

**The Need for Public Education and Outreach Components in
Pollutant Release and Transfer Registry (PRTR) Programs**

A Non-Governmental Organization Perspective

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I. Introduction

Pollutant Release and Transfer Registries (PRTR) are emerging as one of most important environmental policy innovations of the past thirty years. Registries have the potential to strengthen public understanding and knowledge of pollution problems, enhance the accountability of governments and industry to the public for their actions, and promote reductions in the generation and release into the environment of hazardous and toxic substances.

II. The Potential Uses of PRTR Data

The data generated through PRTRs has the potential to be put to a wide range of uses by a broad constituency of possible users, ranging for governmental environmental agencies, to individual citizens dealing with local pollution problems. These uses include the following:

- * ensuring the right of local communities and the public at large to know about releases and transfers of pollutants;
- * strengthening the ability of the public to hold governments to account for the consequences of their environmental policy decisions;
- * strengthening the ability of the public to hold industry to account for the environmental and health impacts of its activities, and the validity of its claims regarding voluntary reductions in the generation of wastes and release or transfer of pollutants;
- * providing a more sound basis for public policy decisions regarding environmental protection;
- * improving environmental management and promoting and facilitating pollution prevention activities within firms and institutions which generate, transfer or release pollutants;
- * improving investment and insurance decision-making within financial institutions

¹. The Institute is an independent, not-for-profit environmental law and policy research and education organization, founded in 1970 as the Canadian Environmental Law Research Foundation. The Institute may be reached at Suite 400, 517 College St., Toronto, Ontario, Canada, M6G 4A2. Tel: 416-923-3529, Fax: 416-923-5949, home page: <http://www.web.net/cielap>

regarding activities which involve the potential to cause harm to the environment or human health.

III. The Need for Outreach and Education Activities to Accompany PRTR Programs.

This potential for the use of PRTR data can, however, only be fulfilled if the public is made aware of the existence of PRTR programs and has access to the information gathered through them. Failure to build public awareness, on the other hand, can threaten to the continued existence of PRTR programs. Programs in which there is no apparent public interest may become difficult to justify, especially in the face of complaints or opposition from the affected industry sectors.

These are not abstract problems. Even in Canada, where the federal Department of the Environment (Environment Canada) has been relatively active in communicating the existence of the data gathered through the National Pollutant Release Inventory (NPRI), and in making it available to the public, community and environmental organizations have, to date, only made limited use of data. In fact, the most significant user group to emerge in Canada has not be members of the public, or community and environmental groups, but rather private sector financial institutions.

IV. Ensuring Public Knowledge and Accessibility of PRTR Data

A number of steps need to be taken to ensure that the public is informed of the existence of PRTR data, and is able to make use of it.

Public Access to Data

The most basic of these measures is to provide members of the public with access to the data collected through PRTR programs. This can be done in a number of ways:

- * posting PRTR data on the internet home page of the agency operating the PRTR program, as is done in Canada and the United States;
- * making the data available to the public in a CD ROM or floppy disc format; and
- * the provision of annual hard copy summary reports of PRTR data to the public, as is done in Canada, the United States and Australia.¹ The Canadian experience has shown that, in practice, the written summary reports are the initial point of contact with PRTR data for most audiences.

Public access to data needs to be provided in a timely manner. Lengthy delays

between the collection and release of data should be avoided. It is important that members have access to the most up-to-date data as possible. In Canada this has also emerged as an important issue for facilities that report under the NPRI. The late release of data has resulted in firms that have undertaken major pollution control and prevention programs being identified as still being major sources of pollution in media reports on the release the release of PRTR data.

Public access to PRTR data should be provided at no cost, or minimal cost. This is consistent with the public education and accountability goals of PRTR programs, and the objective of achieving the widest possible distribution of the data.

Informing the Public About the Existence of PRTR Data

Steps are also needed to inform the public about the existence of the data and the fact that the public has a right to access it. These goals can be achieved in a number of ways. Coverage in the mass media on the existence and public availability of PRTR data is one of the most effective ways of communicating basic information about PRTR programs to the widest possible audience.

Among other things, this requires presenting the data, both in summary report and electronic formats, in a manner that is accessible and meaningful to non-specialists. Regional breakdowns and analyses of PRTR data can be especially useful in this sense. Environment Canada, for example, has provided an extensive analysis of NPRI and U.S. Toxic Release Inventory (TRI) data for the Great Lakes Region.² The provision of detailed briefings to key media outlets should also be considered prior to the release of PRTR data.

The mass media is able to reach large audiences with a limited amount of basic information of PRTR programs and the data they provide. However, the process of building a constituency of public users of PRTR data requires a number of additional steps. These include outreach and education programs targeted at potential users of PRTR data, such as community groups and environmental non-governmental organizations. These efforts should include presentations on PRTR programs and the means through which the data which they contain may be accessed, and more detailed training programs on how access or analyze the data.

Non-traditional environmental constituencies, including public health agencies and non-governmental organizations, the health professions, such as doctors, nurses, and public health officials, organized labour, aboriginal peoples, and educators, should be included in these efforts as well. The latter category is particularly important, as the conduct of analyses of PRTR data lends itself well to being an assigned project for senior high school, and undergraduate university\college students. Such work can help to build a long-term constituency of PRTR users.

It is important to note that while providing the public with timely electronic access to PRTR data is essential, it suffers from a number of significant limitations. Internet access, and access to the computer capacity and skills necessary conduct analyses of PRTR data remains much more limited than is generally realized, even in Canada. Rural and disadvantaged communities tend have especially serious problems in obtaining access to electronic information. Yet these communities are often among those most affected by pollution problems.

The production of hard copy summary reports, as are provided in Canada, U.S. and Australia, is very useful way of overcoming this barrier to accessing the general information provided through PRTR programs. However, the site specific data which is likely to be of the most interest to community groups and individuals usually cannot be provided in this way.

Steps can be taken by governments to address the issue of electronic access to PRTR data. In the Canadian province of Ontario, the *Environmental Bill of Rights* (EBR), enacted in 1993, provided for the establishment of an electronic registry, on which all proposed provincial environmental laws, regulations, policies, and individual facility approvals and permits, are required to be posted for public comment prior to being finalized.

The problem of providing public access to such an electronic registry was recognized early in the process of developing the Ontario Bill. As a result, the provincial government and the Office of the Environmental Commissioner, an agency established through the Bill, undertook program to provide and install computers in public libraries and other public buildings, such as provincial government offices and city halls, to ensure public access to the registry. Similar programs should be considered as components of PRTR programs.

A number of other steps were taken in the case of the Ontario EBR. An extensive program of presentations and training sessions on the EBR registry has been provided by the Environmental Commissioner's Office over the past four years. These programs have been made available to any group or organization: governmental; Non-Governmental Organizations (NGOs); or private sector, which has requested them. In addition, a grant was provided to the provincial network of environmental organizations to conduct a training program on the use of the electronic registry specifically targeted at environment NGOs. Active training and outreach programs of this nature need to be provided in relation to PRTRs as well.

Other Considerations

The provision of public access to the basic data provided by reporting facilities under PRTR programs is critical element. However, this needs to be done in a way that is accessible and user-friendly. The ideal is to provide members of the public with the

means to design their own searches and analyses of the data. This can be achieved by providing the required software as part of the sponsoring agency's home page posting of the PRTR data, or as part of a package of software provided with the data on a CD ROM or computer disc. PRTR data has also been presented in an on-line, searchable format by NGOs in the United States and the United Kingdom.

In Canada, Environment Canada's home page posting of the NPRI data allows the user to query the NPRI database on specific facilities in each of the reporting years. This feature allows the user to select an NPRI reporting facility, location or release for any pollutant on the NPRI list. The feature displays the facilities' on-site releases and off-site transfers in waste by pollutant. Searches can also be performed by industrial sector.

A number of other measures can be taken to improve public knowledge about and access to PRTR data. These can include the provision of seed money for NGO's, members of the academic community and others to work with PRTR data and demonstrate the different types of analyses that it can be used to develop. The Canadian Institute for Environmental Law and Policy, for example, has received a grant from Environment Canada to work with the Cartography Unit at the University of Toronto to develop a map showing the leading sources of pollutant releases and transfers in Canada.

It is also important that industry pressures to restrict public access to PRTR data or to provide 'context' for the data that is provided be limited. The key purposes of a PRTR program are community right to know, and enhanced industry and government accountability. The achievement of these goals requires that members of the public be provided with full access to the data collect through PRTR programs, and the with the tools to develop their own understanding of data and its significance.

Governments can provide information to help with this process, such as information on characteristics of inventoried pollutants. This is already being done in U.S. and to a limited degree, Canada. However, communities need to be able to arrive at their own conclusions regarding the implications of PRTR data for their health and well-being.

V. Conclusions

PRTR programs represent one of the most important environmental policy innovations of the past thirty years. However, in order to achieve their full potential, PRTR data collection activities need to be accompanied by significant programs of public outreach and education activities. These need to include measures to inform the public of the existence and availability of PRTR data, ensure public accessibility, and to provide specific information, education and training on the use of the data. Such programs may be as essential to the success of PRTR programs as are activities to provide training to facilities on how to report under the registries.

Endnotes

1. See, for example National Pollutant Release Inventory - Summary Report 1994, Summary Report 1995, Summary Report 1996 (Ottawa: Environment Canada, 1996, 1997, 1998).

2. Industrial Releases within the Great Lakes Basin: An Evaluation of NPRI and TRI Data (Toronto: Environment Canada - Ontario Region, 1995).