



**PRTR Protocol to the Aarhus Convention
3rd Meeting of the Working Group of the Parties
(Geneva, 20-21 November 2013)
- Position by the EU and its Member States -**

Item 7(b)(ii). Strategic plan for 2015-2020

The EU and its Member States would like to thank the Chair, the Bureau and the secretariat for their work in developing the draft Strategic Plan 2015-2020. We consider that the most important point of the Plan is the Focal area II "Lifting barriers to ratification and expansion beyond the ECE region".

We recognise the challenges faced by the Bureau and the secretariat in drafting the plan in the absence of national implementation reports or the synthesis report, particularly in relation to "Focal area I". We wish to re-emphasise the statement in paragraph 35(a) of the report of the second meeting of the Working Group of the Parties to the PRTR Protocol (ECE/MP.PRTR/WG.1/2012) which stressed that *"Although the national implementation reports would not be available in time to be considered in the preparation of the strategic plan, they should be used for the purpose of that exercise as far as possible, and the strategic plan should be kept under review in order to address issues arising from the national implementation reports."*

In relation to Focal area III: *"Development of the Protocol"* paragraph 10(a) we suggest replacing the current wording as follows: *"In line with article 6 para. 2, and using experience gained from the development of national pollutant release and transfer registers and the implementation of the Protocol, and taking into account relevant international processes identify areas for possible future improvements of annex I and II to the Protocol"*.

While recognising that national focal points do fulfil various important roles in relation to the implementation of the PRTR Protocol, the last sentence of paragraph 11 under Roles and responsibilities seems to expand the role of national focal points inappropriately by attributing to them responsibilities for the implementation, including monitoring, of the Strategic Plan.
