



European Union Network for the
Implementation and Enforcement
of Environmental Law

Funded by
the European
Union



REPORT
National Peer Review Initiative (NPRI)
on

Review wastewater discharge permitting scientific/technical process
to harmonize procedures

NPRI IMPEL Project VI WG 9
Period 2022 – March 2023

Introduction

Portugal was one of the first countries willing to use the NPRI as a tool to improve its performance. The first topic selected for a peer review activity, to be carried out by the APA with the support of the NPRI project team, was the water discharge permitting process. Many issues, including the pandemic situation, prevented the full development of the activity in 2021 and the first part of 2022, which should have led to the implementation of NPRI activities. Until then, no other specific technical activities have been carried out by APA on the NPRI side. APA is making efforts to restart the process and is discussing this internally and with the regions.

Country visit 18 – 19 October 2022

Given the general improvement in the situation, a country visit¹ to Portugal was considered appropriate to reintroduce and restart the NPRI project and to discuss the methodology and its development with the relevant stakeholders. This country visit was held in from 18 – 19 October 2022 in Lisbon, in which members of the NPRI Project Team and representatives of APA participated. The subsequent meetings were attended by 10 APA officers, representing the central office and the territorial organizational structures. Also, representatives of other countries participated in this visit. To illustrate the project to the participants, the general structure of the NPR activities and the NPRI guideline were presented, as well as the experiences of the NPRI project so far. In addition, the scope, objectives and next steps of the proposed NPRI programme in Portugal were discussed with APA managers and officials (see the report of the visit in annex 5)

Progress NPRI Portugal

A report on APA NPRI activities was given by Anabela Rebelo and Ana Paula Malo, representing APA Portugal. As an NPRI project, the (harmonization of the) water discharge permitting process is still the focus. It was explained that Portugal is divided into five river basin districts where a river basin management plan (RBMP) is implemented. Water abstractions and wastewater discharges require permits. Regarding the implementation of the RBMP, compliance with the conditions contained in the relevant European Directives is leading. Permits are issued through a single platform. In terms of permitting procedures, there are several challenges. Portugal is a relatively small country with asymmetries from north to south. There are different discharge patterns and different considerations when issuing permits. Therefore, the scope of the NPRI includes a review of the scientific/technical process for issuing discharge permits, with the aim of harmonising the existing processes. It is envisaged that the NPRI will focus on an assessment of procedures to find the best and most valuable practices, as well as to identify unnecessary and less useful procedures. It will further seek to continuously improve good practices and identify where and what commitment is needed. Further efforts will be made to exchange knowledge between the five regions involved, identify differences between regional organisations and find ways to deal with them. Furthermore, specific knowledge will be shared and discussed, also with a view to creating a knowledge network to further develop best practices. This approach will also reveal the lack of specific and necessary knowledge. Finally, training needs will also be identified.

¹ Agenda of the meetings: <https://3.basecamp.com/4481666/buckets/17164552/uploads/5461211471>

The activities will be resumed after a new assessment of the available resources to develop the organizational scheme and the practical activities that characterize the performing of a National Peer Review Activity. APA Portugal will develop further steps to deploy their own NPRI scheme, based on further internal contacts and agreements, with the full support of NPRI Project team.

The presentation used during this part of the meeting are available at:

<https://3.basecamp.com/4481666/buckets/17164552/uploads/5461210364>

<https://3.basecamp.com/4481666/buckets/17164552/uploads/5461210375>



Meeting NPRI Project Team, Lisbon – Portugal, 18 – 19 October 2022