

COMMENTS ON BEHALF OF BELGIUM ON THE WORKING DOCUMENT
“ELEMENTS FOR A DRAFT INSTRUMENT ON PRTR’S”

At the first meeting of the Working Group on PRTR's in Geneva (28 February-2 March 2001) the Secretariat presented a document "Elements for a draft instrument on pollutant release and transfer registers" (CEP/WG.5/AC.2/2001/3).

After examination of these document, Belgium can at this stage of the discussions and in a general way live with the text as it is presented by the Secretariat. We also can support the idea that these elements should be worked out as a legally binding instrument under the form of a separate protocol, and not as an annex to the Aarhus Convention.

Nevertheless, Belgium has some questions or remarks to be clarified during the coming negotiation procedure:

1. Concerning the environmental media to be covered by the legally binding instrument, it is not clear what can be understood by "underground injection". Furthermore it should be more appropriate to specify the exactly meaning of "water": does it cover only surface water, or should it also comprise underground waters?
2. On the important distinction of off-site and on-site transfers, Belgium is in favour of the idea that only off-site transfers must be covered by the draft elements. We strongly are opposed to the proposal to include also on-site tranfers, which are considered unfeasable for the reporting authorities.
3. On the list of reporting activities or facilities and substances, to be annexed at the legally binding instrument, Belgium refers at this moment to the list as it is annexed to the EPER-decision and which is the same of the Aarhus Convention. In this context Belgium proposes to take in consideration EPER as a basis with a fased extention to substances and activities.