Additional UK comments on the UNECE PRTR guidebook

Our main concern, also raised by the EU rep at the meeting, is that the two capacity methods for determining facilities required to report are not clearly separated in the document. Once a country has decided which method they will use, they will not be interested in text relating to the other. Hence these two strands of guidance should be separated in the document. This point was raised at the last working group a year ago, but no significant changes appear to have been made.

The other major concern was that at one point it appeared that Russian speaking countries would only have one week to comment on a Russian translation of the final document. Considering it is mainly EECCA countries that will need the guidance document, this is much too short a period. Even if an unofficial translation is provided earlier the EECCA countries would need as much certainty as possible with regards to the official text before agreeing to the final Russian translation.

I agreed to provide some updated text as follows:

- p73 – Table 10: No comments from UK on this.

- p86 - Box 4: I agreed to update the web site reference and feel that the text needs changing too, so it now reads:

> **What's in Your Backyard?**
> The Environment Agency of England and Wales has a "What's in Your Backyard" web site that is an example of a PRTR with spatial disaggregation. The web site gives online access to a range of environmental information for England and Wales, including the Pollution Inventory, which is a PRTR of facilities. Information on pollution hazards of waste facilities, water quality, discharges to sea, floodplains and landfill sites can also be accessed. [http://www.environment-agency.gov.uk/maps]

Box 4: What's in Your Backyard? Online access to spatially disaggregated information

- p95 - Box 6: I agreed to update the text and web reference, so it now reads:

> **Requesting information**
> The Environment Agency of England and Wales includes on its web site a section on "Your right to know" with specific information on the "How to make a request for information" toolkit. This includes a telephone number, links to make a request for information online or to find the local office, an enquiry form and the address of the nearest Environment Agency office. [http://www.environment-agency.gov.uk/aboutus/1105530/310151]

Box 6: Requesting environmental information in England and Wales

- p104 – PRTR info in context Box: I agreed to update the text, which now reads:

Putting PRTR information into context

The Environment Agency of England and Wales and Friends of the Earth (an NGO) worked together to improve the official inventory of industrial emissions, adding a Geographical Information System (GIS) for users to locate polluting facilities as well as other features. This cooperation was a success, and with the improvements Friends of the Earth closed its own Factory Watch web site.

The resulting Pollution Inventory provides fact sheets on pollutants in the "What's in Your Backyard" glossary. The information includes:
- symbols indicating the potential hazards of each substance (eg health effects, local effects, global effects)
- sources
- chemical classification
- the scientific name, alternative and trade names
- CAS number
- why the substance was selected for the Pollution Inventory
- physical properties
- potential uses
- standard risk phrases
- controlling legislation and international agreements
- links to further information