and groups of pollutants, then data are compared with data collected under other obligations for waste, air, climate change (LRTAP, ETS, Waste Shipment Regulation, etc.). In the case of significant deviations (more than 20 %, but also according to the experience and assessment of experts), they are referred to the competent authorities. Quality control forms created for the above purposes are incorporated into the EPR database. The competent authorities then communicate with the obligated parties in order to clarify the reported data and possibly correct them. In the case of corrections, a new quality control and verification of the entered data are carried out.

Since the establishment of the EPR system in 2008, the quality and quantity of collected data have improved, which is the result of the synergy of the actions of the CAs, the Inspectorate, MEPGT/Institute and the obligated parties. Details of this can be found in the annual reports published by MEPGT/Institute in accordance with the Ordinance on Environmental Pollution register.

Article 11.

Describe the method(s) by which public access to the data contained in the register is ensured, taking into account the requirements of Article 11 (public access to information).

Answer:

Information on the EPR is available to the public free of charge via the MEPGT/Institute website. The website contains regularly updated information on the EPR system, legislation, frequently asked questions (FAQ), useful information, links, an updated directory of competent authorities, etc. Also, in accordance with the Ordinance on Environmental Pollution register, the Institute prepares a “Report on EPR data” for the previous calendar year by 1 October each year, which it publishes on its website. The deadline is moved two months earlier with Ordinance on Environmental Pollution register from 2015 because of waste reporting demands.

National reports, as well as those according to the EU and UNECE, can be found at the following link:

<http://www.haop.hr/hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri-2>

These are listed in the response to Article 8 (a) of this Report (p. 12).

The "EPR Browser can be found at the link: <http://roo-preglednik.azo.hr/> . The EPR Browser can also be accessed via the entrance to the EPR database.

By monitoring the statistics of visits to the EPR system, an increase in public interest in the mentioned topic has been observed.

In the period from 01/03/2010 to 03/07/2022 the total average annual number of visits to the EPR database amounted to approximately 51,987 visits, with 608,905 pages opened. The average duration of the visit was 17:02 minutes. The website bounce rate was 21.4 % (belongs to "excellent"). In the period from 26.10.2013. until 07/03/2020, the EPR browser, the total average annual number of visits was 3,208

visits, and 6,105 pages were viewed. The average duration of the visit was 1:44 minutes. Bounce rate was 52.8 % (belongs to "about average").

The countries with the most data views are: Croatia (61 %), Great Britain (12.6 %), United States (5.5%), Germany (1.5 %), Japan (1.2 %), Serbia (0.95 %), India and Russia (0.86 %), Bosnia and Herzegovina (0.69 %) and 39 other countries around the world.

Since 2008, the EPR Help Desk has been established and is operating, enabling responses to inquiries from the public, competent authorities, industry, other institutions, etc. via the "Request for Information" form by e-mail or by telephone. The Help Desk is staffed by experts responsible for EPR - related tasks as professional and technical assistance to users of the EPR system. Among them are primarily CAs and data providers, but also employees of cooperating Ministries and institutions who have been assigned a user account for searching EPR data upon request. The above-mentioned tasks improve this type of work, and the necessary information is available to the public in a better quality and more user-friendly way.

In 2024, in the area of EPR Helpdesk, in the part of user account administration and general forms for the operator and for the facility (two forms), more than 600 telephone inquiries were answered, 887 requests for new user accounts for taxpayers and 17 requests for new user accounts for competent authorities and inspection.

In general, the pressure on EPR Helpdesk employees is greatest in the first six months of the year, when data entry by taxpayers and quality control and verification by the NT take place, and the above results in numerous data corrections. Thus, the average daily number of inquiries is around 50 - 70 (per employee), and the most pronounced are inquiries for the waste area. In total, four employees work at the EPR Helpdesk. In order to achieve better quality and completeness of data, the Ministry of Education and Culture requested an additional check of certain reported data for 2023 (in 2024), and according to NT, 198 forms were sent for data quality control only in the part of administration and general forms.

Since its establishment, the EPR Helpdesk employees (MEPGT/Institute) have responded to an average of around 3,000 inquiries per year by e-mail and telephone.

During 2013, the Industry Helpdesk (IHD) application was additionally developed with the aim of further improving cooperation and providing assistance to data providers, competent authorities and other interested institutions, and IHD inquiries are responded to by employees performing EPR tasks and competent authorities. Within the mentioned application, certain topics are informatively reinforced in terms of faster and more efficient answers. The application covers not only EPR, but also other databases relevant to sectoral pressures: databases related to the Seveso Directive and IPPC (environmental permits), noise and energy. The most inquiries come precisely for EPR, where in the period from 2015 to May 2020, about 4441 inquiries for EPR were received. The application was updated during 2023. In 2024, more than 1,000 emails were answered within the IHD.

In addition to the above, in accordance with the Law on the right to access to information ("Official Gazette", No. 25/13, 85/15, 69/22), formerly EPA, CAEN, MESD and today MEPGT have an Information Service that receives requests from citizens, the public and interested public, and taxpayers. Requests can be received via email: Pristup.Informacijama@mingor.hr or via the regular MEPGT email.

The aforementioned methods of public access to data within the EPR are based on the above-mentioned Law on the Right to Access to Information ("Official Gazette", No. 25/13, 85/15, 69/22), which regulates the right to access to information in ownership by public authorities and prescribes the principles of the right to access, exceptions to the right to access, and the procedure for exercising and protecting the right to access information. Also important is the EPA, which contains provisions on the right to access environmental information, on obligations to publish information on the environment, on deadlines for providing information, on the rejection of requests, which are in accordance with the provisions of the Aarhus Convention.

Article 12

Where information on the register is considered confidential, please indicate the types of information that may be withheld and the frequency of such withholding, taking into account the requirements of Article 12 (confidentiality). Please provide comments on practical experiences and challenges related to requests for confidentiality, in particular with regard to the requirements of paragraph 2.

Answer:

The availability of environmental data is regulated by the EPA - Environmental Protection Act. Article 158, paragraph (4) states that “A public authority holding environmental information may not refuse a request for information referred to in paragraph 3, subparagraphs 1, 4, 5, 6 and 7 of this Article, if that request relates to discharges or other emissions into the environment.”

Confidentiality of data is also defined in the Data Confidentiality Act (Official Gazette No. 79/07; 86/12) and its implementing acts.

In accordance with the Ordinance on Environmental Protection Registry, the right to data confidentiality is prescribed in III. Obligations and method of data delivery, Article 12 and Chapter V. Deadline and method of public notification, Article 23.

The confidentiality of data in the EPR database is entered by the taxpayers in the PI-2 form, item 7, where it is possible to select data in the forms that the taxpayer decides are confidential. Furthermore, in item 7.2, the claim about the confidentiality of data must be supported by documentation. In accordance with the Ordinance on Environmental Pollution register and based on the review of the submitted confidentiality documents, the CAs approves the confidentiality request.

According to previous practice, less than 1 % of taxpayers (operators) have requested confidentiality of data (2015 - 0.15 %; in 2021, data confidentiality was requested by five operators for five organizational units, and in 2022, 2023 and 2024, five requests from operators for seven organizational units). These were mainly state-owned companies and institutions, and a smaller number of private companies. The requests for confidentiality of data from these taxpayers mainly relate to data on the company's structure, number of people and physical location (state-owned companies and institutions), while private companies requested confidentiality of production capacity and technology (business secret).

Within the EPR system, multiple user levels of data viewing have been defined, in such a way that confidentially marked data is visible only to CAs employees responsible for performing EPR tasks, the Environmental Protection Inspectorate of the State Inspectorate of the Republic of Croatia, and employees of the Institute responsible for performing EPR tasks.

Article 13

Describe the possibilities for public participation in the development of the national PRTR system in accordance with Article 13 (public participation in the development of national pollutant release and transfer registers) and any relevant experience related to public participation in the development of the system.

Answer:

In 2009, the Government of the Republic of Croatia adopted the Code of Conduct for Consultation with the Interested Public in the Procedures for Adopting Laws, Other Regulations and Acts (Official Gazette, No. 140/09), which also includes Guidelines for the Application of the Code. However, the general legal framework for public consultation is defined by the Act on the Right to Access Information (Official Gazette, Nos. 25/13, 85/15, 69/22), while public consultation for state administration bodies is also prescribed by the Act on Better Regulation Policy Instruments (Official Gazette, No. 155/23).

In accordance with these regulations, the drafts of the EPR Ordinance were published in the public consultation section on the national website for a period of one month, during which the public was able to provide comments and objections, and a public hearing was held. The draft of the EPR Ordinance from

2022 was published in e-Consultation for a period of one month. All comments have been processed in accordance with the prescribed legal procedure.

Link: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=17389>

Article 14

Describe the procedure established by law according to which every person has the right to appeal if he/she considers that his/her request for information has been ignored, unfoundedly rejected or has not been resolved in accordance with the provisions of Article 14 (access to justice) and its application.

Answer:

According to Articles 25 and 26 of the Right to Access Information Act (Official Gazette No. 25/13, 25/15, 69/22):

Article 25

(1) An appeal may be filed with the Commissioner against a decision of a public authority within 15 days from the date of delivery of the decision.

(2) An appeal may also be filed when the public authority fails to decide on the applicant's request within the prescribed period.

(3) The Commissioner is obliged to issue a decision on the appeal and deliver it to the party, through the first-instance body, no later than 30 days from the date of submission of the proper appeal.

(4) Public authorities are obliged to provide the Commissioner with access to the information that is the subject of the procedure in the appeal procedure against the decision on the restriction of information referred to in Article 15, paragraphs 2 and 3 of this Act. For information referred to in Article 15, paragraph 2, item 1 of this Act, the Commissioner shall request the opinion of the Office of the National Security Council, in accordance with the law governing the confidentiality of data.

(5) When the Commissioner, in the appeal procedure, needs to examine the correctness of the proportionality and public interest test, or to conduct a proportionality and public interest test, he shall issue a decision on the appeal and deliver it to the party, through the first-instance body, no later than 60 days from the date of submission of the regular appeal.

(6) When the Commissioner, for information referred to in Article 15, paragraph 2, item 1 of this Act, requests the opinion of the Office of the National Security Council, he shall issue a decision and deliver it to the party, through the first-instance body, no later than 90 days from the date of submission of the regular appeal.

(7) When the Commissioner determines that the appeal is well-founded, the Commissioner shall order the public authority by decision to provide the user with access to the requested information, or to decide on the user's request, and shall set an appropriate deadline within which it is obliged to do so.

(8) A public authority shall be deemed to have prevented or restricted access to information to a user if it fails to act in accordance with the Commissioner's decision referred to in paragraph 7 of this Article or fails to do so within the deadline set by the Commissioner.

Article 26 - Administrative dispute

(1) An appeal shall not be permitted against the Commissioner's decision, but an administrative dispute may be initiated before the High Administrative Court of the Republic of Croatia. The High Administrative Court of the Republic of Croatia must issue a decision on the appeal within 90 days. The appeal has a suspensive effect if the decision provides access to the information.

(2) An administrative dispute against the decision referred to in paragraph 1 of this Article may also be initiated by the public authority that issued the first-instance decision.

(3) In a lawsuit proceeding, public authorities are obliged to provide the High Administrative Court of the Republic of Croatia with access to the information referred to in Article 15, paragraphs 2 and 3 of this Act, which are the subject of the proceedings.

Article 15

Describe how the Party has promoted public awareness of the national PRTR and provide details, in accordance with Article 15 (training), on:

a) efforts made to ensure adequate training and guidance to assist competent authorities in carrying out their obligations under the Protocol;

Answer:

Immediately after the publication of the 2008 Ordinance on EPR, a EPR section was created on the website of the then CEA, through which all necessary information and content related to the national register was continuously provided to the professional and other interested public. The section is regularly updated.

Link:

<http://www.haop.hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri-6>

Over the years, with regular updates, new modules have been added to the section: video instructions to help taxpayers enter data into the EPR database forms themselves, and video instructions for users of the public EPR Viewer. Link: <https://www.haop.hr/hr/video-upute-roo/video-upute-roo>

In accordance with then Art. 21 of the Ordinance on EPR, the former CEA also developed the EPR Manual (in 2009), which was published within the section. During the CRO EPR project, as one of the project results, a new Air Manual was developed - for E-PRTR obliged entities (2017), which is available at the link: https://www.haop.hr/sites/default/files/uploads/dokumenti/022_reg_oneciscivaca/ROO/Prirucnik_izracun_emisija_zrak_E_PRTR.pdf

During 2022-2023, the Industry Helpdesk application was upgraded to help obliged entities with multiple databases, including EPR, and to provide answers to the public. Link: <https://www.haop.hr/hr/baze-i-portali/industrija-helpdesk>

All questions, comments and suggestions from public institutions, competent bodies, obliged entities and the public, received via the EPR Helpdesk or in some other way (by phone, via the Industry Helpdesk, at workshops, etc.) are processed and stored, and the Institute publishes these via the Helpdesk and its website and provides answers to them. This additionally provides ongoing assistance and coordination regarding data delivery and improvement of their quality.

Within the framework of planned activities and within organized visits through certain projects, the employees of the Institute visit the facilities where they become acquainted with the technologies of the facilities, and additionally, establish a dialogue with the industry.

News from 2021 are also video instructions for correctly entering data into each individual form. Link:

<https://www.haop.hr/hr/video-upute-roo/video-upute-roo>

The link: <https://www.haop.hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-pritisci/postrojenja-i-registri-6> also contains all laws, regulations, ordinances, documents, manuals and instructions to help with data entry and data quality control. The above is also sent to counties via email every year, every week (once per week) until the deadline for reporting data so that they can send it to taxpayers.

During 2024, a training workshop for CAs was planned, in accordance with the obligations from Article 21 of the EPR Ordinance and in accordance with the Chemicals Action Plan developed within the process of accession of the Republic of Croatia to the OECD. The aforementioned AP also includes other activities in the field of the national PRTR aimed at strengthening it. In addition to hiring new staff at the

MEPGT Institute who will work on quality control of data reported to the EPR database, and their training, the plan is to revise the EPR Manual, conduct expert visits to facilities for the purpose of training, and improve the connection and cooperation of all involved CAs: counties, ministries and the SIRC. The study visits and workshop was held in October-December 2024. Also, as a result of one activity in the Chemicals Action Plan, new Instructions for entering data for operators are on the website. Link: <https://www.haop.hr/hr/upute-roo/upute-roo>

- (b) assistance and guidance regarding public access to the national register and the use of the information contained therein.**

Answer:

All information related to EPR is available to the public via the link: <http://www.haop.hr/tematska-podrucja/otpad-registri-oneciscavanja-i-ostali-sektorski-priteisci/postrojenja-i-registri-6> (explained in details in the previous question – (a)).

The page contains regularly updated information about the EPR system, legislation, frequently asked questions (FAQ), useful information, links, updated address book of competent authorities, etc.

All the above information is also available at the entrance to the EPR database before entering it, and then at the entrance to the database through the user account, taxpayers have additional instructions and help for filling in the data correctly. In the forms themselves, help is provided through drop-down menus, the impossibility of entering incorrect data where possible, as well as "bubbles" with instructions on how to fill in each field correctly. There is also a mandatory field, i.e. in the fields where data must be entered, functionalities have been built in such a way that the forms cannot be saved if the specified mandatory data is missing.

Following the public launch of the CNPEPR, which was covered by the media (now an integral part of the ENVI portal), the Office regularly updates the available information about the portal on its website.

More information on access to the public and taxpayers to the EPR system is provided in the answers on pages 4, 6, 10 and 19 (a) of this Report (Articles 3, 4, 5, 11 and 15).

Article 16

Describe how the Party has cooperated with and assisted other Parties and promoted cooperation among relevant international organizations, in particular:

- (a) in the framework of international measures implemented to achieve the objectives of this Protocol in accordance with paragraph 1(a);**
- (b) on the basis of mutual agreements between Parties regarding the establishment of national systems required by this Protocol in accordance with paragraph 1(b);**
- (c) in sharing information required by this Protocol regarding releases and transboundary transfers in accordance with paragraph 1(c);**
- (d) in sharing information among Parties to the Protocol regarding transfers in accordance with paragraph 1(d);**
- (e) in providing technical assistance to developing country Parties and Parties with economies in transition regarding this Protocol in accordance with paragraph 2(c).**

Answer (a), (b), (c), (d):

The Republic of Croatia regularly cooperates with other Parties to the Protocol and EU Member States in meetings, workshops and through personal contacts. Information on the establishment of the CNPEPR has been sent to the PRTR Secretariat, the European Environment Agency and other regional partners (in 2019). International projects are described on page 4 of this Report.

Please provide other comments relevant to the implementation of the Protocol by the Parties or to the preparation of the implementation of the Protocol by the Signatories. Please provide any challenges or obstacles that you have encountered, as Parties or Signatories, in the process of establishing the registry, collecting data and entering data into the registry

Answer:

In the implementation of the PRTR, the greatest challenge was the establishment and development of the system and coordination of the EPR tasks of all involved entities and the quality involvement of the public. Following the entry into force of the new Ordinance on Environmental Pollution register, it was a challenge for operators and CAs to master the accurate reporting of data and learn the procedures for quality control and validation thereof.

The quality of the submitted data and their quality control remain among the priorities of the coordination and management of the EPR system. Further organization of workshops, coordination meetings and provision of expert assistance (e.g. via a help desk) are of great importance for the quality management and transparency of the system.

Obligors, operators and organizational units are responsible for the quality and quantity of the data themselves. CAs, in cooperation with the competent inspection, are responsible for checking the completeness, accuracy and credibility of the data. In this area, cooperation between CAs and obliged entities is crucial. Also, the problem that arises here is the lack of human capacity in the CAs themselves, the inspection and the Institute. The above is not easy to achieve because it also depends on the capabilities and economic situation of the country.

A particularly big challenge was the construction of applications for the implementation of reporting obligations according to the then new reporting obligation of the EU Registry EC. The above required the collection in one place and the harmonisation of data sets from several databases and applications, the EPR and RPOT/OPVN databases (Seveso data), large combustion plants, waste co-incineration, ETS obliged entities and obliged entities to submit data on volatile organic compounds, and often the data provided was not fully harmonised. In addition to the above, it was also necessary to add data from other institutions, specifically the SIRC on the number of inspections carried out and to design new data, such as the ID code for each individual location, facility, plant and part of the plant. The above was initially entered manually, but later the system was modernised and is now fully automated. Regardless of the initial challenges, the Republic of Croatia duly and timely fulfilled all obligations.

Although there has been a significant improvement in the comparability and harmonization of data submitted by Parties (thanks also to the efforts of the EU, UNECE, OECD, etc.), further continuous progress is necessary to achieve better harmonization of data at the global level. This can only be achieved through continuous and quality exchange of information between the CAs, all institutions involved, the reporting entities themselves and the public.

We are aware that this is extremely difficult to produce due to the diversity of countries and industries. Alternatives need to be found, including comparative tables between different methods/methodologies used for industrial activities/pollutants or, for example, geographical areas. UN and EU working groups and expert groups can provide their expert input to this process.

Information exchange between industry and competent authorities, as well as the various competent authorities, stakeholders in the process, is of crucial importance, not only to improve process validation but also to optimize the environmental aspect of the industry.

In order to remove obstacles for the further successful implementation of the Protocol, we believe that it would be beneficial for the Parties to further strengthen the following existing activities:

- ensuring the flow of information and technical assistance between the Parties, in the part of the construction of the initial PRTR systems for data collection and the establishment of data collection and quality control.
- promoting bilateral cooperation between the Parties in which PRTR has been successfully implemented and those that need assistance.
- support to the PRTR Secretariat in organizing workshops, trainings and regional meetings with the participation of various experts, including IT experts. In the coming period, the mentioned support should be especially strengthened with regard to the new joint reporting related to the PRTR and LCP data and data from the EK EU Registry database, as well as to the new Regulation and the new IED directive, as well as the new reporting format.

Annex I. List of activities (additionally elaborated activities in the Ordinance on Environmental Pollution register):

03 03 09 Offshore activities (platforms)

11 OTHER ACTIVITIES

11 01 00 Use of solvents and other products

11 01 01 Use of paints and varnishes

11 01 02 Production of vehicles (serial painting and drying)

11 01 03 Repair of vehicles (non-serial painting and drying)

11 01 04 Dewaxing of vehicles

11 01 05 Other industrial applications of paints and varnishes

11 01 06 Other non-industrial applications of paints and varnishes

11 01 07 Application of glues and adhesives

11 01 08 Textile finishing

11 01 09 Leather finishing

11 01 10 Leather tanning

11 02 00 Production of electronic components

11 02 01 Metal coating in the electronics industry

11 02 02 Manufacture of household appliances

11 02 03 Manufacture of wires and cables

11 02 04 Manufacture of lighting

11 02 05 Manufacture of accumulators and/or batteries

11 03 00 Printing industry

11 03 01 Printing industry

11 03 02 Co-incineration of waste fumes - gases (e.g. printing industry)

11 03 03 Printing of colours on Al foil

11 04 00 Construction and shipbuilding

11 04 01 Construction

11 04 02 Shipbuilding

11 04 03 Treatment and protection of the lower parts of vessels at sea

11 05 00 Other sources of emissions

11 05 01 Manufacture of railway sleepers

11 05 02 Production of carbon black

11 05 03 Graphite production

11 06 00 Maintenance and cleaning

11 06 01 Degreasing, dry cleaning and production of electrical equipment

11 06 02 Degreasing of metals

11 06 03 Dry cleaning

11 06 04 Other industrial cleaning

11 06 05 Building maintenance

11 06 06 Maintenance of buildings and installations

11 06 07 Demolition of buildings

11 06 08 Clean-up of contaminated sites

11 06 09 Maintenance and repair of vehicles, vessels, equipment and equipment

11 06 10 Vehicle and vessel servicing

11 06 11 Maintenance and repair of traction vehicles

11 06 12 Maintenance and repair of wagons

11 06 13 Maintenance of signalling and safety devices

11 06 14 Maintenance of telecommunications devices

11 06 15 Maintenance of electrical and electronic equipment

11 06 16 Maintenance of energy equipment and devices

11 06 17 Maintenance and repair of aircraft

11 07 00 Storage, distribution, transport, manipulation

11 07 01 Storage and handling of chemical products

11 07 02 Storage and handling of inorganic chemical products

11 07 03 Storage of solid fuels

11 07 04 Distribution of liquid fuels (except petrol)

11 07 05 Terminals in marinas (tankers, handling and storage)

11 07 06 Other handling and storage (including pipelines)

11 07 07 Distribution of petrol
11 07 08 Refinery dispatching stations
11 07 09 Petrol stations (including vehicle fuelling)
11 07 10 Gas distribution networks
11 07 11 Gas pipelines
11 07 12 Distribution networks
11 07 13 Storage and handling of other chemical products
11 07 14 Storage and handling of goods, retail trade
11 07 15 Storage and handling of goods, wholesale trade
11 07 16 Storage and handling of wood products
11 07 17 Storage and handling of metal products
11 07 18 Storage and handling of plastic products
11 07 19 Storage and handling of textile products
11 07 20 Other storage and handling of goods (products)
11 08 00 Protection of human and animal health
11 08 01 Treatment of humans
11 08 02 Treatment of animals
11 08 03 Laboratory work (handling chemicals)
11 08 04 Blood processing
11 08 05 Recovery/disposal of expired medicines

