

Jeremy Wates
Environment and Human Settlement Division
United Nations
CH-1211 Geneva 10
Switzerland

Dear Mr. Wates,

Please find below my comments relating two out of the four items designated for further elaboration by the technical group.

1. Substances (criteria, thresholds etc.)

It is recommended that a core substance list be elaborated by the technical group. The core list should not necessarily involve all the substances which appear on the lists of international or regional conventions. Those lists were designed for reasons different from those of the Aarhus Convention. Therefore involvement of substances of those lists would be supported if they are hazardous to the human health and/or the environment and, in the same time, present a potential exposure for them. The core list would be applicable to most of the ECE countries and be developed on consensus.

for the selection of substances I propose the use of a scoring scheme that was established by Australia (Environment Australia, 2000. *NPI Contextual Data - Background Information*. Accessed June 19 2000.). According to this scheme the inclusion of substances on the PRTR list takes account to the followings:

- Environment effects – should take into account acute toxicity, chronic toxicity, persistence and bioaccumulation of a given substance to arrive at a score for its potential effect on the environment.
- Human health effects – should take into account acute toxicity, chronic toxicity, carcinogenicity and reproductive toxicity of a given substance to arrive at a score for its potential effect on human health.
- Exposure – should take into account the potential release in Hungary from point sources and the bioavailability of a given substance to arrive at a score for exposure.

In selecting substances to the core list all candidate substances would be scored against each of the above criteria with hazard scores from 0 to 3 for environmental effect, human health and exposure. These hazard scores be used to generate a number of overall risk that each substance is characterized by. This risk is expressed as:

$$\boxed{Risk\ Score = (Environment\ Hazard\ Score + Human\ Health\ Hazard\ Score) \times Exposure}$$

The risk scores generated by this process falls between 0 and 18. As in the case of Australia it can be decided that substances with a risk score of 3 or higher should be included on the Aarhus PRTR list.

In my opinion the technical group should adapt this scheme amended as appropriate. For example further refinement is needed in order to extend consideration on environmental hazard to the ozone depletion and/or climatic change potential of the substances.

2. Transfers (on-site, off-site)

It is recommended that a clear definition to the terms „on-site transfer” and „off-site transfer” be elaborated. The definition offered by the working document „Elements for a Draft Instrument on PRTRs” is inappropriate in two reasons. First, it employs terms which are not in use later in the document like „off-site movement” and „on-site movement”. Second, the definition should offer more clarity. To this end my proposed definitions are as follows:

„On-site transfer” means transport of substances themselves or in the form of mixtures or wastes within the boundary of the reporting facility.

„Off-site transfer” means shipment of substances themselves or in the form of mixtures or wastes out of the boundary of the reporting facility to an off-site location.

Finally, there are other terms to be covered by the definitions like „Release to air, water, land, underground”. I will revisit this point when sending comments by 31. May to the working document „Elements for a Draft Instrument on PRTRs”.

Yours sincerely,

Kristof Kozak
Ministry of Environment
Hungary