

**Perspectives of Environmental Non-Government Organizations (NGOs)
On the National Pollutant Release Inventory (NPRI) Public Outreach Programme
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Introduction

Canadians are deeply concerned about the amount of pollution that is occurring in their communities, the impact this pollution might have on their health and that of their children and its impact on the environment. One of the best sources of information that Canadians can use to try to find out about pollution and how it affects them, their children and their communities, is the National Pollutant Release Inventory (NPRI).

Since the 1990s the federal government has used the NPRI as a tool to provide citizens with basic information about the pollution being emitted by facilities. This shows a commitment by the federal government to Canadians' right to know about pollution in their communities. Since its establishment, the NPRI has continuously evolved to meet new information and priorities. Substances have been added and deleted. Requirements for reporting have changed. Throughout its evolution, Environmental Non-Government Organizations (ENGOS) have been pleased to be a part of the multi-stakeholder committee which has provided advice to Environment Canada (EC) on these changes.

This brief paper, following on from the June 2006 NPRI Working Group meeting, is intended to provide advice to Environment Canada, from an ENGO perspective, about what issues need to be addressed to further improve the NPRI and make more Canadians aware of its existence and what it can provide them. We conclude this report with our thoughts on next steps we feel Environment Canada should take regarding the NPRI program.

Main categories of concern with the NPRI:

- Data Quality – Reliability and confidence
 - **Legal requirements** – limitations for reporting to the NPRI under CEPA
 - **Gaps, discrepancies, and harmonization** within, amongst, and between other inventories

- Public Outreach:
 - **Awareness of Inventory:** Its function, different types of inventories
 - **User-friendliness of the inventory:** For all types of audiences ranging from public, occasional users to governments, industry and others. From a public perspective, searching for facility-specific or sector specific information is difficult and can be

onerous, defeating one of the main purposes of the inventory. For example, searching by codes is difficult as the codes themselves vary in how facilities are classified.

- **Coverage and context of information on the NPRI:** It is important that users understand what the NPRI covers and what it does not, for example, facility-based sources versus area sources, requirements for facilities to report (number of employees), range of substances, thresholds for reporting, exemptions.
- **Interpretation of Data:** For example, offer context as to thresholds and units (e.g., tonnes, kilograms, grams) for reporting; the completeness of the data; the source of the data – i.e., facility-specific; exemptions; the level of accuracy; and potential for double-counting.
- **Health Effects:** For example, for the substances reported to the NPRI, the health effects (potential, suspected and affirmed) should be assigned to these substances. E.g. carcinogenic, persistent and/or bio-accumulative, hormone mimickers, etc.

General Comments:

The NPRI, like other pollutant inventories, is not all-inclusive. Pollutant inventories report only a fraction of the quantity and range of pollutants released into the environment from specific industrial sources. However, by providing a quantitative aspect on the total pollutant burden, they provide the public with access to information that would not otherwise be readily available and serve as a catalyst for implementing environmental, health and safety protection.

Since their inception, pollutant inventories have evolved as a fundamental tool and reference for governments and the public in a variety of ways. They allow users to track the environmental performance of specific industries; raise public awareness; develop and assess air quality strategies; determine emission trends and projections; and provide input into air quality modeling. They are also used as a means of accountability as to whether Canada is meeting its obligations with respect to reductions of specific pollutants at a regional, national and international level.

For inventories to be a reliable resource of information for the multitude of applications, there have to be active public outreach programs and improvements to search mechanisms to suit the range of users. As well, it is important that the public have access to reliable data which they can interpret and analyze with reasonable confidence.

Data Quality:

Facilities use a variety of estimation methods to calculate and report their emissions to the NPRI. Emission factors and engineering estimates are the most common methods used to determine facility-level data. Other methods include source testing, continuous emission monitors (CEMs) and mass balance determinations, which likely represent an improvement over estimation factors.

The NPRI does not require facilities to expend any effort beyond what that they normally do for calculating emissions. Facilities are not required to measure the data submitted to the NPRI and only need to indicate what methodology was used to generate the data. The main source of data

has typically been emission factors which have inherent uncertainties that question their reliability.

The NPRI does not require or collect process level emissions and related information. [Process level data would include information such as consumption and production of materials, equipment capacity, emission control devices, and their efficiencies.] The lack of process level information makes it difficult to assess the completeness and accuracy of the reported emissions.

Furthermore, while Environment Canada reviews the data and may request re-calculation or further information where large discrepancies are noted, there is no verification or formal auditing system in place.

Major improvements for reporting to the NPRI are needed to improve the quality and quantity of information on the NPRI. These would include improvements on estimation methodology; the application of direct measurement and monitoring of emissions; consistent verification and auditing protocols; and the collection of necessary data elements such as specific process-level information. The use of emission factors deemed to be inaccurate should not be acceptable.

A reporting requirement for facilities needs to be developed to allow for the revision of historical emissions to resolve large data variations between different years and the incompleteness of the data.

New and improved reporting tools also need to be developed along with improved reporting guidance from Environment Canada.

The different requirements and coverage of other inventories reporting for the same substances (for example the Comprehensive Inventory on Criteria Air Contaminants (CACs) and the Dioxins and Furans Inventory) must be clearly explained. The reporting requirements for different programs (provincial, federal) need to be considered in terms of possible linkages and harmonization. Where the requirements of other inventories clearly point to collecting more detailed and/or specific information (such as process level information), these needs must not be sacrificed for harmonization.

Public Outreach:

While ENGOs applaud EC's NPRI website revision and support any effort to make it more user-friendly for both communities and industry, we caution against assuming that a revamped website can function as the primary source of information about matters of environmental importance – especially when these involve hard information about pollutants manufactured, produced or otherwise used in Canada. It is important for public information specialists to realize and acknowledge that many people do not have internet capacity and that many who do are not proficient in its use or have slow downloading capabilities.

EC should address this digital divide in its ongoing public information efforts by investment in other modes and media, including:

- Public information sessions using cable television and town hall format in communities at risk. EC should be proactive in identifying such communities.
- Providing hard data and information through regular newspaper updates and annual publication in local papers of all emissions reported by facilities within a defined region (perhaps a federal riding). Publication should not be left to chance – news releases are used at the discretion of an editor who might either not publish or edit information – therefore, paid advertisement is the only certain way of getting the exact message where it needs to go.
- Hard-copy publication and wide distribution of pamphlets or one-pagers on the uses of the inventory as well as on effects of specific toxic substances. These might be simply printouts of web pages and should be written in simple, straightforward language. The one-pagers should clearly answer some basic questions. For example:
 - Who is the emitter?
 - What are they emitting?
 - What are the effects on the environment and human health?
 - What are the cumulative effects of the release, either alone or in combination with other substances?
 - In what quantity and under what conditions does the substance begin to pose a serious hazard?
 - Who compiles the NPRI data?
 - Whom should concerned citizens contact in the case of suspected errors in data?
 - What penalties are polluters required to pay for violations or flagrant misreporting?
 - What are the avenues of redress available to communities whose environmental rights have been violated?
 - What resources are available for communities who wish to challenge a report?
 - Where is the facility located? (Include exact address and area of impact).
 - Where are the emissions going?
 - When should communities or individuals become concerned about the emission levels in their area?
 - When does the NPRI publish its data?
 - When are new substances added or others deleted?
 - Why are these toxic substances allowed to be released into the environment?
 - Why are some people more at risk than others?
 - How is the NPRI compiled?
 - How can individuals and communities use the NPRI data to prevent pollution and protect the environment and their health?

These are by no means the only questions people might have, but they provide a starting point.

As well, ENGOs support positive, proactive activities and events such as the idea of Top Ten nominations/awards for industries that have demonstrated substantial improvements in pollution prevention. However, in our view, it is imperative that such measures be strengthened by a system that imposes liabilities and penalties (including fines and, in some cases, imprisonment) for the responsible authorities of persistent violators. It would seem naive to insist that this would not have significant deterrent effect with respect to EC's long-term pollution prevention

objectives.

Moving forward with additional public consultation:

This report contains suggestions from an ENGO perspective about how the NPRI can be improved; however we also feel that additional public consultation is needed. It is essential that the Environment Canada people developing and implementing the information strategies and outreach programme for NPRI have much more direct contact with the existing and potential users to fully understand what the current limitations are and to come to conclusions on what will solve the problems. We suggest that this take two forms:

- 1) Meet separately with citizen activists, environmental groups, school teachers, media people, etc to explore the value of NPRI to them, the ways in which they currently use it, reasons why they don't currently use it, and thoughts on what could be done to make it more likely that they would use it. Environment Canada should explore holding these meetings at an event by these organizations that is already being held. This increases the number of people that you are likely to be able to include in the discussion. For example, Environment Canada could do a session at a regular meeting of the environmental network in the province or territory, at a teachers' convention, or at a meeting of environmental reporters. The session should be limited to a couple of hours so as to not interfere too much in the event.
- 2) Meet with some people who are actually users of the current website to discuss the problems with the website and ways that it can be improved. We know that Environment Canada is currently in the process of changing the website. These changes should be explored with users to see to what extent the problems are addressed. These sessions should be held in a situation where there is an actual hookup to the NPRI website so users can show the problems they encounter when using it.

When Environment Canada is ready to roll out its outreach program, we suggest the following mechanisms to encourage use of NPRI:

- 1) Hold sessions again in the types of forums described in 1) above to educate people on NPRI and help them understand the value of NPRI for their work and how to use it.
- 2) When NPRI data is released each year, send out a news release to the media. Include with this news release a fact sheet that describes the types of ways that the media could use it to generate stories.
- 3) Publish an annual summary report on NPRI data, with a fact sheet for each province and territory. Environment Canada has not published a summary report since the 2002 data.
- 4) Prepare a citizens' guide showing how to use the NPRI.
- 5) Broaden the distribution to reach through the e-mail networks already in place for the various target groups. For example, put a notice out to environmental groups through the Canadian Environment Network's e-mail lists. Find similar lists for teachers and other targeted groups of likely users.

Environment Canada should carry out some of the activities listed in this section in collaboration with these groups. This increases the likelihood of participation by their memberships and would result in the materials being in a style and addressing the questions that suit the particular audience.

Future Working Group Meetings:

Finally we have a few comments on the workshop held on June 21, 2006. We valued this meeting and think that it is essential that additional meetings be held to receive suggestions for your programs and to receive input on specific proposals that you may come up with for outreach programs.

In order to make future meetings more productive, we urge you to implement the following procedures and protocols:

1. Give people at least six weeks advance notice;
2. Be precise in the meeting notice about the intent of the meeting, the format and the range of people you are inviting;
3. Provide hands-on, interactive opportunity (i.e., workshop) on the NPRI website; and
4. Provide people with a detailed agenda and any background materials at least ten days in advance of the meeting.