



## CLEAN PRODUCTION STRATEGIES:

# PUBLIC ACCESS TO INFORMATION AND THE RIGHT TO KNOW

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## 1. The Growing international movement for Public Right to Know

Public access to information and public participation in decision-making is essential to push for clean production systems. Producers and product designers are made more accountable when communities and workers can find out what an industry is emitting into the environment or when consumers can find out what is in a product.

There has been a growing movement for freedom of information, and as of 2006 nearly seventy countries around the world had adopted comprehensive Freedom of Information (FOI) Acts to facilitate access to records held by government bodies and another fifty had pending efforts. Although the concept of FOI has been around for over 200 years, it is still evolving. Over half of the FOI laws have been adopted in just the last ten years.<sup>1</sup>

### 1992 UN Conference on Environment and Development (the Earth Summit)

At the 1992 UN Conference on Environment and Development (the Earth Summit), The Rio Declaration established twenty-seven principles to govern sustainable development and conservation of the world's natural resources. Agenda 21 is a detailed action plan for realizing the Rio Declaration's goals and Principle 10 called on nations to adopt improved access to information and participation:

*Environmental issues are best handled with the participation of all concerned citizens at the relevant level. At the national level, each individual shall have appropriate access to information concerning the environment that is held by public authorities, including information on hazardous materials and activities in their communities, and the opportunity to participate in decision-making processes. States shall facilitate and encourage public awareness and participation by making information widely available. Effective access to judicial and administrative proceedings, including redress and remedy, shall be provided.*<sup>2</sup>Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters

The Aarhus Convention, named after the Danish city, came into force October 31, 2001 and applies to all the 41 countries who are members of the Economic Commission for Europe, including the European Union. The Aarhus Convention seeks to strengthen the role of members of the public and environmental organizations in protecting and improving the environment for the benefit of future generations. Specifically, it aims to:

- Allow members of the public greater access to environmental information held by public authorities, thereby increasing the transparency and accountability of government;
- Provide an opportunity for people to express their opinions and concerns on environmental matters, and ensure that decision makers take due account of these;
- Provide the public with access to review procedures, when their rights to information and participation have been breached, and, in some cases, to challenge this lack of compliance in a court of law. <sup>3</sup>

*"Although regional in scope, the significance of the Aarhus Convention is global. It is by far the most impressive elaboration of Principle 10 of the Rio Declaration, which stresses the need for citizen's participation in environmental issues and for access to information on the environment held by public authorities. As such it is the most ambitious venture in the area of 'environmental democracy' so far undertaken under the auspices of the United Nations." —Kofi A. Annan, Secretary-General of the United Nations (1997-2006)*

The Aarhus Clearinghouse<sup>4</sup> is a global resource for information about public access to information and participation, not just in the European region. Users can select a variety of search words to access regional developments. For example a search on April 30/09 for access to information legislation in South East Asia revealed a Bangkok news article stating that:

Information on factories in Rayong's industrial estates, part of Thailand's eastern province, will be made public soon to help local villagers learn more about the contaminants in their communities. The Pollution Control Department's (PCD) waste and hazardous substance management bureau had sought more information on the emission of contaminants by the 500 or more factories on the 12 industrial sites in the eastern province. Emission inventories obtained from the factories will be posted on the department's <http://www.pcd.go.th> website in 2009.

## **2. The US Public Right to Know Act: how US citizens can track hazardous emissions**

The **US Toxic Release Inventory (TRI)** was the first globally available public database of information about the toxic emissions of individual companies into the environment.

It was established soon after 1984, when an incident at a chemical manufacturing facility led to a deadly cloud of methyl isocyanate killing thousands of people in Bhopal, India. Shortly thereafter, there was a serious chemical release at a sister plant in West Virginia, USA. These incidents underscored demands by American industrial workers and community groups in several states for information about the hazardous chemicals being released into their communities, particularly as high levels of cancer mortality was increasingly linked to industrialized regions.<sup>5</sup> This increased demand from citizens for public information about the presence of hazardous chemicals near their communities and the amount of emissions into the environment led to the passing of the Emergency Planning and Community Right to Know Act. The Toxic Release Inventory (TRI) was part of the package and this established the first, and currently the most comprehensive, on-line public information resource on industrial practices globally.

Members of the public and also some in industry were shocked when the US Environmental Protection Agency (EPA) published its first TRI data on 1987 emissions: US industry reported releasing over 9.6 billion pounds (4.4 billion kilos) of toxics to the air, water and land. The effect of public pressure on the companies involved prompted the EPA to declare that

*"the impact of TRI has far exceeded our expectations as a tool for improving environmental management" and that the TRI data "should be considered to be among the most important weapons in efforts to combat pollution."*

The U.S. Toxic Release Inventory requires companies, who meet a certain threshold of toxic chemicals used, to report details of amounts of releases to the environment of currently 667 chemicals designated as toxic. This reporting is a mandatory requirement. Companies must report releases to air, water, and land, as well as offsite transfers to sewage plants, recyclers, incinerators, deep well injection, and landfill for recycling or disposal (see Figure1). Since 1991, companies also have to report what types of pollution prevention techniques they are using to reduce emissions.

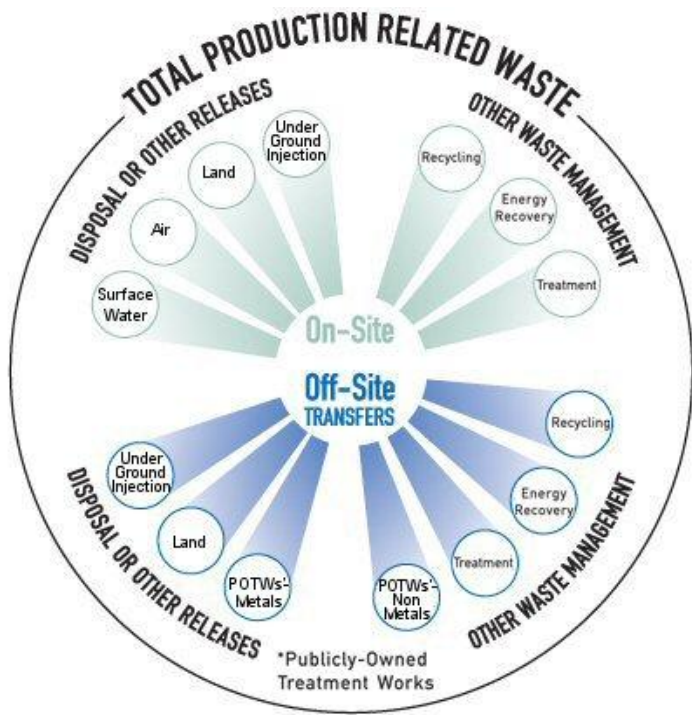


Figure 1. All disposal routes covered by the US TRI

Currently, industry in the USA must report on the release of 667 toxic chemicals via any of these disposal routes. As of 2009 this was the total of chemicals reported, however there is a public process to add or delist chemicals which may alter this total over time.

The information has to be filed each year, and the U.S. Environmental Protection Agency actively disseminates this information to the public via the internet, CDs, a telephone helpline, or by paper reports. The government compiles the data, shows trends over past years, provides information on health impacts for each toxic chemical, lists the worst polluters by company names detailing the total amount of their reported emissions and works to ensure the search functions are user friendly by informing citizens how to find information relevant to their community. All of this information is free.

### 3. Public Right to Know about hazardous emissions goes global: The growing international trend for National Pollutant Release and Transfer Registers

*Having regard to Chapter 19 of Agenda 21 [of the The Rio Declaration] which states, inter alia, that governments with the cooperation of industry should improve data bases and information systems on toxic chemicals, such as emission inventory programmes and that the broadest possible awareness of chemical risks is a prerequisite for chemical safety...member countries (should) take steps to establish, as appropriate, implement and make publicly available a pollutant release and transfer register (PRTR) system. OECD Environment Directorate. February 1996<sup>6</sup>*

One of the ways that countries became active in providing information to the public was an OECD initiative to establish **Pollutant and Release and Transfer Registers (PRTRs)**. The result was a series of workshops convened by the OECD<sup>7</sup> to establish PRTRs modeled after the US Public Right to Know Act and the OECD has published its Guidance to Government to help other countries set up their own national PRTR. A broad coalition of countries completed negotiations on a binding PRTR Protocol under the Aarhus Convention and, in May 2003, 36 nations and the European Union signed the PRTR Protocol, widely considered the most significant expansion of mandatory disclosure requirements to date anywhere. Participating countries are committed to establishing compatible registers that report pollution emissions and transfers of a core list of 91 pollutants in 65 different industrial sectors.<sup>8</sup> In order to facilitate the implementation of the European PRTR, the European Commission in co-operation with the Member States and other stakeholders, has published a Guidance document for implementation of the European PRTR in 22 languages.<sup>9</sup>

By 2007, 17 OECD countries had operational PRTRs and many more were in a process of developing a PRTR. <sup>10</sup> PRTR.net provides a global portal to PRTR information and activities from countries and organizations around the world. The OECD has an interactive website that allows users to access data from each of the participating countries. <sup>11</sup>

The United Nations Institute for Training and Research (UNITAR) has been disseminating PRTR information to non OECD countries. Recently, a Regional Workshop on PRTRs for ASEAN Countries was held in Penang, Malaysia, with the goal of exploring the feasibility of developing PRTRs in the region, and in late 2008 UNITAR in close collaboration with the United Nations Environment Program (UNEP) launched a Global Environment Facility (GEF)-supported Global PRTR Project on POPs monitoring, reporting and information dissemination using PRTRs.<sup>12</sup>

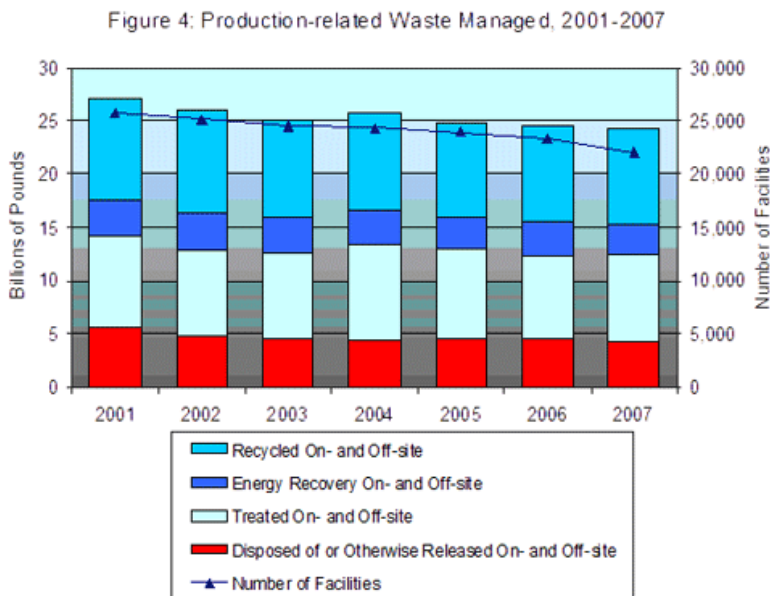
### 4. How does public right to know about hazardous emissions promote clean production?

1. A toxic chemical inventory that tracks how chemicals are brought onto a facility, used and consumed in the process, emitted into the environment and put into products shipped off for sale gives **companies** the clear responsibility for knowing which toxic chemicals they manufacture and use and what pollutants they release to the environment. **By requiring that data be made public, toxic chemical inventories make businesses accountable.** A toxic chemical inventory provides information about

any sources of pollution, giving companies the ability to target and eliminate the problem. In the US, very few companies collected information about their waste and emissions before the Public Right to Know Act was passed (see Factsheet 3 on Toxic Use Reduction).

When the U.S. TRI first initiated its reporting, industry was concerned that the public would misunderstand the data and they would misuse it. In reality, the way that the data has been disseminated to the public has encouraged companies to improve their material use. A few years after the law took effect, a Dow Chemical executive stated that “mandatory disclosure has done more than all other legislation put together in getting companies to voluntarily reduce emissions.”

2. **US States use the TRI data to support their pollution prevention programs and toxic use reduction plans, with clear goals and timelines.** Regulators use the data to set emission permit limits, measure compliance with those limits, and target facilities for enforcement activities.
  
3. **The US federal government uses the data to track trends, to assess the effectiveness of their regulations.** From 1988 to 2007, manufacturing facilities decreased their on- and off-site disposal or other releases by 61% based on chemicals that have been consistently reported since 1988. Overall, from 2001 to 2007, total production-related waste managed decreased by 11%,



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4. Increasingly, TRI data are being used in financial decision-making. **Investment analysts use TRI data to provide recommendations to clients seeking to make**

**environmentally sound investments. Insurance companies look to TRI data as one indication of potential environmental liabilities.**

**5. NGOs use the data to raise the capacity of people to understand the types of hazardous chemicals being discharged into their communities.** For example, in 1990 Greenpeace USA published Zero Discharge: A Citizen's Toxic Waste Audit Manual. This was a tool to help individuals achieve the following 9 goals:

1. Identify the Polluters
2. Identify Where the Waste is Going
3. Prioritize the Polluters
4. Build Pressure for Source Reduction and Toxics Use Reduction
5. Transform the community from NIMBY (not in my backyard) to being a watchdog that maintains pressure to reach zero discharge of hazardous wastes anywhere
6. Issue Annual Report Cards on Polluters
7. Improve the Quality of Citizen Interaction with Regulatory Agencies
8. Use and Enhance Community Right to Know Laws
9. Move toward full material audits of all Waste Generating Facilities

Other community groups continue to involve the public in using their country's PRTR. For example in Canada, Pollution Watch<sup>14</sup> reports on company emissions and correlates these to regions with higher poverty. It gives communities the tools to demand direct accountability from their elected officials to enforce and further strengthen environmental regulations.

**6. Communities use TRI data to begin dialogues with local facilities and to encourage them to reduce their emissions, develop pollution prevention plans, and improve safety measures.**

- For example, after an analysis of 1987 TRI data revealed that an IBM company in the Silicon Valley area discharged the largest quantities of ozone-depleting CFCs in California, a public interest group organized a campaign to reduce those emissions. Within months, senior management at IBM had pledged to completely eliminate the use of CFCs in their products and processes at the plant by 1993.
- The group, Citizens for a Better Environment, released a report entitled "Know Your Local Polluter." It profiled the state's (which state?) top 40 toxic polluters. In addition to TRI data, the report provided other information, such as the companies' compliance histories; maps of major streets, schools, healthcare facilities, and water bodies in the area; information about local populations; and contact information.
- For more information on the Community Right to Know legislation, and a list of good resources about how communities are successfully using the data, see the Endnotes Section 13.<sup>15</sup>

**7. The data can also reveal possible Corporate Double Standards and pressure companies to practice the same level of prevention as in their headquarter countries.**

- A joint report by Friends of the Earth US and Friends of the Earth UK in 1992 surveyed 43 chemical companies to see if they were willing to release information on their toxic releases from facilities in the United Kingdom and elsewhere around the world. Eleven companies agreed to provide the data, while others indicated they would only give citizens the information if they were forced to do so by national legislation. All of the companies were members of the chemical industry's 'Responsible Care' program with its slogan "Don't Trust us, track us!" In addition one of the Responsible Care goals was to provide the public with information about chemical hazards. The report was able to expose the lack of corporate responsibility by these companies.<sup>16</sup>
- In the same year a report by The Public Data Project researched the response of 40 well known corporations to provide right to know data on emissions of toxic chemicals from their largest facility. The report: Toxic Releases from Multinational Corporations: Does the Public Have a Right to Know? Revealed that only six of the forty companies agreed to provide data and most of the companies in Europe refused to provide any information at all. In addition the research discovered that individual chemical plants in Europe were out-polluting the entire US industrial community.<sup>17</sup>

## **5. The TRI and the PRTR reporting systems have built in weakness and should not be the only tool to measure real reductions in toxic chemical emissions**

It is important to recognize the weaknesses of PRTRs:

- The information is estimated and not independently verified except for a limited number of inspections.
- Some facilities are failing to comply or are submitting only partial data.
- Both the TRI and PRTRs tracks emissions data only. There is no mass material accounting required therefore no data is generated on toxic transfers to products. The closest a system comes to this comprehensive approach is the Massachusetts Toxics Use Reduction Act.
- There is no way to know if a reduction in emissions resulted from less manufacturing. Also the TRI and PRTRs only cover a small fraction of the total chemicals used in commerce. The lack of data on most of the chemicals used in commerce also prevents their possible listing as a substance of concern on a PRTR list.

Therefore it is crucial that other industry reporting is done that better represents the real progress in achieving reductions in toxic chemical use within companies, most important of which is the requirement to do full materials accounting and toxic use reduction plans (see Toxics Water Campaign factsheet on Toxics Use Reduction). The plan summaries are publicly available and allow more information about the use of toxics in products.

## **6. Other public right to know tools can hold government enforcement agencies accountable and chart progress on how well companies are complying with discharge permits**

Communities will want to know how well a company is complying with its permits and how well enforcement is practised.

- One effective model is the US Environmental Protection Agency's online tool (ECHO) which provides a readily accessible public inventory of companies' compliance with environmental laws. For the first time, people can find historical compliance profiles with respect to clean air, clean water and hazardous waste laws for some 800,000 facilities. This information was formerly generally available only via slow-moving 'freedom of information' requests. Now company inspection, violation, enforcement, and penalty information is readily available on the Internet.<sup>18</sup>

The ECHO site has been very popular and is used by the public to learn about regulatory oversight and to retrieve the compliance records of facilities in their community; by corporations to monitor compliance across facilities they own and by investors to supplement their assessments of environmental performance at the facility and corporate level. Since ECHO's November 2002 launch, hundreds of thousands of citizens, government officials, investors, and staff at regulated facilities and companies have asked more than three million questions about the environmental records of the more than 800,000 facilities in ECHO.

- The Permit Compliance System (PCS) is a national computerized management information system that automates entry, updating and retrieval of National Pollutant Discharge Elimination System permit information. It was established in 1974 as part of the Clean Water Act and is currently being updated.<sup>19</sup>
- Global Action on Compliance and Enforcement is supplied by the International Network for Environmental Compliance and Enforcement<sup>20</sup> This website portal for Access to Information, Citizen Right to Know, and Citizen Suits Resources is organized by region and by environmental issue, such as successful compliance on water pollution.<sup>21</sup>

## **7. What is the minimum requirement for public right to know about hazardous industrial emissions? What is the best PRTR or reporting model?**

In its Guidance Manual for Governments on how to set up a PRTR, the OECD outlines the considerations that must first go into designing the scope of a PRTR and recommends a 'step by step' approach for countries with no previous PRTR.

The OECD clearly states that any PRTR should have the following minimum characteristics:

1. Reporting on individual chemicals
2. by individual industrial facilities
3. on all releases and transfers
4. to all environmental media (air, water, land)
5. periodically

6. with consistently structured data
7. entered into a computer database, and
8. actively disseminated to the public
9. with limited data withheld as trade secrets,
10. With the aim to improve environmental quality and promote pollution prevention.

The ability for a country to establish a good PRTR depends on many factors including the current state of chemicals listing in the country, the current state of permitting for companies, how the information will be best disseminated to the public and amount of resources available.<sup>22</sup> Research has shown that a country could set up its first PRTR with only two computers, 4 to 5 people to set up the inventory and fewer than 2 people to operate the programme, assuming 150 facilities report release data on 4 hazardous chemicals (the average reporting number from the US experience).<sup>23</sup> It has been demonstrated in Indonesia and China that information about hazardous emissions can be made available to the public in other ways as well.

### **A good starting point with Minimum Effort: The PROPER project in Indonesia**

The Program for Pollution Control Evaluation and Rating (PROPER) in Indonesia was the first major public disclosure program in the developing world, and was a 3 year project launched in June 1995. The PROPER scheme targeted major industrial water polluters and used a five-color scale to grade the environmental performance of different facilities. To achieve the greatest impact on environmental quality, the environmental authority selected major polluters with the highest contributions to rivers' pollution loads to participate in the scheme.

The main assumption was that public disclosure would be the major catalyst for emissions reduction. It did not attempt to follow the PRTR guidelines on what must be measured and publicly reported as this was did not reflect the current state of information or regulations. What it did incorporate however, was a clear high benchmark for pollution prevention. In this aspect the colour scheme was more progressive than simple emissions reporting.

*Black* was awarded to facilities that made virtually no pollution control effort.

*Red* facilities had made some effort but failed to meet legal standards and had insufficient reporting.

*Blue* was given to facilities that met legal standards and had reasonably frequent reporting.

*Green* was intended for the "proactive" companies and was awarded if pollution was significantly below legally required standards and the firm conducted good equipment maintenance, reporting, and environmental work.

*Gold* would reward firms that met international standards of environmental excellence, which in addition to the Green requirements implied the use of clean production technology, waste minimization, and pollution prevention activities.

Besides releasing the ratings, BAPEDAL issued a simple one-page checklist on the environmental performance of the participating firms. Researchers found that the policy was indeed successful in reducing overall chemical and biological pollution, particularly among non compliant firms.<sup>24</sup>

## China

*"Access to information is a pre-condition for public participation, and China has progressed in disclosing environmental information." - Institute for Public and Environmental Affairs, Beijing, 2007.*

In December 2007 the Institute for Public and Environmental Affairs launched the China Air and Water Pollution Map<sup>25</sup>. The database provides information about the air quality, sources of air pollution and waste water discharge in 15 provinces and 150 cities in southern China, including Hong Kong. This is the first and only non-profit database which embodies abundant information on China's water quality, waste water discharge and environmental violators. As the China Daily reported<sup>26</sup>: The air pollution map is the second such blacklist launched by the group. The China Water Pollution Map has made public details of about 9,400 water violations since last year, including those involving up to 280 foreign firms. The water map has led 50 companies, including two local players, to respond; and two have cleared their names so far. To get their names removed from the blacklist, the companies need to comply with the rules and undergo a third-party audit.

Both these first attempts at public information have proven successful in meeting their original goals of holding companies more accountable to the public as well as holding enforcement officers more accountable to the public. Efforts must now continue to make the reporting more detailed and more chemical specific.

The most comprehensive PRTR would require each company to do a full materials audit and publicly report on the use of any chemical listed on international recognized lists of hazardous chemicals. This would expand the number of chemicals being reported to more than 1500<sup>27</sup> and would provide information on the amount of hazardous chemicals being shipped in products for sale. Full material audits for a smaller list of chemicals are already required by both the US states of New Jersey and Massachusetts. See Fact Sheet 3 on Toxic Use Reduction for more information.

As described previously, the US Toxic Release Inventory and other PRTRs only report on specific chemicals that are emitted to air, water and transfers of wastes to other sites such as wastewater treatment plants, landfills, offsite recycling and incineration. They do not provide a comprehensive picture of the hazardous substances that come into a factory, that are used, consumed, and stored in it, and that leave it in a product. Yet, this is the type of information that consumers want and it is the only way that a company will accurately know what is being discharged to water or any other environmental media. It will be important in future to expand both the scope of reporting to include chemical transfers to products as well as the list of chemicals that companies must report on. .

## 8. Action Points

1. Research the state of your country's public right to know laws, with a focus on access to information about hazardous industrial emissions to the environment and compare this with the criteria provided by the OECD. How do the laws work in practice?
2. Pressure your government to establish a comprehensive and mandatory right to know law for industrial emissions to the environment. Ensure that the data is free & actively disseminated, for example through a publicly available internet PRTR type register. Many resources are available to help a country establish a low cost inventory in countries with little previous experience. See the resources section for more information.
3. Use emissions reporting to hold the government and industries accountable for progress towards zero emission of hazardous substances but be mindful of the weakness of the PRTR. Combine PRTR with other clean production strategies such as mandatory toxic use reduction planning and full materials audits. (see Toxics Water Campaign factsheet on TUR)
4. Research the double standards of multinational corporations operating in your country to see if they provide the same information that is required under the US TRI or other PRTR reporting.
5. Ensure your government supplies the public with access to information on permits, compliance and penalties. It is just as important to hold your elected officials accountable for enforcing the laws.
6. Use the media to help disseminate the information on hazardous emissions to the public. Make sure your message is clear and consistent: zero discharge of hazardous emissions through clean production strategies.

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This fact sheet was commission by Greenpeace International and written by Beverley Thorpe.

Clean Production Action. June 2009



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## 9. Endnotes

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- <sup>1</sup> An ongoing overview of Freedom of Information around the world, including the various types of laws, is available at [http://www.freedominfo.org/documents/global\\_survey2006.pdf](http://www.freedominfo.org/documents/global_survey2006.pdf)
- <sup>2</sup> Rio Declaration on Environment and Development, Rio de Janeiro, 3-14 June 1992.  
<http://www.un.org/documents/ga/conf151/aconf15126-1annex1.htm>
- <sup>3</sup> For more information on the Aarhus Convention and the media, see *Implementing the Aarhus Convention: a User Guide for Officials in the Eastern Europe and Caucasus Region* and *Implementing the Aarhus Convention: a User Guide for Civil Society in the Eastern Europe and Caucasus Region*, both of which are available at  
<http://www.rec.org/REC/Programs/PublicParticipation/PublicAwareness/ecca.html>
- <sup>4</sup> Aarhus Clearinghouse at <http://aarhusclearinghouse.unece.org/>
- <sup>5</sup> Caron Chess, "Winning the Right-to-Know: A Handbook for Toxics Activists" (Philadelphia: Delaware Valley Toxics Coalition, 1984)  
<http://www.crtk.org/detail.cfm?docID=752&cat=community%20toolbox>
- <sup>6</sup> [http://webdomino1.oecd.org/horizontal/oecdacts.nsf/linkto/C\(96\)41](http://webdomino1.oecd.org/horizontal/oecdacts.nsf/linkto/C(96)41)
- <sup>7</sup> The OECD's Environment Directorate has published A Guidance Manual for Governments, provides technical overviews of PRTRs and reviews country trends. Visit [http://www.oecd.org/env\\_prtr\\_rc/](http://www.oecd.org/env_prtr_rc/)
- <sup>8</sup> Within the EU, many member states had already established their own National Pollution Inventories prior to the European wide PRTR. The UK's Pollution Inventory was created in 1998 to gather information on emissions from industrial activities. The UK system is similar to the US TRI providing factsheets on substances, interactive maps, and information on who to contact for pollution inventory enquiries. The European Pollutant Emission Register was established in 2000 to fulfill requirements established under the Directive on Integrated Pollution Prevention and Control. Member States had to produce a triennial report on the emissions of industrial facilities into air and waters. The report covers 50 pollutants only. Data on two reporting years has been received and it was found that just over half the facilities that reported between 2001 and 2004 saw a decreased of over 10% in emissions. The European Pollutant Release and Transfer Register (European PRTR) was adopted on 18 January 2006. The E-PRTR's website will be on-line in 2009, providing data of 27 EU countries for the first reporting year 2007.
- <sup>9</sup> Accessible at [http://ec.europa.eu/environment/air/pollutants/stationary/eper/pdf/en\\_prtr.pdf](http://ec.europa.eu/environment/air/pollutants/stationary/eper/pdf/en_prtr.pdf). See also the more synthetic review of EU legislation including the EPRTR scheme in the report: Internal report – Hazardous chemicals in freshwater- Review of relevant EU and related policies, 17 March 2009 by Stefan Scheuer, Europe Planet Earth. <http://intranet.g13/sections/7706>
- <sup>10</sup> For example, the Canadian National Pollutant Release Inventory <http://www.ec.gc.ca/inrp-npri/> was one of the first PRTRs to be established. Environmental groups in Canada have launched their own site as a campaign tool: See Pollution Watch Canada available at <http://www.pollutionwatch.org/>
- <sup>11</sup> Users can create a report of PRTR data according to years, countries, regions, industry sectors, chemicals, types of release sources, and types of releases and transfers.  
[http://www.oecd.org/env\\_prtr\\_data/](http://www.oecd.org/env_prtr_data/); Also visit [www.prtr.net](http://www.prtr.net) for a global overview of PRTR in other countries.
- <sup>12</sup> <http://www.unitar.org/cwm/prtr>
- <sup>13</sup> Graph taken from the most recent TRI report at <http://www.epa.gov/tri/>
- <sup>14</sup> Accessible at [www.pollutionwatch.org](http://www.pollutionwatch.org)

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<sup>15</sup> The US EPA website has extensive information on the Toxic Release Inventory, right to know regulations and compliance and enforcement. <http://www.epa.gov/tri/>; The Right-to-Know Network (RTK NET) provides free access to numerous environmental databases. With the information available on RTK NET, you can identify specific factories and their environmental effects, and assess the people and communities affected. [www.rtknet.org](http://www.rtknet.org); The Environmental Defense Fund in the U.S. developed the Scorecard [www.scorecard.org](http://www.scorecard.org) which is one of the easiest and most user friendly ways to access information about chemicals. The site also details all the TRI data available by zip code, regulations, use in other regions, rankings of company names, and tips on how to lobby for better pollution prevention. Also many states publish extensive information about their toxic release data and right to know efforts. The state of New Jersey publishes free online Right to Know Hazardous Substance Fact Sheets at <http://nj.gov/health/eoh/rtkweb/index.shtml>

<sup>16</sup> Friends of the Earth US and UK. Know More Toxics: Will Companies Give Citizens Around the World the Right-to-Know? July 1992 (scanned copy available from Greenpeace International Water Campaign)

<sup>17</sup> David Sarokin. Toxic Releases From Multinational Corporations. Does the public have a right to know? Public Data Project. 1992. (scanned copy available from Greenpeace International Water campaign.)

<sup>18</sup> <http://www.crtk.org/detail.cfm?docID=671&cat=information%20reform> Visit the EPA site at <http://www.epa-echo.gov/echo/>

<sup>19</sup> NPDES Permit compliance systems. Visit <http://www.epa.gov/Compliance/data/systems/water/pcssys.html>

<sup>20</sup> [http://www.inece.org/forumspublicaccess\\_citizen.html](http://www.inece.org/forumspublicaccess_citizen.html)

<sup>21</sup> <http://www.inece.org/forumswater.html> Also visit the UNEP Public Access to Information at <http://www.unep.org/dec/onlinemanual/Enforcement/InstitutionalFrameworks/PublicAccessToInformation/tabid/91/Default.aspx>

<sup>22</sup> OECD. Guidance Manual for Governments. See endnote 7.

<sup>23</sup> The Right to Know. the Promise of Low-cost Public Inventories of Toxic Chemicals. World Wildlife Fund. Washington DC. 1994

<sup>24</sup> Summary taken from the text of the published article: Public Disclosure of Industrial Pollution: The PROPER Approach for Indonesia? By Jorge García López, Thomas Sterner, and Shakeb Afsah. October 2004 • Discussion Paper 04–34. Resources for the Future. <http://www.rff.org/rff/Documents/RFF-DP-04-34.pdf>

<sup>25</sup> <http://en.ipe.org.cn/>

<sup>26</sup> Global giants on Pollution Blacklist by Wang Zhuoqiong [http://www.chinadaily.cn/cndy/2007-12/14/content\\_6320420.htm](http://www.chinadaily.cn/cndy/2007-12/14/content_6320420.htm)

<sup>27</sup> For a compilation of international lists of hazardous chemicals see the Red List of chemicals of high concern at [www.cleanproduction.org](http://www.cleanproduction.org)