



a toxics-free future

26 September, 2017

Mercury Waste Thresholds Intervention for Mercury Treaty COP1

Given by Lee Bell

Thank you Chair.

The Convention has stipulated under Article 11 that the COP will define relevant thresholds for mercury waste.

IPEN is of the view that the establishment of strong mercury waste thresholds by the COP is of critical importance to the effectiveness of the Convention in reducing global mercury pollution. If weak thresholds are adopted, vast amounts of contaminated wastes, soils and sediments will remain outside of environmentally sound management frameworks, poisoning ecosystems and prolonging human exposure.

The Convention requires that three forms of mercury waste require definition thresholds and IPEN suggests that parties consider the following approach.

For mercury waste consisting of mercury or mercury compounds (which refers to commodity grade mercury);

IPEN proposes that mercury at or above 95% purity that is not destined for sale for allowable uses under the treaty should be deemed mercury waste and sent for permanent disposal with the proviso that waste containing elemental mercury below 95% purity should be deemed “waste contaminated with mercury” to avoid loopholes that allow low purity mercury waste to avoid regulation under the convention.

For waste containing mercury or mercury compounds such as mercury-containing discarded products like thermometers, CFLs and batteries, no threshold limit should apply and these articles should be deemed “mercury waste” until all mercury has been removed or recovered from the discarded article.

For a definition of **waste contaminated with mercury or mercury compounds**, all waste contaminated with mercury at a concentration of more than 1 ppm should be deemed “mercury waste.” This is critical to ensure that substances such as contaminated soil and sediment removed from contaminated sites is defined as mercury waste and subject to environmentally sound management.

No mercury waste should be defined by leachate thresholds as has been proposed by some parties and others as this presupposes landfill disposal which is not an environmentally sound management technique. Incineration and landfill of mercury waste should be prohibited to prevent further mercury emissions and releases.

Finally, if an intersessional expert group is established to further consider these matters, it should be open to full participation by expert representatives of civil society and NGO groups.

Thank you.