

Consultation on EU Implementation Plan (UIP)

1. Who are you?	
Your name (first and last name) <small>-open reply-(compulsory)</small>	Thomais Vlachogianni
In which capacity are you participating in this consultation? <small>-single choice reply-(compulsory)</small>	on behalf of an organisation
If responding on behalf of an organisation, please indicate below which type <small>-single choice reply-(compulsory)</small>	NGO, civil society, environmental group, charity
Please indicate the full name of your organisation. <small>-open reply-(compulsory)</small>	Mediterranean Information Office for Environment, Culture and Sustainable Development
Please indicate the country where your organisation is based. <small>-single choice reply-(compulsory)</small>	Greece
It is intended that received contributions, together with the identity of the contributor, will be published on the Internet. Please click Yes below to indicate you understand and accept this. If you do not, please ensure you have read the Privacy Statement for what to do if you wish to opt out and what this may mean, then click No below and provide your explanation in the 'drop down' text box. <small>-single choice reply-(compulsory)</small>	yes
In which policy area or scientific area are you / is your organisation mainly involved? (You may choose more than one alternative) <small>-multiple choices reply-(optional)</small>	public information - other
2. The new UIP - Part I: Party Baseline	
Are there areas where you consider further elaboration is needed? <small>-single choice reply-(optional)</small>	yes
Which areas do you think need further elaboration? <small>-multiple choices reply-(compulsory)</small>	public information - emerging POPs
Here, please indicate and explain what further elaborations are needed. Please provide detailed information, figures or graphs that can possibly directly be taken up in the final version of the second UIP. <small>-open reply-(optional)</small>	
To our view para 2.5. on Information Exchange, Public information, awareness and education should be further elaborated. Perhaps a table with indicative examples of awareness raising and educational tools/materials developed within the framework of EU funded POPs related projects could be listed. Also para 3.4. Information on the state of knowledge on stockpiles and contaminated sites could be further elaborated and enriched with data an graphs based on existi8ng studies, as well as an indicative list of sites contaminated with POP pesticides associated with POP-pesticide stockpiles and former sites where POP pesticides have been stored.	

3. The new UIP - Part II: Implementation Plan

Do you consider the proposed legislative measures to be sufficient? -single choice reply- (optional)	sufficient
Are there areas you feel should be improved? -single choice reply-(optional)	yes
Which areas should be improved? -multiple choices reply-(optional)	Implementation of the obligations on supporting activities - EU research projects since 2007 with references to POP issues
Action 1 Commission to collect available data on presence of PBDEs in vehicles and facilitate exchange of information among the Member States -single choice reply-(optional)	agree
Action 2 Commission to gather information on the separation of PBDE-containing materials in the recycling flow of WEEE in the community and depending on the outcome consider further actions -single choice reply-(optional)	agree
Action 3 Commission to gather information on approaches to control the export of waste plastic containing PBDE in particular electronic waste in the Member States and depending on the outcome and the quality of information consider further actions -single choice reply-(optional)	agree
Action 4 Commission to compile information on PFOS alternatives from the REACH process and feed this information into the Stockholm Convention process on alternatives to PFOS to guide the selection process of PFOS alternatives for the different application areas -single choice reply- (optional)	agree
Action 5 Commission to support the validation of a CEN standard on measurement of PFOS in coated and impregnated solid articles, liquids and fire-fighting foams -single choice reply-(optional)	no opinion
Action 6 Commission to investigate the possibility to initiate international work on development of	no opinion

individual tariff codes for POP substance -single choice reply-(optional)	
<p>Action 7</p> <p>Commission to make a proposal for amendment of Regulation (EC) No 689/2008 introducing for Endosulfan a total export ban -single choice reply-(optional)</p>	agree
<p>Action 8</p> <p>Commission and Member States to ensure that the POP assessment is properly incorporated in the assessment of chemicals subject to different legislative provisions within the EU (in general as continuous task) -single choice reply-(optional)</p>	agree
<p>Action 9</p> <p>Commission and Member States to ensure that the IED (formerly IPPC Directive) and related implementation measures take the reduction of unintentional produced POPs into consideration -single choice reply-(optional)</p>	agree
<p>Action 10</p> <p>The Commission and Member States to establish an overview on BAT-AELs from the BREFs along with the applied techniques and assess in the context of the review of the BREFs for what IPPC/IED installation further BAT-AELs should be developed. Here all involved players should give special attention to inclusion of information on the prevention of the formation and control of POP releases -single choice reply-(optional)</p>	agree
<p>Action 11</p> <p>To assess levels of PCDD/PCDFs in critical solid residues (fly ashes) and articles and consider to possibly develop BAT-AELs in this respect -single choice reply-(optional)</p>	agree
<p>Action 12</p> <p>Commission to table an implementing measure to set out minimum eco-design requirements for solid fuel small combustion installations -single choice reply-(optional)</p>	agree
<p>Action 13</p> <p>The Commission to work with Member States to examine how the characterisation of PeCB releases can be improved, and to identify</p>	agree

<p>whether BAT/BEP could be appropriately updated to further decrease PeCB releases</p> <p>-single choice reply-(optional)</p>	
<p>Action 14</p> <p>To minimize disposal of PBDE containing wastes according to POPs regulation (EC No 850/2004) by setting limit values for PBDEs. MS to ensure that PBDE containing waste is disposed of in line with the POP Regulation</p> <p>-single choice reply-(optional)</p>	agree
<p>Action 15</p> <p>Member States to give preference for destruction of PBDE containing wastes with energy recovery in line with the waste hierarchy</p> <p>-single choice reply-(optional)</p>	no opinion
<p>Action 16</p> <p>The Commission and Member States as part of the regular review process of BREFs to evaluate appropriateness of facility type to treat PBDE containing materials and to identify whether BAT/BEP could be appropriately updated to decrease emissions of brominated and brominated-chlorinated dioxins</p> <p>-single choice reply-(optional)</p>	agree
<p>Action 17</p> <p>To minimize disposal of PFOS containing wastes according to POPs regulation (EC No 850/2004) by setting limit values for PFOS and PFOS precursors. MS to ensure that PFOS containing waste is disposed in facilities in line with the POP Regulation</p> <p>-single choice reply-(optional)</p>	agree
<p>Action 18</p> <p>Commission and Member States to ensure that all players (including industry) are fully informed about the obligations under the Stockholm Convention</p> <p>-single choice reply-(optional)</p>	agree
<p>Action 19</p> <p>Commission and Member States to exchange their experiences and success stories with other countries</p> <p>-single choice reply-(optional)</p>	agree
<p>Action 20</p> <p>Commission to facilitate the identification of substances that can be used as alternatives to POPs and to disseminate their risk assessment reports more widely</p> <p>-single choice reply-(optional)</p>	agree

<p>Action 21</p> <p>The Commission and Member States to evaluate the need for and the added value of a concerted action - coordinated information campaigns at European Union level - in the field of POPs taking into consideration the obligation of Member States to disseminate environmental information on POPs pursuant to Directive 2003/4EC -single choice reply-(optional)</p>	<p>agree</p>
<p>Action 22</p> <p>Commission to promote that the next Research Framework Programme Horizon 2020 covers POP-related topics, thus allowing for support to projects examining inter alia long-term health impacts of exposure to POPs at environmentally relevant concentrations or development of affordable alternatives to POP substances still in use -single choice reply-(optional)</p>	<p>agree</p>
<p>Action 23</p> <p>Commission to support exchange of information and/or coordination of research both on community and international level with a view to minimising duplication of effort</p> <p>-single choice reply-(optional)</p>	<p>agree</p>
<p>Action 24</p> <p>Commission to promote a more coherent approach to the generation, collection, storage and use of chemical monitoring data in relation to humans and the environment, through the creation of a platform for chemical monitoring data -single choice reply-(optional)</p>	<p>agree</p>
<p>Action 25</p> <p>The European Union should develop mechanisms for better coordination between the bilateral aid programmes of the Commission and those of the Member States with regards to POPs -single choice reply-(optional)</p>	<p>agree</p>
<p>Action 26</p> <p>To consider the scope for funding POPs related assistance when preparing and approving the Thematic Strategy Paper (TSP) governing the use of the ENRTP for the period 2011–2013 and thereafter when drawing up the Annual Work Programme (AWP) -single choice reply-(optional)</p>	<p>agree</p>
<p>Action 27</p> <p>Commission to launch infringement procedures against the Member States in case of</p>	<p>neutral</p>

<p>non-compliance -single choice reply-(optional)</p>	
<p>Action 28 Commission to verify the need for continuation of specific exemptions and registered acceptable purposes for Annex A and Annex B substances -single choice reply-(optional)</p>	<p>do not agree (please comment below)</p>
<p>Action 29 Commission to use information and data gathered under EU legislation to identify further candidates for the inclusion into the Stockholm Convention and the POP Protocol -single choice reply-(optional)</p>	<p>agree</p>
<p>Action 30 Commission and Member States to continue work on identification of potential POP substances warranting international action. Commission to initiate formal proposals by the Union, when appropriate. Commission and the Member States to increase and strengthen Union wide and international cooperation and information exchange concerning identification of potential POP substances and on concentrations of emerging POP substances especially in remote regions and on the extent of trans-boundary dispersion -single choice reply-(optional)</p>	<p>agree</p>
<p>Which action(s) do you think should be refined, and how? Please indicate separately for each action you would like to comment on (stating action and number). -open reply-(optional)</p>	
<p>To our view one of the actions that should be refined is action 21. There is an integral need for coordinated information campaigns on POPs at EU level and efforts towards that direction should be intensified.</p>	
<p>Are there additional areas/actions you consider should be included in the UIP that aren't covered in the consultation document? -single choice reply-(optional)</p>	