

IPEN Intervention Article 4 Storage  
Mariann Lloyd-Smith

Thank you Mr. Chair,

We acknowledge that all regions will need to have storage capacity in place to remove excess mercury supply from the market in order to prevent cheap excess mercury from becoming available for inappropriate uses. These uses could include sectors such as ASGM where legal restrictions on mercury use may be difficult to enforce. We also consider that mercury that is not destined for a exempted use should be viewed as waste.

We appreciate that the draft elements document requires Parties to manage mercury consistent with a guidance document on environmentally sound storage and calls for such a guidance document to be adopted by the COP at its first meeting. Currently, the INC has not yet had the opportunity to consider a workable and internationally agreed definition of Environmentally Sound Storage for mercury.

The issue is so essential to the successful implementation of the treaty it may need to be considered by an expert group tasked to complete its work prior to the first COP. Yet still a definition will need to be contained in the Convention text so that when governments adopt the new treaty, they will know what it is that they are adopting. Therefore, IPEN thinks it would be very useful for the INC to establish a contact group to begin the work on discussing the Environmentally Sound Storage of mercury.

A further issue that will need to be considered by the INC in regards to ES storage is the application of polluter pays principle as well as the need for the application of the Principle 10. This would require the involvement of the community in the siting of mercury storage sites, the transport of mercury and the provision of public information. These issues could also be addressed by countries in a national action plan as part of their national implementation plan, which would be subject to compliance measures and therefore supported by the financial mechanism. .