But in the Federal Republic of Germany at least and probably in all the other Member States, many institutions are already engaged on model-building. Therefore, it should be examined whether comparable results cannot be obtained for less than the 3 940 000 units of account proposed by the Commission by amalgamating or extending existing systems models. Finally, the collection of information of this sort is only justifiable if it is made available to all interested parties at the right time and provides a realistic aid to decision-making.

Done at Brussels, 28 May 1975.

The Chairman
of the Economic and Social Committee
Henri CANONGE

To. Plastiques Souples Modernes
T. Attached

Opinion on the proposal for a Council Directive on the collection, regeneration and/or destruction of polychlorinated biphenyls (PCB's)

The text referred to the Committee was published in *Official Journal of the European Communities* No C 49 of 1 March 1975, page 1.

A. LEGAL BASIS FOR THE OPINION

On 21 February 1975, the Council referred the abovementioned proposal to the Economic and Social Committee under Article 198 of the Treaty establishing the European Economic Community.

B. OPINION OF THE ECONOMIC AND SOCIAL COMMITTEE

The Economic and Social Committee drew up its Opinion at its 130th plenary session, held in Brussels on 28 and 29 May 1975.

The Opinion is published below.

THE ECONOMIC AND SOCIAL COMMITTEE,

Having regard to the Treaty establishing the European Economic Community and, in particular, Article 198 thereof;

Having regard to the referral on 24 February 1975 by the Council of the European Communities, of the proposal for a Council Directive on the collection, regeneration and or destruction of polychlorinated biphenyls (PCB's);

Having regard to the decision taken by its Bureau on 25 February 1975 instructing the Section for Protection of the Environment, Public Health and Consumer Affairs to draw up an Opinion and a report on the matter;

Having regard to the Opinion adopted by the Section for Protection of the Environment, Public Health and Consumer Affairs on 13 May 1975 and the oral report made by the Rapporteur, Mr Jaschick;

Having regard to the discussions at its meeting on 28 May 1975 (130th plenary session of 28 and 29 May 1975),

HAS ADOPTED THE FOLLOWING OPINION

by a unanimous vote:

Subject to the following comments, the Committee approves the aims set out in the Commission's proposal.

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1. General comments

1.1. The proposal lays down special provisions dealing with particularly dangerous wastes, and comes within the overall framework of the Council Directive on waste disposal. It is the necessary adjunct to the Directive concerning restrictions on

the marketing and use of certain dangerous substances and preparations, a directive which, *inter alia*, relates to polychlorinated biphenyls (PCB's). The Committee is pleased that the Commission has acted on its recommendation that the provisions covering PCB's should be supplemented as soon as possible (1).

1.2. The Committee considers that the serious threats which these substances pose for the environment make it very desirable indeed to implement as quickly as possible the mandatory provisions covering their disposal. The Committee therefore suggests that the necessary measures to be taken by the Member States in pursuance of the present proposed Directive should at the latest be published and implemented concurrently with the Directive concerning restrictions on the marketing and use of PCB's.

1.3. The Committee would also draw attention to the serious environmental hazard which continues to exist because of the current absence of immediately applicable provisions with respect to the collection and treatment of PCB's.

1.4. Bearing this in mind, the Committee wonders whether it is advisable to limit the scope of the present proposal by confining it to very general provisions, thereby leaving it to the Member States to spell out the details at national level. The Committee believes that the proposal should reflect more of a Community approach, and specify more clearly how its objectives are to be achieved.

1.5. The Committee also considers it advisable to review — at the very latest when a later, more comprehensive Directive on the disposal of various other particularly dangerous wastes is adopted — the present Directive in the light of its fifth recital in order to discover to what extent its fragmentary provisions should be integrated into a more comprehensive concept. The purpose here would be to ensure that holders of dangerous wastes do not lose sight of the relevant provisions because they are inundated by a wave of specific solutions for other related problems.

1.6. From a general point of view, the Committee would stress the advisability of promoting the use, as far as possible, of substitutes for PCB's, particularly in the manufacture of products (for example, small condensers) which have proved very difficult to collect and may therefore escape the proposed provisions.

1.7. As regards the implementation by Article 5 of the 'polluter pays' principle, the Committee approves the proposed wording, especially in view of the fact that it conforms to the standpoint expounded by the Committee in its Opinion on the proposal for a Directive on the disposal of waste oil (2).

2. Specific comments

2.1. *Article 1*

2.1.1. The Committee calls upon the Commission to check whether the proposed Directive completely covers the entire PCB field and to ensure that there are no other compounds which should also be covered.

2.2. *Article 3 (2)*

2.2.1. The Committee sees a certain contradiction between, on the one hand, the provisions of Article 2, which imply a general ban on the uncontrolled discharge, dumping and deposit of objects containing PCB's and, on the other hand, an obligation which in certain language versions appears to cover only recovery of reutilizable PCB's from equipment.

2.2.2. In order to avoid any element of uncertainty and to ensure conformity between Article 3 and the general rules set out in Article 2, the Committee proposed that Article 3 (2) be amended as follows:

> 'The Member States shall take the necessary measures to make compulsory the removal and collection of waste PCB's and of PCB's contained in equipment no longer in use, whenever this is technically possible'.

2.3. *Article 8*

2.3.1. The Committee suggests that, for the reasons given in the general comments, this Article should be amended to read:

> 'The Member States shall bring into force the measures necessary to comply with this Directive, not later than 1 October 1976, and shall

(1) OJ No C 16, 23. 1. 1975.

(2) OJ No C 125, 16. 10. 1974.

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forthwith inform the Commission thereof'.

2.4. *Article 9*

2.4.1. Article 9 states that the Member States are to inform the Commission of all proposed laws, regulations and administrative provisions in the relevant field. The Committee would stress that the purpose of this stipulation is to allow the Commission to act to prevent disparities between such proposals.

Done at Brussels, 28 May 1975.

The Chairman
of the Economic and Social Committee

Henri CANONGE

Opinion on the proposal for a Council Decision establishing a common procedure for the preparation and constant updating of a European inventory of sources of information on the environment

The text referred to the Committee was published in *Official Journal of the European Communities* No C 134 of 16 June 1975, page 114.

A. LEGAL BASIS FOR THE OPINION

On 17 March 1975, the Council referred the abovementioned proposal to the Economic and Social Committee under Article 198 of the Treaty establishing the European Economic Community.

B. OPINION OF THE ECONOMIC AND SOCIAL COMMITTEE

The Economic and Social Committee drew up its Opinion at its 130th plenary session, held in Brussels on 28 and 29 May 1975.

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The Opinion is published below.

THE ECONOMIC AND SOCIAL COMMITTEE,

Having regard to the Treaty establishing the European Economic Community, and in particular Article 198 thereof;

Having regard to the referral on 20 March 1975, by the Council of the European Communities, of the proposal for a Council Decision establishing a common procedure for the preparation and constant updating of a European inventory of sources of information on the environment;

Having regard to the decision taken by the Bureau of the Economic and Social Committee on 18 March 1975 in anticipation of an imminent referral, instructing the Section for Protection of the Environment, Public Health and Consumer Affairs to draw up an Opinion and a report on the matter;

Having regard to the Opinion adopted by the Section for Protection of the Environment, Public Health and Consumer Affairs to draw up an Opinion and a report on the matter;

Having regard to the Opinion adopted by the Section for Protection of the Environment, Public Health and Consumer Affairs at its meeting on 13 May 1975;

Having regard to the discussions at its meeting on 28 May 1975 (130th plenary session of 28 and 29 May 1975),

HAS ADOPTED THE FOLLOWING OPINION

by a unanimous vote:

The Economic and Social Committee approves the proposal, subject to the following comments.

1. The Committee applauds this initiative of the Commission, which is taken under the European Communities programme of action on the