

**Juan Luis Martin Ortega**  
**Chair of the Compliance Committee under the Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters**

Madrid, 09 February 2024

Dear Ms. Torcato,

You may recall that the Compliance Committee, at its twelfth meeting (1 March 2022), considered the issue of national pollutant release and transfer registers in the European Union member States.

Pursuant to information provided by Portugal in its 2021 National implementation report, the Committee had send questions to the Party concerned regarding the implementation of the Protocol on Pollutant Release and Transfer Registers in order to clarify the matter further, and received the respective response from the Party concerned. This correspondence has been made available on the Committee's webpage, see: <https://unece.org/env/pp/protocol-on-prtrs/protocol-bodies/cc/advice-or-assistance-Portugal>.

The Committee, noting several issues of potential non-compliance, but at the same time observing a number of measures that the Party concerned is currently implementing or planning to implement, pursuant to paras 14 (b), 40 (a) and 40 (e) of the annex to Decision I/2 (ECE/MP.PRTR/2010/2/Add.1), the Committee agreed to provide the Party concerned with advice as to facilitate assistance regarding its compliance with the Protocol.

Please find enclosed the Considerations and Advice prepared by the Committee for your attention. The Committee would be grateful to receive a comprehensive report on implementing measures by 31 January 2025. Please send the report to [prtr.survey@un.org](mailto:prtr.survey@un.org) and do not hesitate to contact the secretariat if you have any questions regarding the above.

Yours sincerely,



Juan Luis Martin Ortega

Enc.: Considerations and advice by the Compliance Committee

Ms. Teresa Torcato  
Portuguese Environment Agency (APA)  
Ministry of the Environment, Territory Management and Energy  
Portugal

## Slovenia

### Considerations and advice by the Compliance Committee (PRTRCC/A/2022/5)

All answers and additional information received from Slovenia were assessed. Results of the assessment are grouped by specific issues and corresponding articles of the Protocol, and are accompanied by relevant advice.

#### **A. Considerations**

##### **I. National PRTR (article 3(1) and 4)**

1. In its answers the Party explained that, as it is indicated in its 2021 National Implementation Report, Slovenia does not have a national PRTR that would fully meet the obligations under the Protocol. Currently information on emissions and transfer of pollutants from Slovenian companies is available through the EEA European Industrial Emissions Portal: <https://industry.eea.europa.eu/#/home> only.

2. Slovenia has a dedicated E-PRTR web page on its “Central government website for easy access to comprehensive information on the organisation and functioning of the state administration” (<https://www.gov.si/zbirke/storitve/porocanje-v-evropski-register-izpustov-in-prenosov-onesnazeval-e-ripo/>) which contains relevant legislation and instructions for local companies on how to submit E-PRTR report to the competent authority. However, Slovenia stated that it intends to fully implement the provisions of the Protocol on PRTRs. It had adopted a new Environmental Protection Act – The Law on Environmental Protection (ZVO-2, Official Gazette of the Republic of Slovenia, No. 44/22), and its article 155(4) provides that environmental information system should be in line with the accepted international agreements and should include PRTRs.

3. Furthermore, the Party stated that the provisions of the Protocol on PRTRs will be met through integration of a new to-be-established (web-based) PRTR portal into a wider national information system. Slovenia already started the project entitled GreenSLO4D, funded from the recovery fund NextGenerationEU, which includes an element on developing of the information system to manage data and on delivering the PRTR portal open to the public. The information system to support the data flow (IS monitoring) will be built by the beginning of 2026. The system will combine data from permitting process with data which is reported by E-PRTR facilities and other facilities and installations. At the same time, the renovation of the Slovenian Environmental Agency website will be co-financed from the same project and should be completed by the beginning of 2025, allowing Slovenia to publish the national PRTR portal (make it visible to external users/available online to the public) already then.

4. Thus, the Party plans to establish a national PRTR portal on a dedicated web page of the competent authority within the project on renovation of the Slovenian Environmental Agency website.

*(See answers to Questions 1 and 2 as well as relevant information in other answers)*

##### **II. Language (articles 3(1), 4(h), 5(1) and 11; also relevant for articles 13, 14 and 15)**

5. Slovenia has stated that it will establish a new web-based national PRTR portal in Slovenian language and will ensure that PRTR data will be publicly accessible in Slovenian language too thereby meeting the requirements of the Protocol on PRTRs.

6. The Party explained that currently the public access to national PRTR data from facilities in Slovenia through electronics means is available in English language through the European Industrial Emissions Portal: <https://industry.eea.europa.eu/#/home>. A link to the European Portal is available on the website of the competent authority together with explanations in Slovenian language about the search options for data on national releases and transfers.

7. On a dedicated web page of the competent authority there is link to the EEA European Industrial Emissions Portal together with explanations in Slovenian language about searching possibilities of national releases and transfers. In addition, public access by any other means, in line with article 11(2) and 11(3), is provided by the competent authority in Slovenian language. Thus, the Competent authority also provides access to the PRTR data, in Slovenian language, through other means and the authority's webpage provides information on those means. This includes access upon request, which is answered as soon as possible through any other means, not by direct electronic means. In addition, locations of SEVESO facilities, IED facilities, waste water releases from industrial plants and information on landfills is accessible in Slovenian language through the environmental atlas: [http://gis.arso.gov.si/atlasokolja/profile.aspx?id=Atlas\\_Okolja\\_AXL](http://gis.arso.gov.si/atlasokolja/profile.aspx?id=Atlas_Okolja_AXL) .

*(See answers to Questions 2, 5, 7 and 8)*

### **III. Search function (article 5 (1))**

8. The Party confirmed that PRTR data from Slovenia is searchable through the E-PRTR via EEA European Industrial Emissions Portal. The Party also explained that it will establish a national PRTR portal on a dedicated web page of the competent authority within the project on renovation of the Slovenian Environmental Agency website. The data will be presented with the possibility to search and identify releases and transfers as required by the Protocol's article 5.1, and the search functions are planned to be available in first quarter of 2025.

*(See answers to Questions 3, 4 and 5)*

### **IV. The register shall be designed for maximum ease of public access through electronic means, such as the Internet (article 5 (4))**

9. The Party explained that it currently does not have an information system designed to ease public access to PRTR data. The Party noted that it had started a project on building an information system that will support national PRTR portal and provided information on how public can access information through electronic means at present (see above sections).

*(See answer to Question 6 and relevant information in answers to Questions 2, 7 and 8)*

### **V. Access to information (articles 11 and 4(h))**

10. The Party explained that currently the public access to national PRTR data through electronics means is available in English language through the European Industrial Emissions Portal: <https://industry.eea.europa.eu/#/home>. On a dedicated web page of the competent authority there is link to the EEA European Industrial Emissions Portal together with explanations in Slovenian language about searching possibilities of national releases and

transfers. In addition, public access by any other means in line with article 11(2) and 11(3) is provided by the competent authority in Slovenian language.

11. Slovenia will establish a (new) web based national PRTR portal in Slovenian language, thereby ensuring that PRTR data will become publicly accessible in Slovenian language. Design and functionality of the national PRTR portal will take into account public needs gathered in dialogue with environmental NGOs.

*See also section II. Language*

*(See answers to the Questions 7 and 8 as well as relevant information in answers to Questions 2 and 6)*

## **VI. Public participation in the development of national pollutant release and transfer register (article 13)**

12. The Party explained that the "Council for Sustainable Development and Environmental Protection" was established through Article 234 of the Environmental Protection Act ((O.J, no. 44/22 and 18/23 – ZDU-1O), available at <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO8286>).

13. In accordance with Article 70 of the Environmental Protection Act, the Ministry responsible for environmental protection must, in the process of adopting regulations governing the environment, provide the public with the opportunity to become acquainted with the draft regulation and to give opinions and comments for a period of at least 30 days. In accordance with Article 234 of the Environmental Protection Act,<sup>1</sup> the Council for Sustainable Development and Environmental Protection participates in the formulation of environmental protection policies as a consultative body of the Minister responsible for environmental protection. The Council includes representatives of academic institutions, business and NGOs working in the field of the environment. The Party outlined that the draft national PRTR portal would be presented to the Council, and NGOs represented in the Council would be asked to invite other interested environmental NGOs to participate. The Party also stated that design and functionality of the national PRTR portal will take into account public needs gathered in dialogue with environmental NGOs.

*(See answers to the Questions 9 and 10)*

### **B. Advice**

- a) Establish "national release and transfer register" (PRTR portal) without any delay.
- b) Provide opportunities for effective public participation in development or modification of the PRTR portal.
- c) Ensure that the PRTR portal meets the requirements of the Protocol on PRTRs. This includes that: (i) the PRTR portal is designed to ease public access; (ii) the system which is used to disseminate PRTR data collected within Slovenia provides these data and other

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<sup>1</sup> Available at <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO8286>.

relevant information online in Slovenian language; (iii) the data in national language is easily searchable; and (iv) releases and transfers can be searched and identified as a minimum.

d) Ensure that, taken as a whole, the national pollutant release and transfer register, which may include elements of the E-PRTR, meets all requirements of the Protocol.

In addition, please consult the Committee's considerations regarding National pollutant release and transfer registers in the European Union member States, as provided in the 2021 Synthesis report on the status of implementation of the Protocol (paras. 237-244; ECE/MP.PRTR/2021/10).

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