

**Cefic comments on:
Draft decision on Work Programme for 2015–2017**

Cefic, the European Chemical Industry Council, welcomes the opportunity provided by the Secretariat to comment on the draft decision on the Work Programme for 2015-2017 under the Aarhus Convention.

Cefic supports the view expressed by the EU and its Member States and Croatia at the 16th meeting of the Working Group of the Parties that the future work of the three pillar Task Forces should mainly focus on strengthening information sharing and best practice and, fundamentally, work to support the effective implementation of the Convention by Parties as it currently stands.

Accordingly, we recommend the following modifications:

- i. Under Activity I:
 - a. Instead of “widening the range of environmental information made available to the public”, state “clarifying the range of environmental information currently made available to the public”.

The proposal made by the EU and its Member States and Croatia to focus on helping to further improve the implementation of existing information obligations under the Convention rather than broadening their scope is supported.

We are of the view that there is already a wide range of environmental information made available in the EU, and that the first step should consist into identifying that information.

- b. After “(c) access to raw data and primary statistical data related to the environment”, specify “held by public authorities”. The Convention does not provide any legal basis to grant access to data held by private entities. Hence, the Task Force has no remit to address this issue.
 - c. Finally, we recommend that the issue of consistency between implementation of the Aarhus Convention and compliance with the TRIPS agreement be given a priority by the Task Force on Access to Information.

- ii. Under Activity II, remove the mandate provided to the Task Force to monitor the implementation of the recommendations on Public Participation in decision-making.

We agree with the view expressed by the EU and its Member States and Croatia that the Task Force has no remit to carry out such an assignment.

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