



Current mercury situation in Lebanon

1- Preliminary gap analysis of existing law vis a vis treaty requirements:

Article and para Minamata Convention MC	Impact of MC provision	Lebanese legislation addressing the provision (obligation)	Compliance / Non-compliance
3(3)	Ban on new mercury mining	None	Non-compliance
3(4)	Ban on existing primary mining	NA	NA
3(5)	Identification of mercury stakes	None	Non-compliance
3(6)	Ban of mercury export	None	Non-compliance
3(8)	Ban of mercury import	None	Non-compliance
4(1)	Prohibition of manufacture/import/export of mercury-added products (Annex A, Part I)	None	Non-compliance
4(3)	Measures with respect to mercury-added products (Annex A, Part II)	None	Non-compliance
4(5)	Preventing the incorporation of mercury-added products in assembled products	None	Non-compliance

4(6)	Obligation to "discourage" manufacture and distribution of new products	None	Non-compliance
5	Manufacturing processes in which mercury or mercury compounds are used	NA	NA
7	Artisanal and small-scale gold mining	NA	NA
8(3)	Controlling emissions: Develop a national plan	None	Non-compliance
8(5)	Emission control measures for existing sources	Resolution No 8/1 , 2001 Specifications and standards relating to air pollutants and effluents	Compliance not determined
8(7)	Establish emissions inventory	None	Non-compliance
9(4)	Releases control	Resolution No 8/1 , 2001 Specifications and standards relating to air pollutants and effluents	Compliance not determined
10(2)	Storage of non-waste mercury	None	Non-compliance
11(3)	Mercury waste	Law No 64, issued 12/08/1988, protection of the environment against pollution by hazardous waste and hazardous materials. Law No 387, issued 04/11/1994, permit to the government to ratify the Basel convention on the control of movement of hazardous waste	Not determined compliance

12(1)	Contaminated sites	None	Non-compliance
16(1)	Health aspects	Different standards in: Water, effluents, emissions	Not completed

2- Legal obligations imposed by the convention, and needed new related legislation in Lebanon to be prepared

The convention requires parties to:

- a. Ban primary mercury mining (Article 3), in Lebanon no mercury mining.
- b. Comply with an international consent regime for import and export of mercury and specific mercury mixtures (Article 3), in Lebanon we need to prepare a decision to comply with this obligation.
- c. Take appropriate measures to phase out, by 2020, the import, export and manufacture of specific types of products that contain mercury, and to discourage new mercury products without environmental or health benefits. The list of products includes particular batteries, switches, relays, lamps, cosmetics, pesticides and biocides, topical antiseptics, and measuring devices (such as thermometers, and sphygmomanometers) with feasible alternatives (Listed products). Parties must also take certain measures towards dental amalgam (Article 4, Annex A). Lebanon have to prepare decisions related to these products.
- d. Take appropriate measures to control and phase out specific manufacturing processes that use mercury, take measures to control mercury releases from those facilities, and discourage new processes without environmental or health benefits (Article 5, Annex B). Till now no manufacturing processes that use mercury in Lebanon, but it is good to prepare a decision in this aspect.
- e. Take steps to reduce and where feasible eliminate artisanal and small-scale gold mining that uses mercury (Article 7, Annex C). In Lebanon there is no artisanal and small scale gold mining activities.
- f. To take measures to control mercury emissions from specific types of existing facilities (Facilities mentioned in the convention), including inventories of emissions. These Facilities are coal-fired power plants and industrial boilers, smelting and roasting processes for lead, zinc, copper, and industrial gold, waste incineration facilities, and cement clinker production facilities. If a new Facility opens later than 5 years after obligations entered into force, that facility must use "best available techniques and best environmental practices" for mercury emissions (Article 8, Annex D). In Lebanon some of these facilities exist currently. A decision related to this Article is needed to be prepared.
- g. Take measures to control releases to land and water from sources that are significant and not controlled by other parts of the Convention, including inventories of releases (Article 9). A related decision must be prepared in Lebanon.
- h. Take measures to ensure environmentally sound storage of mercury, specific mercury mixtures, and specific mercury compounds, and cooperate to enhance capacity building to meet this obligation (Article 10). A related decision must be prepared in Lebanon.

- i. Take appropriate measures to manage in an environmentally sound manner specific waste consisting of, containing or contaminated with, mercury or general mercury compounds, only recover mercury for allowed uses, and import and export mercury wastes in accordance with international rules such as the Basel Convention (Article 11). A related decision must be prepared.
- j. Endeavour to develop appropriate strategies to identify and assess mercury-contaminated sites, and manage the sites in an environmentally sound manner (Article 12). Till now no mercury-contaminated sites exist in Lebanon.
- k. Provide, within Lebanon's capacities, resources to implement the Convention in accordance with national policies, priorities, plans and programmes (Article 13). Including the implementation of the convention in the governmental plan and strategy.
- l. Cooperate to provide, within Lebanon capabilities, capacity building and technical assistance, and promote and facilitate technology transfer and access (Article 14).
- m. Promote and facilitate the exchange and public dissemination of information on mercury and general mercury compounds, as well as endeavouring to cooperate on research (Articles 17 to 19).
- n. Report to the Conference of the Parties on measures taken to implement the Convention (Article 21).

3- The presence of mercury in current legislation and decisions

Mercury as waste or contaminant exists in some decision in Lebanon related to import and export of waste, and to acceptable levels in different medium as pollutant and contaminant.

- 4- Decision 71/1 issued in 19/5/1997, organizing the import of waste and amendment of decision 22/1 issued 17/12/1996. In this decision, the list 2, the waste prohibited to import to Lebanon, we find "waste and residues of mercury" under number of harmonized system 2805.40.
- 5- Decision 52/1 issued in 12/9/1996, on standards and acceptable levels of pollutants of air, water and soil. For the drinking water, the limit of mercury is 05 – 1 microgram/liter. For the effluents in water bodies and the sea or soil, the limit of mercury is 0.005 mg/l. For the emissions from waste incinerators, the limit of mercury is 0.2 mg/m³.
- 6- Decision 8/1 issued 1/3/2001 on emissions and releases from industrial facilities and wastewater treatment plants. The limit in emissions to the air is 1 mg/m³. The limit for releases to the sea is 0.05 mg/l. The limit for releases to the superficial water is 0.05 mg/l. The limit for wastewater released to the sewage system is 0.05 mg/l.

4- Needed additional legislation related to the obligations of the convention:

- 7- Some obligations in the convention need regulation to confirm the banning of primary mercury mining and manufacturing processes that do not take place in Lebanon.
- 8- A regulation is needed to establish a permit process for import and export of mercury and specific mercury mixtures, to phase-out import and export of the listed products in the convention, and to ensure mercury wastes are exported for recovery only when consistent with the convention.

5- A new legislation and regulation is needed to confirm:

- 9- Ban new mercury mining and specific manufacturing processes that use mercury.

- 10- Establish a permit function for import and export of mercury and specific mercury mixtures.
- 11- Restrict import, export and manufacture of the Listed Products by the selected phase-out dates, and monitor other uses of mercury that may lead to manufacture of new mercury products and processes.
- 12- Ensure that mercury waste is exported for recovery only when consistent with the convention.

Other obligations would be implemented by the ministry of environment and other concerned authorities, national reports, financial resources, capacity building and technical assistance.

6- Use in Lebanon of the listed products to be phased-out under the convention

Type of specified products	Use in Lebanon to be phased-out
Batteries	Mercury oxide batteries and zinc air batteries with a mercury concentration greater than 2%. These batteries are being phased out in favor of newer alternatives.
Switches and relays	There is an indefinite exemption for switches and relays where no feasible alternative exists.
Lamps – CFLs and LFLs	This category is primarily mercury-containing energy saver light bulbs (“CFLs”) and fluorescent tube lights (“LFLs”), with mercury contents above certain thresholds.
Lamps – HPMVs	High pressure mercury vapor lamps are primarily used domestically in street lights
Lamps – CCFLs and EEFLs	These lamps are primarily found in liquid crystal display (“LCD”) screens in televisions and computers.
Certain mercury containing cosmetics	Cosmetics containing mercury are not yet banned in Lebanon.
Pesticides, biocides and topical antiseptics	There are no mercury pesticides or biocides registered in Lebanon.
Electronic measuring devices with feasible mercury-free alternatives	Used in hospitals and other medical care facilities, the meteorological service and calibration facilities in Lebanon.

7- Lebanese facilities listed for emissions under the convention

Specified emission sources	Facilities in Lebanon
Coal-fired power plants	There is no in Lebanon coal-fired power plants
Coal-fired industrial boilers	There is no in Lebanon coal-fired industrial boilers, but there is one facility with coal-fired melting metal kiln
Smelting and roasting processes used in the production of: 13- Lead, 14- Zinc,	There is no in Lebanon these kind of industry

15- Copper, and 16- Industrial gold.	
Waste incineration facilities	There is some medical waste incinerators working illegally. To this moment no exist permitted waste incinerator
Cement clinker production facilities	There is 4 cement clinker production facilities in Lebanon. 3 in Chekka region in North Lebanon and 1 in Sibline in Mont-Lebanon region.