

Brussels, 21.08.2006

**Comments made by European Commission to the Draft Guidance Document (revised 31.07.2006) for the implementation of the PRTR Protocol**

1. Please check if the listing of "contents" on pages 1-3 is still correct. For example on page 3 the "Definitions based on the European EPER Decision" have to be deleted, since we have deleted them already in the text and in the next line the "proposal for an E-PRTR" has to be shortened to "E-PRTR".

2. page 43, item 12

Please change the first sentence to: "Parties must choose either the capacity/pollutant release threshold system or the employee/pollutant manufactured, processed or used threshold system for all reporting activities.

3. page 91, item 2

"ensures" instead of "ensure".

4. page 106, item 12

Please delete "..., including many high-income countries,..."

I would not say (as it is said here!) that "in many high-income countries, only a limited sector of the population has access to internet at reasonable price or knows how to use it."

5. page 128, headline of b.

Please delete "Guidance". These definitions are originally laid down in the European PRTR itself.

6. Analytical procedures for 86 pollutants

I would recommend to take over Appendix III from the E-PRTR Guidance document which was developed by standardisation experts and includes ISO standards.

7. The PPT presentation on off-site transfers

I might be wrong, but I don't agree that the countries which have chosen the employee/MPU approach have to report both the pollutant **and** the waste specific approach for waste (see slide 3). Therefore slide 3 must be divided into 2, one for the employee/MPU countries who choose the pollutant specific approach for off-site transfers and one for those who choose the waste specific approach.

In the blue boxes of slides 1 and 2 please write instead of 1 iii and 1 iv 1(a)(iii) and 1(a)(iv).