

**Protocol on Pollutant Release and Transfer Registers  
to the Convention on Access to Information,  
Public Participation in Decision-making  
and Access to Justice in Environmental Matters**

**QUESTIONNAIRE  
POLLUTANT RELEASE AND TRANSFER REGISTERS: USAGE OF THE  
PRTR COST MODEL**

This questionnaire has been prepared pursuant to decisions of the first meeting of the Working Group of the Parties to the Protocol on Pollutant Release and Transfer Registers (Protocol on PRTRs) held on 28-29 November 2011 in Geneva. The Working Group of the Parties agreed that progress in relation to the PRTR cost model use be monitored and addressed at the next meeting of the Working Group of the Parties in 2012.

The PRTR Cost Model is a tool to assess the cost involved in the implementation of the Protocol on Pollutant Release and Transfer Registers (Protocol on PRTRs) to the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention). The cost model enables the development of detailed estimates of the magnitude of costs of monitoring emissions (releases) of substances, contained in the annex to the Protocol, to different environmental media (air, water and land) in order to assist Parties to the Protocol with its implementation. Data in relation to PRTR cost model, including cost model files and descriptive documents is available at:

<http://www.unece.org/environmental-policy/treaties/public-participation/protocol-on-prtrs/areas-of-work/envppprtrcb/prtr-cost-model.html>

The questionnaire is being sent to all National Focal Points (NFPs) for the PRTR Protocol and where a PRTR NFP has not yet been designated to the NFP for the Aarhus Convention. The questionnaire aims to:

- ascertain which countries (if any) are using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol,
- ascertain how useful it is to those countries,
- ascertain which countries are not using the PRTR cost model,
- ascertain why the cost model is not being used in those countries,
- ascertain what other methods (if any) countries are using to assess the cost involved in the implementation of the PRTR Protocol.

The secretariat will report on the results of the survey to the Working Group of the Parties at its second meeting, scheduled for 20-21 November 2012.

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ALBANIA

**CONTACT INFORMATION**

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**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: No

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: As regard to PRTR cost model we are not familiar. Due to lack of capacity, the national register on data emissions by industrial activities has yet to be compiled. Law “On environmental protection” designed under CARDS 2006 project INPAEL, anticipates the developing of the Pollutant Release and Transfer Register to be administered by the Environment and Forestry Agency. **The Draft Decision Council of Ministers for PRTR (Draft 3 Final of 28 January 2010)** is in line with the EC Regulation 166/2006 of the European Parliament and of the Council (hereafter referred to as the ‘E-PRTR Regulation’) concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC” implementing at the EU level the UNECE PRTR (or Kiev) protocol. **This DCM is planned to be approved within march**

**2013.**

During this year the Environment and Forestry Agency has been supported by the EU project, Consolidating environmental Monitoring System in Albania (CEMSA). Actually the CEMSA products are: *PRTR Guidance Manual, PRTR proposed structure, list of Albanian facilities under PRTR.*

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: There is no any method approved or implemented. We would like to know the PRTR cost model, as we are going to submit to the Government for the next year the draft Decision on PRTR system in Albania. This draft decision should be accompanied by a financial cost for its implementation, so the PRTR cost model will serve as very important tool for us.

AUSTRIA
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<b>Questions</b>
1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?
A: No
2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.
A:
a. Very useful, because.....
b. Partially useful, because.....
c. Not useful because.....
3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.
A: We have cost models for legislative acts in general, assessing the administrative costs as well as the costs for citizens or enterprises.
4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: There are guidelines for the assessment of the financial impact of new legislative acts (Federal Law Gazette II No. 50/1999 as amended by Fed. Law Gaz. II No. 145/2012) and the so called “standard cost model guidelines” (Fed. Law Gaz. II No. 278/2009). The system is currently being changed.

CZECH REPUBLIC
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<b>Questions</b>
1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?
A: <b>NO</b>
2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.
A:
a. Very useful, because.....
b. Partially useful, because.....
c. Not useful because.....
3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.
A: <b>The PRTR Cost Model was not available at the time of establishment of the Czech national PRTR - this is one of the reasons why the Czech Republic does not use this Cost Model. However a few studies have been prepared on this topic. But these studies have been primarily focused on specific issues (reporting obligations) of the Czech national PRTR (e.g. pollutants in the off-site transfers of waste, activities that are not mentioned in Annex I of the Regulation No 166/2006 as well as styrene and formaldehyde), so we can not use them generally. We still evaluate it and consider the introduction of the Cost Model because we have to take into account financial possibilities of the reporters.</b>
4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?
A: <b>Regulatory impact assessment (in case of legislation changes)</b>

DENMARK

**CONTACT INFORMATION**

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**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: No.

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: We have implemented all the requirements according to the PRTR.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: None in progress.

FRANCE

**CONTACT INFORMATION**

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**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: To date, we have not yet use the PRTR cost model.

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: In France, the industrial operating permit (under the European Union's Integrated Pollution Prevention and Control (IPPC) process) fix the emissions monitoring exercise. As mentioned in the “note on a cost model for the establishment of Pollutant Release an Transfer Registers (ECE/MP.PRTR/WG.1/2011/3)”, this information is then also used to fulfil the annual reporting requirement under the national PRTR (GEREP system). It is therefore clear that the parameters for most emissions monitoring in France is dictated by the terms of the licence, while the annual reporting under the PRTR can be viewed as a by-product of this process, which does not really impose additional costs on enterprises.

For breeding, the ministry is developing a methodology for estimating air emissions under the site's activity. The application of this methodology will allow a cut in the implementation of the national PRTR for farmers.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A:



GEORGIA
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<b>Questions</b>
1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?
A: No
2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.
<p>A:</p> <p>a. Very useful, because.....</p> <p>b. Partially useful, because.....</p> <p>c. Not useful because.....</p>
3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.
A: In Georgia, PRTR cost model is not developed yet. The Ministry of Environment Protection of Georgia (MoEP) is responsible for the guidance of the state inventory, reporting and assessment of the qualitative and quantitative indices of the state of the environment, which does not include cost assessment. Introduction of the PRTR cost model in the country requires changes in the relevant national laws/regulations, additional staff and sufficient resources at the MoEP.
4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?
A: As it is mentioned above (Q3, A), PRTR cost model is not used in Georgia. Only information on quantitative and qualitative characteristics of harmful substances actually emitted into the ambient air and discharged into surface water bodies is submitted to the MoEP within the reporting period on an annual basis by all enterprises operating on the territory of Georgia, which is an obligatory requirement. The MoEP puts the received information in its database. Based on the given data, the MoEP identifies large polluting sources and substances per regions and cities

of the country, prepares final reports, and places them on the websites of the MoEP and the Aarhus Centre Georgia, which are accessible for the public.

GERMANY
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<b>Questions</b>
1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?
A: No
2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.
A:
a. Very useful, because.....
b. Partially useful, because.....
c. Not useful because.....
3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.
A:Germany started PRTR implementation before the cost model was available.
4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?
A: The cost estimates were based on practical experiences. Germany already had a comprehensive three annual reporting obligation for air emissions. Together with the experiences of the EPER Situation this formed the basis for the implementation of the PRTR-Process. This development was simultaneously used for a consolidation of different reporting obligations, so that "net result" of the implementation of the PRTR was an overall reduction of bureaucratic efforts and costs.

IRELAND
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<p><b>Questions</b></p>
<p>1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?</p>
<p>A: No</p>
<p>2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.</p>
<p>A:</p> <p>a. Very useful, because.....</p> <p>b. Partially useful, because.....</p> <p>c. Not useful because.....</p>
<p>3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.</p>
<p>A: It is too complex, not user-friendly and in part, is based on inaccurate component assumptions.</p>
<p>4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?</p>
<p>A: Ireland ratified the PRTR Protocol on 20 June 2012. The building of a PRTR system, which took place prior to ratification, involved (i) identifying reporting requirements, (ii) identifying I.T. systems and staff needs to put all reporting requirements in place, and (iii) obtaining budget from central government following a tendering process, to meet I.T. infrastructure and staff needs for set-up and on-going management and operations of systems.</p>

ISRAEL
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<b>Questions</b>
1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?
A: No
2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.
A: a. Very useful, because..... b. Partially useful, because..... c. Not useful because.....
3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.
A:I just learned of it from this questionnaire
4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?
A:We assessed the costs in a reporting pilot, done before the PRTR legislation phase

LITHUANIA

**CONTACT INFORMATION**

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E-mail: ... v.juozefaitė@aaa.am.lt.....

Website: .....

**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: NO

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: It is not necessary to assess the cost involved in the implementation of the PRTR Protocol since most of the data reported by the operators is collected according to national requirements not related to the PRTR Protocol.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: No national cost models/methods are used (see answer above).

REPUBLIC OF MACEDONIA

**CONTACT INFORMATION**

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Last Name: (Ms/Mr) Shakiri.....

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....

**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: No my country is not using the PRTR cost model.

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: R. Of Macedonia has ratified the PRTR Protocol in 2010, prepared and translated number of documents related to PRTR Protocol, which means that we are still in the beginning of the process of PRTR Protocol implementation, and one of our next steps related to this issue will be using this PRTR cost model.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: Since we are still at beginning of the implementation process of PRTR Protocol, we have to determine the methods which are going to be used in order to effectively and successfully implement the Protocol.

NETHERLANDS

### CONTACT INFORMATION

Please provide name and contact data of the person who filled in the questionnaire:

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Last Name: (Ms/Mr) Schaap.....

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### Questions

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: NO

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: Implementation of PRTR rather meant a modification of a existing reporting tool in the Netherlands. We had no need to build or implement a totally new system.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: The Netherlands do not use a system to assess the costs involved in the implementation of the PRTR Protocol. Our Ministry however compensates the competent authorities, mainly provinces and municipalities, for the validation of the reporting by relevant companies with a payment of €79.000,= annually. This was calculated on the basis of historic experiences.



NORWAY

**CONTACT INFORMATION**

Please provide name and contact data of the person who filled in the questionnaire:

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Last Name: (Ms/Mr) .....Bingh.....

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Website: [www.klif.no](http://www.klif.no), [www.norskeutslipp.no](http://www.norskeutslipp.no)

**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: No

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: The Norwegian PRTR-system was established before the PRTR Protocol entered into force. However, the Norwegian PRTR-system has been extended to comply with the PRTR Protocol. Some information is also still lacking on our PRTR-website, [www.norskeutslipp.no](http://www.norskeutslipp.no) to fully comply with the protocol.

It was accepted as a need for Norway to have a PRTR website including emissions and transfers from facilities. It never was a question of whether we should have such a system or not. Hence, no modelling of costs as the PRTR cost model has been necessary.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A:

SLOVAKIA

**CONTACT INFORMATION**

Please provide name and contact data of the person who filled in the questionnaire:

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Last Name: (Ms/Mr) **Kapustova** .....

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**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

**A: Up to the present time Slovakia does not use the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol, which has been prepared to be a voluntary tool in case of need.**

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

**A: Slovakia highly appreciates the work done on developing the cost model – a tool to assess the cost involved in the implementation of the protocol on PRTRs to the Aarhus Convention but since the cost model was prepared to be fulfilled through questionnaires on the facility/enterprise level and at the present time it is rather difficult to obtain requested data for completing questionnaires from majority of the Slovak enterprises related to PRTR (or E-PRTR) issues.**

**According to the amount of data required in the cost model, and required level of detail of this data we would like to note that facilities management in some cases consider such information as sensitive and that's the reason why not to provide such information.**

**Having an experience of environmental information collection and monitoring of the relevant facilities, we would like to point out that facilities are often overloaded with quite a lot of reporting**

**obligations according not only to the national, but also European legislation as well.**

*At the country level:* due to the lack of personal capacities, Slovakia is being currently just in the stage of identification of the most effective way how to use the cost model. An analysis on identification of all data flows needed to fill the sheets of the cost model on the country level has just started, the same stands for *facility level*; Slovakia plans to start discussions with representatives of the industrial enterprises, which seems to be the best way how to explain an importance of the PRTR cost model requests.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

**A: Industrial associations/enterprises are very active in assessing potential costs expected to be spent after new legislation coming into force, mostly related to EU directives, for example Directive on Industrial Emissions (75/2010/EC).**

**Some information in case of need might be obtained from the annual reports of the significant facilities, but we would like to note that in spite of the fact that the whole territory of the country has not been covered yet, there are efforts to improve the present situation.**

SWEDEN

**CONTACT INFORMATION**

Please provide name and contact data of the person who filled in the questionnaire:

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**Questions**

1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?

A: No

2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.

A:

a. Very useful, because.....

b. Partially useful, because.....

c. Not useful because.....

3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.

A: We have so far not identified a need.

4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?

A: -

UNITED KINGDOM
<p><b>CONTACT INFORMATION</b></p> <p>Please provide name and contact data of the person who filled in the questionnaire:</p> <p>First Name: Nicholas</p> <p>Last Name: (Ms/<b>Mr</b>) Obe</p> <p>Position: Policy advisor.</p> <p>Name of the Organization: Department for Environment Food and Rural Affairs</p> <p>Address: 5F Ergon House, Horseferry Road, London. SW1P 2AL</p> <p>Telephone: 44(0)2072385304</p> <p>Fax: .....</p> <p>E-mail: <a href="mailto:Nicholas.obe@defra.gsi.gov.uk">Nicholas.obe@defra.gsi.gov.uk</a></p> <p>Website: <a href="http://www.defra.gov.uk/industrial-emissions/">http://www.defra.gov.uk/industrial-emissions/</a></p>

<b>Questions</b>
1. Is your country using the PRTR cost model to assess the cost involved in the implementation of the PRTR Protocol?
A: No. PRTR was implemented in the UK several ago before the cost model came into effect.
2. If your answer to Q1. is YES, how useful do you find the PRTR cost model is in assessing the cost involved in the implementation of the PRTR Protocol? Please select one of the options (a, b, or c) below and please briefly describe what aspects you find useful (if any), what aspects you find that are not useful (if any) and the reasons for your selection.
A:
a. Very useful, because.....
b. Partially useful, because.....
c. Not useful because.....
3. If your answer to Q1. is NO, please describe the reasons why your country is not using the PRTR cost model.
A:Please see response to question 1
4. What other methods (if any) is your country using to assess the cost involved in the implementation of the PRTR Protocol?
A: PRTR is implemented partly through existing resources in the public sector and partly through a contract agreement with an external technical partner. The contract is the main mechanism for monitoring and assessing costs.