

## **Pollutant Release and Transfer Registers Working Group**

### **Comments from the Czech Republic on the Working Document Elements for a Draft Instrument (UNECE CEP/WG.5/AC.2/2001/3)**

#### Preamble

The Czech government reaffirms its support for the development of a comprehensive, multimedia and legally binding Pollutant Release and Transfer Register (PRTR) instrument under the auspices of the Aarhus Convention.

Furthermore, we would like to draw to the attention of the meeting that the Government, through a multistakeholder process, is already working to establish a publicly accessible PRTR in the context of Integrated Pollution Prevention and Control legislation currently being drafted and discussed.

With regard to the working document "Elements for Drafting Instrument (ref. CEP/WG.5./AC.2/2001/7), the Czech government would like to make the following comments and observations to the 2<sup>nd</sup> meeting of the PRTR Working Group (WG).

#### General comments

Along with the majority of UNECE governments, we too support a protocol as the form of legal instrument to be adopted. We favour a protocol as it allows for a comprehensive instrument to be developed with clear legal obligations. We also believe that it should be open to access by non signatory countries of the Aarhus Convention.

Along with the majority of the governments we too are in favour of a step-by-step approach to the development and implementation of a PRTR instrument. We also emphasise the importance from both a data management and cost view of developing electronic reporting by facilities wherever possible.

We also emphasise need for the PRTR to be compatible with the EPER requirements and other international reporting requirement, provided that it is understood in a way which does not prevent the Aarhus instrument being more far reaching from the beginning.

We also emphasise the importance of developing a PRTR instrument on the basis of strong public participation and a firm commitment to public access to information including active dissemination.

#### Specific comments

In terms of three core elements identified for discussion at the second Working group meeting, we have the following comments:

##### 1- Substances

We feel that individual facility reporting of emissions and transfers on specific substances should be the norm, avoiding general classifications unless absolutely necessary. (Criteria for reporting thresholds should also be developed). For the sake of transparency and scientific reasons, criteria should be developed that should include development some

form of transparent mechanism for inclusion and deletion of substances after the adoption of instrument. We feel that priority list of substances should be compiled based on internationally approved lists.

We are in favour of pesticides substances being included in PRTR list as we feel that manufacture of the pesticide substances (active ingredients) is simply one type of chemical production.

We confirm that the Czech government will prepare more detailed proposals on substances and criteria for PRTR substance database for the meeting of Technical Group.

### 2- Activities and facilities

While recognising the need to concentrate initially on point sources of emissions and transfers based on individual facility reporting, we also see a need to address diffuse sources in the future. We agree with the suggestion to have an annex to the PRTR instrument containing the list of activities with the respect to which reports would be required to be submitted. Whilst accepting that Annex I of the AC would be a good starting point of such a list, we stress that the list should remain open-ended to allow inclusion of other activities and facilities based on criteria to be developed.

### 3 - Transfers

Whilst recognising the need to work on more precise definitions/language on "transfers", we are generally in favour of the inclusion of on-site transfers as part of the PRTR instrument. The Czech government feels that progress on this issue in the TG on this issue would be greatly aided by input from governments already dealing with this problem in their existing PRTR systems (e.g. (USA, Canada etc.)).

These are our initial observations and comments. We reserve the right to modify them as well as to address validation and other remaining issues as appropriate.

May 30, 2001

Mr. Jiri Bendl  
Mr. Ondrej Velek  
Ministry of the Environment  
Czech Republic