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IPEN intervention on waste thresholds

Given by Lee Bell

Thank you, Mr. President,

The task of defining mercury wastes is highly important and will shape future management plans for these hazardous substances for decades to come. The expert group has been considering this issue and made significant progress to date, but there are many issues to be resolved. The three categories of mercury waste being considered, waste consisting of mercury, waste containing mercury and waste contaminated with mercury, are all important to review, but one waste group requires prioritisation in terms of threshold development. This is the category of waste contaminated with mercury. This category may include industrial waste, sludges, soils, oil and gas waste, and take many other forms as well.

It is this group of waste that represents one of the most significant risks in terms of human and environmental exposure, and establishing a threshold to define it can lead to much tighter controls on its fate and removal from the environment. However, if the threshold levels that are proposed are weak, than a great deal of mercury will escape environmentally sound management and continue to pollute our environment and result in human exposure.

That is why the expert group must strive to develop threshold levels for waste contaminated with mercury that are strict and ensure that the mercury contaminated waste is captured within a system of environmentally sound management on a global basis. IPEN recommends establishing a threshold of 1 ppm for waste contaminated with mercury. There is a proposal to establish waste thresholds for this category based on leachable values. This should not be accepted by the COP as leachable values for mercury waste can only mean that the waste is destined to be sent to landfill. Landfilling of mercury waste is not an environmentally sound management practice and should be avoided, as it simply creates more contaminated sites and repeats the cycle of groundwater, soil and air pollution. While strict thresholds should be established for this category, we should also ensure that analytical methods are promoted that allow regulators in all regions to accurately identify substances above the thresholds.

While waste consisting of mercury is relatively easy to identify, we must ensure that elemental mercury that is contaminated with other materials and of lower purity than 95% is classified as waste contaminated with mercury.

For waste containing mercury, which is essentially end of life products, identification would be greatly enhanced by ensuring uniform labelling measures that identify products containing mercury. There should also be a provision to change the status of such materials once the mercury has been removed to allow recycling of the non-hazardous components of the article.

Finally, we must make every effort to ensure that once a system of mercury waste identification is established, management systems for the waste do not permit environmentally unsound outcomes. For that reason, incineration and landfilling of mercury waste must be avoided.

Thank you.