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INFORMATION NOTE

from: General Secretariat of the Council
to: Delegations

Subject: Aarhus Convention: 17th meeting of the Working Group of the Parties
(Geneva, 26-28 February 2014)
- Compilation of statements by the EU and its Member States

Delegations will find in Annex for information a compilation of statements by the EU and its Member States delivered during the 17th meeting of the Working Group of the Parties to the Aarhus Convention (WGP 17) (Geneva, 26-28 February 2014).

Seventeenth Meeting of the Working Group of the Parties to the Aarhus Convention

Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 3(a) of the Provisional Agenda
Access to information

The EU and its Member States thank the Bureau for preparing the draft decision on promoting access to information. Additionally, we welcome the opportunity to comment on the draft decision prior to its finalisation for the seventeenth meeting of the Working Group.

Furthermore, the EU and its Member States appreciate the preparatory work undertaken by the Task Force on Access to Information.

We realize the significance of the first pillar of the Convention for environmental transparency and democracy in compliance with the global environmental principle 10 of the Rio Declaration on Environment and Development.

We welcome the focus on active distribution of environmental information through electronic information tools, e-government and sharing of good practices as well.

We would like to point out that the draft decision mentions the need to allocate fund/resources at two different bullet points (3 & 10). We are of the opinion that it is better to mention the subject only once, in point 10.

Finally, further elaboration is requested as far as the role of compliance mechanism in bullet point 9 (c) is concerned.

Seventeenth Meeting of the Working Group of the Parties to the Aarhus Convention

Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 3(b) of the Provisional Agenda **Public participation in decision-making**

The EU and its Member States thank the Bureau for preparing the draft decision on promoting effective public participation in decision-making (PPDM). Additionally, we welcome the opportunity to comment on the draft decision prior to its finalisation for WGP 17.

Moreover, we appreciate the preparatory work undertaken by the Task Force on Public Participation in Decision-making regarding the environmental matters.

The draft decision on PPDM constitutes a constructive text. However we wish to make the following substantive comments:

- We suggest the removal of the word “*significant*” in the 3rd paragraph in order not to undervalue the work done so far.
- Regarding bullet point 2, we suggest the replacement of the term “*practical tool*” with the word “*guidance*” as well the replacement of the verb “*further*” with the verb “*improve*”. We appreciate the work done, however we express our reservation on the word “*endorse*” since we had not the opportunity to consider and comment on the Recommendations. Therefore we suggest the replacement of the word “*endorse*” with the phrase “*takes note of*”
- In bullet point 5, we suggest the addition of the words “*where possible*” before “*to make resources available*” in order to reflect the limitations on resources available to Parties, Signatories and other stakeholders.
- In Bullet point 11 (c) we suggest the replacement of the word “*implementation*” with the word “*use*”.
- Regarding bullet point 11 (f), we would like to point out that the Task Force should focus on decision-making on large scale projects, including the nuclear sector, climate change and sustainable development related decision making in the context of implementing the Convention’s existing requirements. Therefore we suggest the amendment of the paragraph as follows: “*While taking care to allow sufficient time to address the implementation of articles 6, 7 and 8 generally, investigate possibilities for focusing in greater depth on collaboration with relevant partner organizations, as appropriate, on implementation of the Convention public participation requirements in decision-making in those fields of activity considered to be of particularly high priority at the current time, for example, decision-making for sustainable development; climate-change related decision-making and the nuclear domain*”.

- Regarding bullet point 11 (g), while we welcome the role of the task force as a significant factor to strengthen the implementation of the provisions of the convention, we would like to clarify that the role of the task force is not to elaborate on the existing provisions of the Convention. Emphasis should mainly be on the implementation of the existing legal obligations rather than the developing new ones. Therefore, we request the deletion of the bullet point 11 (g).
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Seventeenth Meeting of the Working Group of the Parties to the Aarhus Convention

Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 3(c) of the Provisional Agenda

Access to Justice

- (1) The EU and its Member States wish to thank the Bureau and the Chair of the Task Force on Access to Justice for the draft decision on access to justice and the report of the Task Force as well as its work to date. We also welcome the opportunity to comment on the proposed future work of this Task Force, including during the next intersessional period.
- (2) We thank the Chair of the Task Force on Access to Justice for the coordination of the study on the implementation of article 9, paragraphs 3 and 4, of the Convention and appreciate the valuable information on the different legal systems of the EU Member states and we expect with great interest the outcome of the study on Eastern Europe, the Caucasus and Central Asia.
- (3) We appreciate the work done by the Task Force towards the promotion of the exchange of information and building capacities by the expansion of the jurisprudence database. In this respect we would like to draw your attention to the new European e- Justice Portal, developed by the European Commission, including the initiative to organize seminars and an online tool of training on environmental law for national judges.
- (4) Noting the proposed topics of the substantive work of the Task Force, we recommend that the following issues should be further explored after taking into account the outcome of the abovementioned study and the work already done in the previous intersessional period, towards the direction of facilitating the implementation of the third pillar of the Convention:
 - the effectiveness of specialized tribunals and administrative review bodies,
 - timeliness,
 - good practices in access to expertise and reducing expert costs.

(5) The draft decision on access to justice constitutes a constructive text. However we wish to make the following substantive comments/amendments:

- We suggest that the text of the decision should be expressed in a positive way taking into account the efforts made and encouraging to further support of the initiatives for a better implementation of the 3rd pillar.
- We note that the support of the activities of national associations of legal professionals and non governmental organisations is within the remit of governments.
- We request the amendment of the 1st Bullet Point to read “*Recognizes the **challenges in promoting** the third pillar of the Convention (article 9) and the need to further **support activities to enhance when necessary** effective access to justice”*
- We suggest the addition of the words “*as appropriate*” in bullet point 4.
- We request the deletion of the words “*and calls on government to support their activities*” in bullet point 7.
- We request in bullet point 8 the addition of the words “*as the case maybe*”, so that the sentence should read “*Encourages Governments to stimulate a multi-stakeholder dialogue aiming at removing **as the case may be**, barriers to access to justice, involving different ministries*”
- We suggest the addition of the words “*in relation to the implementation of the Convention*” in bullet point 11.

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Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 7 of the Provisional Agenda Promotion of the principles of the Convention in international forums

The EU and its Member States would like to thank the Bureau for preparing the draft decision on promoting the application of the principles of the Convention in international forums.

We welcome the opportunity to comment on the draft decision prior to its finalisation for the seventeenth meeting of the Working Group.

We recognize the importance of Aarhus Convention and its principles as of a cross-cutting nature and we consider it as added value to transparent environmental governance including international forums.

In order to make the provisions of draft decision on promoting the application of the principles of the Convention in international forums more feasible and efficient, we wish to make the following substantive comments:

In paragraph 6, we suggest to emphasize the role of expert assistance as an important powerful tool by adding the word “*important*”.

In paragraph 7 we suggest replacing the text with the words “*Considering the challenges in implementing article 3, paragraph 7, of the Convention*” in order to recognize both the work that is already being done and the challenges of balancing the promotion of the Convention’s principles against environmental priorities in the context of other MEAs.

We suggest to replace the wording “*undertake concrete*” by “*further*” in the 5th (a) bullet point in order to highlight the importance of further applying the Almaty Guidelines, while avoiding any establishment of additional obligations for the Parties. The EU already takes into account the Almaty Guidelines at international negotiations and the same applies for each MS separately. The potential establishment of national action programmes etc. would only lead to further bureaucracy and red tape without any further added value.

We request the amendment of the 5th (b) bullet point to read “**Promote appropriate coordination** *within and between its ministries to inform officials involved in other relevant international forums about article 3, paragraph 7, of the Convention and the Almaty Guidelines;*”.

We suggest the deletion of the phrase “*evaluate those practices’ effectiveness and share the evaluations with other Parties*” in the 5th (c) bullet point and its replacement with the phrase “*and share their experience with other Parties*”.

We request the replacement of the words “*take steps*” with the verb “*Continue*” in the 5th (d) bullet point. We should not underestimate the progress made so far.

We request to amend the two bullet points below, as follows:

6(a)(i): *“Providing help assisting and following the efforts of Parties Signatories and stakeholders to implement the article 3 par.7 of the Convention and the Almaty Guidelines with a particular consideration to the Environmental MEAs and any International negotiations dealing with the environmental issues;”* and

6 (a) (ii):*“Sharing experiences from recent forums and Conferences and sharing opportunities and strategies for promoting public participation in international upcoming negotiations following the working group of the Parties”*.

As far as the bullet points 8, we suggest the replacement of the phrase “*allocate sufficient funds*” with the phrase “*continue supporting the implementation of article 3, Paragraph 7 of the Convention*” . Additionally, we request the deletion of the bullet points 8 (a), 8 (b) & b(c).

Seventeenth Meeting of the Working Group of the Parties to the Aarhus Convention

Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 8 of the Provisional Agenda

Agenda of the fifth session of the Meeting of the Parties to the Convention

The EU and its Member States would like to thank the Bureau for preparing the draft provisional agenda for the fifth meeting of the Parties to the Convention.

We welcome the opportunity to comment on the draft provisional agenda prior to its finalisation for the seventeenth meeting of the Working Group.

We would like to express our sincere gratitude to the Government of the Netherlands for the hosting of the MOP5.

We agree with the agenda items and timing.

Seventeenth Meeting of the Working Group of the Parties to the Aarhus Convention

Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 8(b) of the Provisional Agenda Strategic Plan for 2015 – 2020

- (1) The EU and its Member States thank the Bureau for the preparation of the draft decision on the Strategic Plan for 2015-2020 and welcome the opportunity to comment on this draft.
- (2) The draft decision on the Strategic Plan has not taken on board a large number of the comments made by the EU and its Member States until the 21st of October 2013 and to a large extent those are repeated in the present paper and in the track changes on the draft decision. We will therefore make some concrete proposals below.
- (3) We request the deletion of the phrase “*which includes key elements such as poverty eradication, employment, social inclusion, corporate responsibility and gender equality*” in the para 6 because we think that the reference to Sustainable Development includes the aforementioned aspects.
- (4) We suggest the addition of the phrase “where this has not already been achieved” in para 8 in order not to underestimate the achievements to date.
- (5) We request the replacement of the words «*play an important role in supporting*» by «*could contribute as appropriate to*» and the deletion of the phrase «*such as through channelling information, coordinating and/or organizing activities, motivating important target groups and monitoring implementation*» in para.10. The aforementioned activities are beyond the competence of National Focal Points.
- (6) Further elaboration is requested on the following indicative activities or indicators of progress targets:
 - Objective I.1 – We request the amendment of the final sentence under the national heading in the first column to read: “*All activities are to be implemented through a participatory process such as a robust consultation in the preparation of the National Implementation Report*”. Accordingly, the second paragraph under the third column should be amended to read: “*A participatory mechanism, such as a robust consultation in the preparation of the NIR, to monitor progress in the implementation of the Aarhus Convention is operational*”.
 - Objective I.4 – We request the replacement of the word “*strives*” with the word “*endeavour*” .
 - Objective I.6 – we suggest the deletion of the words “*and distribute it to all local authorities*” as it is too prescriptive for a strategy document.

- Objective I.7 – We request the replacement of the words «*procedures for encouraging*» with the word «*encourage*» because the word "procedures" may create more bureaucracy. Consequently, we suggest the removal of the indicator of progress which reads “*Procedures for encouraging proactive officials are in place.*”.
- Objective I.8 (3rd column) / I.9 (1st & 3rd column) – We request the deletion of the words «*Financial and other*» because the word «*support*» includes financial support inter alia.
- Objective I.9 – We request the deletion of the sentence: “*Studies on the impact of civil society’s contribution to environmental management, green economy and sustainable development and statistics on their use*” in the 1st and 3rd column accordingly, because the meaning of this sentence is not clear enough.
- Focal Area III (introductory paragraph) - We request the addition of the of the word «*endeavour to*» after the word “*will*” and the deletion of the word “*as far as possible*”.
- Objective III.5 – We request the deletion of the words «*further developed*», because we consider that the reference to further development of the provisions of the Convention relating to public participation in the preparation of plans, programmes and policies relating to the environment, as well as executive regulations and other generally applicable legally binding normative instruments, goes beyond the primary goal of securing effective implementation of the Convention.
- Objective III.7 – We request the deletion of the sentence «*to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well- being*», because there is no need to focus on one of the Convention’s Objectives.

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Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 8(c) of the Provisional Agenda Programme of Work for 2015-2017

- (1) The EU and its Member States welcome the development of the draft work programme by the Bureau and wish to thank for the opportunity to comment on this draft.
- (2) We think that the level of detail set out in the draft work programme is both useful and practical. However, from the perspective of estimated cost we request further identification of key operational costs.
- (3) We would like to make the following comments regarding substantive issues on the work programme:
 - Access to Information includes electronic information tools: We request to specify that the range of information being made available should be widened within the scope of the Convention. Therefore we suggest the following additions: “*a) The distribution and quality and comparability of environmental information through the effective use of electronic information tools and sharing of good practice, and (b) The further improvement of the implementation of existing information obligations under the Convention*”.
 - Public Participation in decision making: we propose to amend the second paragraph relating to the proposed review of the application of the recommendations on public participation in decision-making, in order to clarify the intention of this review. The amended text should read: “*in order to inform the future work of the Task Force on Public Participation*”. Additionally, we suggest the replacement of the words “*put forward suggestions for further developing*” by “*explore further possibilities for development of*”. Furthermore, we request the deletion of the phrase “*surveys on the application of Recommendations on public participation in decision making*”.
 - Promotion of the Almaty Guidelines etc.: we propose the inclusion of “*on a needs basis*” following the reference to holding of the thematic sessions at meetings of the WGP. The amended text should then read “*Thematic sessions, on a needs basis, at meetings of the Working Group of the Parties...*”

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Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 8(d) of the Provisional Agenda **Financial Arrangements**

- (1) The EU and its Member States wish to thank the Bureau for the draft decision on financial arrangements under the Convention. We also welcome the opportunity to comment on the proposed draft.
- (2) We have had thorough internal discussions on the matter. We recognise that there is a necessity for financial arrangements based on the principles of a fair sharing of the burden, predictable sources of funding, accountability and sound financial management. We consider that the sustainability and predictability on financing the Aarhus Convention is an essential element for effective and efficient International Environmental Governance. In addition, the increase of cost efficiency and the promotion of structural changes constitute significant elements in the same direction. Thus, the discussion on how to ensure a sustainable and predictable financing should not only focus on how to generate a more predictable flow, but also on how to increase cost efficiency.
- (3) We believe that we need to start with a close consideration of the costs required for the effective functioning of the Convention. To this end, it would be desirable to clearly distinguish the operational costs (which are absolutely necessary for the effective operation of the convention, such as staff costs not covered by the UN regular budget and the cost of mandatory meetings) from the costs of non-operational activities (which the Parties may agree to undertake pursuant to the convention's objectives and subject to the availability of resources). This distinction would allow Parties to better understand the operational costs of the convention and would promote savings by more precisely differentiating between required expenses and possible expenses. If it were not possible to do this for the next MOP, a paragraph could be included in the draft decision of the MOP in order to request the Secretariat and the Bureau to introduce this distinction for the following budgetary and financial term.
- (4) We support the introduction of a suggested minimum annual contribution of \$500 for all Parties.
- (5) We request the UNECE to consider the balance in the use of regular budgetary resources between the different sub-programmes and to allocate more resources to the Aarhus Convention and the PRTR Protocol.
- (6) In this regard, we request the following substantive amendments:
 - In the third paragraph we suggest the replacement of the word “*establish*” with the word “*ensure*”.

- In bullet point 1, we request the replacement of the words “*establishes a mandatory*” by “*continue to use the existing interim*”. We believe that this is a gradual process which would require work during the intersessional period to foster the predictability, sustainability and fair sharing of the burden in line with Decision IV/7. Therefore, while supporting the principle of an equitable sharing of the burden and recognising the necessity for stable and predictable sources of funding, we cannot at present support the establishment of a mandatory scheme of contributions.
- Additionally, we request the deletion of bullet points 1 (a) to 1(d), 8 (c) as well as the annex and renumbering accordingly.
- We request the amendment of bullet point 7 to read as follows: “*to ensure the equitable distribution of the financial responsibility for implementation of the work programme and requests the Bureau to liaise with Parties where appropriate concerning the achievement of this goal*”.
- We suggest the addition of the words “*Requests an estimation of the operational costs needed for the effective functioning of the Convention and a clear distinction from the cost of other activities which are subject to the availability of resources*” in bullet point 9.
- We request the addition of a new bullet point 12 as follow: “*Requests the UNECE to allocate more resources to the Aarhus Convention and the PRTR Protocol considering inter alia the balance in the use of regular budgetary resources in the different subprogrammes.*”.

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Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 8(e) of the Provisional Agenda **Reporting requirements**

The EU and its Member States would like to thank the Bureau for preparing the draft decision on reporting requirements.

We recognize that the Aarhus Convention constitutes an important vehicle of ensuring a comprehensive approach to effectively and equitably deal with access to information, public participation in decision-making and access to justice in Environmental matters.

We support that the national reporting is an important tool in demonstrating compliance with the provisions of Aarhus Convention and simultaneously can be used as a self-assessment tool for countries to track their progress, to identify strengths, trends, weaknesses, opportunities as well as challenges and gaps in their national environmental governance.

We realize that the number of national reports that countries are now required to complete is extensive and the subsequent burden placed on countries to meet these reporting requirements is increasing. In order to avoid in some cases duplication of information requirements and reduce the administrative burdens we suggest the promotion of consultations with other UNECE MEAs with the objective to establish where possible a mechanism to ‘streamline’ or ‘harmonise’ national reporting requirements and make the process simpler and less resource-intensive.

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Contribution by the EU and its Member States to the 17th Working Group of the Parties to the Aarhus Convention (WGP 17)

Agenda item 8(f) of the Provisional Agenda **Maastricht Declaration**

The EU and its Member States thank the Chairs of the Meetings of the Parties for preparing in consultation with the Bureau members these draft elements for the Maastricht Declaration.

We welcome the opportunity for a second commenting round on the draft elements for the Maastricht Declaration prior to its submission to the joint high-level segment of the next Meetings of the Parties (Maastricht, the Netherlands, 2 July 2014) for adoption.

We welcome the fact that the draft Declaration reflects in an appropriate manner the commitments of the Convention's and Protocol's Parties to transparency for furthering environmental democracy, sustainable development and improving the state of the environment.

This being said, we suggest the following amendments to the text of the draft Declaration in order to improve and clarify the political messages that it should convey:

- Title: we realize that transparency constitutes a driving force not only for the environmental governance but also for enhancement of environmental consciousness. Taking into consideration this, we suggest the replacement of the word "*multivitamin*" with the words "*driving force*" in the title of the Declaration.
- Paragraph 2: we recognize that the promotion of effective access to environmental information to the public has positive impact on access to justice. In order to highlight this link we suggest the deletion of the phrase "*need to seek*".
- Paragraph 3: we suggest the addition of the phrase "*in respect of environmental information*" in the end of the 1st sentence. Additionally, in the 2nd sentence, we suggest adding the phrase the words "*environmental*" and "*effective*" before the words "*information*" and "*judicial*" accordingly. We suggest these amendments in order to clarify that this concerns environmental information. Furthermore, in the 3rd sentence we suggest to delete "*commitment*" at the beginning and to insert "*better*" before "*decision-making*".
- Paragraph 4: We suggest the amendment of the Paragraph with the addition of the words "*the principles of*" after the word "*promotion of*".

- Paragraph 5: we suggest a number of amendments in order to better highlight the active role of citizens. The text should read as follows: “*We recognize close links between the effective implementation of the Convention and its Protocol **and the importance of protecting** environmental activists and whistle-blowers, freedom of speech and the safe participation of citizens in decision-making affecting their lives. **In any case**, governments should recognize the important role played, as well as the risks faced, by such activists and whistle-blowers, and ensure that they enjoy adequate protection. On the other hand, to reduce the need for whistle-blowers, Governments must ensure transparency as well as remove barriers and overcome challenges to accessing justice. Furthermore, nowadays the **organized actions of the citizens, including those related to the environment, have more impact on Governments than ever**. We urge Governments in their turn to exercise openness and transparency in environmental matters, thus providing **citizens** a solid basis for public participation”.*
- Paragraph 6: the text should read as follow: «*Access to environmental information is a precondition for participatory and transparent governance. Especially in times of economic crisis, the efforts made to improve governance are investments in democracy; the economic crisis should not be seized as an excuse to cut down on environmental protection and procedural rights. In times of economic crisis, access to information, participation and access to justice are even more important, as the focus on solving the crisis has **sometimes** led to increased pressure to weaken measures aimed at protecting the environment. Openness and transparency not only create a foundation for sustainable development leading to an attractive investment climate, but also support policies **to ensure** that all persons are provided with information and can engage meaningfully in decision-making that affects them. Transparency with regard to environmental information is also an important instrument to support innovation, as well as to promote best available techniques and good practices towards the implementation of green economy. In addition, pollutant release and transfer registers (PRTRs) help to evaluate progress in the implementation of green economy».*
- Paragraph 7: we request a number of amendments in the last sentence so that the text should read as follow: “*in this regard, in implementing the Protocol we will strive to contribute to enhancing consistency with other relevant reporting obligations”.*
- Paragraph 8: We suggest the amendment of the paragraph to read “*We acknowledge and encourage increased use of new opportunities offered by modern communication tools, Internet-based and other social media, which are becoming increasingly important for the fast distribution of environmental information to and by the public with instant Internet access, thereby contributing to the promotion of transparency. Another recent trend has demonstrated that the public can play an essential role **in drawing attention on potential environmental damages**”.*
- Paragraph 9: we request the inclusion of the word “*horizontal*” to read “*the only legally binding **horizontal** international instruments*”. Furthermore, we suggest the deletion of “*such as the international financial institutions and trade related organizations*”. At the end of the paragraph we suggest the addition of the words “*relating to the environment or whose decisions may have a significant effect on the environment.*” in order to reflect what was agreed under the Almaty Guidelines.
- Paragraph 10: we suggest the inclusion of the words “*and resolution*” in front of the word “*conflicts*”.

- Paragraph 11: we request the addition of the phrase “*but also to improve their cost efficiency*” at the end of the paragraph.
- Paragraph 12: we suggest replacing it with the following text: “*We warmly welcome the initiative on developing a regional instrument on environmental rights in the region of Latin America and the Caribbean as well as the establishment of PRTR systems around the globe, and we encourage similar initiatives intending to replicate the achievements of the Aarhus Convention and its Protocol. We also call upon countries that are interested in doing so to join the Aarhus family, since the Aarhus Convention and its Protocol are open to accession by countries outside the ECE region*”.
- Paragraph 13: we request the deletion of the text after "Protocol".
- Paragraph 14 (new): We suggest the addition of a new paragraph as follows: *We also call upon the countries within the ECE Region having not yet ratified or acceded to the Protocol to do it at the earliest opportunity and to apply its principles and provisions. We recognize the importance of promoting capacity-building in countries with economies in transition as well as the important role of Aarhus Centres and international organizations in facilitating implementation of the Convention and its Protocol in these countries*
- Paragraph 17(new 18): we suggest to amend this paragraph as follows: “*We recognize that products can significantly impact the environment throughout their lifecycle and when they have reached the end of their lifetimes. We therefore consider that promoting greater transparency in relation to information about products and product-related decision-making is **an important activity***”.
- Paragraph 19 (new 20): we request to amend this paragraph as follows: “*In addition, greater transparency concerning the pollutants stored onsite transfers of waste **helps** the public to be better aware of the scale of the risk from accidental releases* ”
- Paragraph 20 (new 21): we request the replacement of the word “*should*” with the phrase “*may need to*”.
- Paragraph 21 (new 22): we suggest the replacement of the words “*an essential minimum*” by “*solid*”.
- Whole document: the text should be renumbered accordingly.

