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21/01/21

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Re: Public consultation on the implementation of the Pollutant Release and Transfer Registers in Ireland

To whom it may concern,

Irish Water welcomes the opportunity to submit views on Ireland's 2021 National Implementation Report for the Pollutant Release and Transfer Registers (PRTR) Protocol. Specifically, Irish Water wishes to comment on the following section of the proposed report.

Article 8

(b) The deadline(s) by which the owners or operators of facilities were required to report to the competent authority;

The deadline in the Irish PRTR Regulations (S.I. No. 123 of 2007) for PRTR reporting to the Irish EPA is 31st March annually. However, the deadline applied in the Waste Water Discharge Licenses issued to Irish Water is 28th February. This is considered to be a very challenging target to meet, as annual data may not be validated until the end of January. Irish Water would request the same deadline of the 31st of March be applied to UWWTD.

Yours sincerely,



