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#### **'I/A' ITEM NOTE**

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From: General Secretariat of the Council  
To: Permanent Representatives Committee/Council

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Subject: Draft REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the alignment of reporting obligations in the field of legislation related to the environment, and amending Regulations (EC) No 166/2006 and (EU) No 995/2010 of the European Parliament and of the Council, Directives 2002/49/EC, 2004/35/EC, 2007/2/EC, 2009/147/EC and 2010/63/EU of the European Parliament and of the Council, Council Regulations (EC) No 338/97 and (EC) No 2173/2005, and Council Directive 86/278/EEC **(first reading)**

- Adoption of the legislative act
- Statement

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#### **Statement by the Slovak Republic**

The Slovak Republic welcomes and fully supports initiatives and efforts with respect to modernize and streamline the reporting processes including initiatives to synchronize reporting periods and to avoid double reporting.

The result should be better quality information that is provided more easily and is more widely used. This will benefit everybody involved or interested in environmental reporting.

Administrations will benefit through reduced administrative burden. The burden for business will be reduced if Member State administrations pass on the efficiency gains where businesses are involved in reporting and regulatory monitoring. Policy makers will have better quality information for policy development. Last but not least, the European public, businesses and administrations will have better access to better environmental information.

However, shortening the reporting period from 15 to 11 months in art. 7 on EPRTR will likely have a negative impact on the quality and complexity of the reported data and therefore above-mentioned goals would not be reached. Competent authorities of the Member States have quantity of task to do at first to assess the quality of the data; whether the information provided by the individual facilities is satisfactory with respect to its completeness, consistency and credibility.

In the case of any discrepancies, uncertainties or doubts in respect of the information provided by facilities, the competent authority of the Member State will have to ask for clarification from the facility concerned. The facility could also be asked to amend the information supplied if appropriate. This includes examination by the competent authorities of the records held by operators, including the data from which the reported information was derived and the description of the methodology used for data gathering. Therefore, any shortening of the deadline would be at the expense of the quality and complexity of the data.

Furthermore, we wish to express our concern in relation to recital 11 on EPRTR which states that: "Member States make data publicly available as fast as technically feasible with the aim of having the information available within three months of the year end.". The Slovak Republic does not have the possibility to technically provide the flow of data from the operator to the state and the subsequent processing of data within 3 months and that period is for us unrealistic. We are of the view that this period is only aspirational and voluntary in each country.

A longer period of time will allow the Slovak Republic to have a better and more comprehensive collection of data for publication purposes for citizens.