



Status of Comparability Among the Pollutant Release and Transfer Registers (PRTRs) in North America

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Since the first CEC report on the North American Pollutant Release and Transfer Register (PRTR) systems (*Putting the Pieces Together*, 1996), officials from the three North American countries have been exchanging information and working together to increase the comparability of the PRTR data collected in North America. This longstanding policy commitment to PRTR reporting and to increasing comparability among the three systems regionally has provided a forum for interaction and exchange of experience among the three countries and has contributed to improvements in, and increased comparability among, the national systems.

The three countries' PRTRs are the United States' *Toxics Release Inventory* (TRI), reporting since 1987; the Canadian *National Pollutant Release Inventory* (NPRI), reporting since 1993; and the Mexican *Registro de Emisiones y Transferencia de Contaminantes* (RETC), beginning with a pilot project conducted in 1996 and more recently based on Section V of the *Cédula de Operación Anual* (COA), with voluntary reporting since 1998.

In June 1997, the CEC Council, comprised of the top environmental officials in the three North American countries, signed Council Resolution 97-04: Promoting Comparability of Pollutant Release and Transfer Registers (PRTRs). In part, the Council agreed to develop an implementation plan to enhance the comparability of North American PRTRs and noted that the plan should include short-term and long-term goals. The aim is to increase the amount of data available on a continent-wide basis, in order to gain a more complete picture of the sources, quantities and handling of pollutant releases and transfers in North America.

While recognizing that individual countries will design PRTRs to meet their own needs and capacities, Council Resolution 00-07, passed in June 2000, sets forth a set of basic elements considered central to the effectiveness of PRTR systems. It also reaffirmed the Council's commitment to publishing the CEC's annual report on pollutant releases and transfers in North America (the *Taking Stock* report) based on information collected through the national PRTR programs. In May 2002, the CEC published the sixth in the *Taking Stock* series on pollutant releases and transfers in North America. Currently, the report covers data from Canada and the United States, and will include Mexico as comparable data become available.

This North American experience in putting together PRTR data from neighboring countries is gaining increasing attention internationally as a model for providing information on toxic chemical releases and transfers to citizens and communities and other users of the data.

Some of the basic elements of a PRTR are already incorporated into the three countries' PRTR systems: reporting on individual substances (chemicals); facility-specific reporting; multi-media reporting; and periodic (annual) reporting. Since the countries began collaborating in the context of the CEC PRTR project, a number of steps have been taken by the US and Canada that increase the comparability of their respective systems, including reporting of off-site transfers by individual transfer site (NPRI, 1996 reporting year), reporting of pollution prevention activities (NPRI, 1997 reporting year), reporting by additional industry sectors (TRI, 1998 reporting year), mandatory reporting of transfers to recycling and energy recovery (NPRI, 1998 reporting year), expansion of chemical list (NPRI, 1999 reporting year), addition of persistent bioaccumulative toxic (PBT) chemicals (NPRI and TRI, 2000 reporting year), and modification of pollution prevention reporting (NPRI categories expanded for 2002 reporting year, are now comparable with TRI). Such steps have increased in general the amount of releases and transfers included in North American PRTR data from about 40 percent to about 60 percent.

Mexico took an important step forward in December 2001 with the passage of enabling legislation for the development of a mandatory and publicly accessible PRTR. The process of development and review of regulations to implement the mandatory system has begun. This stage in the development of the Mexican PRTR is a good opportunity to review and enhance the comparability of all three countries' PRTRs.

In addition, although particular elements may exist in all three PRTRs, how they are implemented affect whether or not the data are comparable across the three countries. The following table highlights particular elements of the three nation's PRTRs that are not comparable or that match in some respects but not others. Each of these areas needs to be made more comparable if comparative analysis of North American PRTRs is to be fully achieved.

Status of Comparability Among the National PRTR Programs in North America (as of 2000 reporting year)

Element	US TRI	Canadian NPRI	Mexican RETC	Status of comparability
Industry sectors	Manufacturing industries and selected "upstream" and "downstream" industries, e.g. electricity, hazardous waste management	All facilities, with some exceptions	Facilities under federal jurisdiction (may be extended to facilities under state jurisdiction)	Metal mining does not match (TRI-NPRI); RETC does not cover mining, food products, textiles, apparel, leather, lumber and wood, instruments; also may not include all facilities in machinery, electronics
Industry classification codes	Facilities report US SIC codes	Facilities report Canadian SIC, US SIC and NAICS codes	One CMAP code per facility	Common industry codes are essential to matching as long as only certain industries are covered; need for TRI and RETC to adopt NAICS
List of chemicals	612 chemicals and 28 chemical categories	268 chemicals	104 chemicals	55 chemicals match among all 3 systems; 210 match NPRI-TRI
Reporting thresholds	Manufacture, process or use (MPU) approach	Manufacture, process or use (MPU) approach; some release/transfer based thresholds	Based on amount of on-site releases, differ by category of substance	RETC not comparable. NPRI-TRI comparable for those with MPU thresholds
PBT chemicals	6 chemicals added; reporting thresholds lowered for 11 chemicals (All MPU thresholds)	23 chemicals added; some with "release/transfer" threshold; 1 with lowered MPU threshold	None added. Thresholds based on "on-site releases"	Generally not comparable because thresholds don't match; also list of chemicals don't match
Criteria air contaminants	Not on TRI	Added to NPRI for 2002 reporting year	Mandatory in Section 2 of COA	Not comparable
Accidental spills	Included in on-site releases and off-site transfers	Reported separately in on-site release, included in off-site transfer	Reported as single amount, not differentiated by media. The amount is not included in release, transfer totals	Releases and transfers as reported by RETC not comparable; NPRI, TRI are comparable

Element	US TRI	Canadian NPRI	Mexican RETC	Status of comparability
Identity of off-site transfer locations	Name, address, permit number	Name and address	Permit number or name	Cannot identify where transfers are sent in RETC (necessary for cross-border analyses)
Amount of transfers by location and by type	Individual amounts of transfers reported by location and by type (e.g., disposal, recycling, treatment, sewage)	Individual amounts of transfers reported by location and by type (e.g., disposal, recycling, treatment, sewage)	One amount only for all transfers reported	Not comparable
Mandatory/voluntary	Mandatory	Mandatory	Voluntary (enabling legislation for mandatory system passed in December 2001)	Only mandatory data are comparable
Public access	Data on internet, summary report	Data on internet, summary report	Data not publicly available. Annual report summarizes number of reporters	Not comparable
Data confidentiality	For confidentiality claims, only chemical name is kept confidential	For confidentiality claims, the entire report and facility name are kept confidential	All data is kept confidential unless written permission to publish is provided by facility	Not comparable, except that number of claims small in NPRI and TRI

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