

Response to information request in decision MC-2/3

Information from Norway to identify potentially relevant point source categories of releases for which draft guidance on methodologies for the preparation of inventories should be developed

The definition of relevant source of releases

Firstly, we will provide some comments to the definition of a relevant source of releases. A relevant source of releases to land or water is defined in article 9(2) b as "*any significant anthropogenic point source of release as identified by a Party that is not addressed in other provisions of this Convention*".

A **significant** anthropogenic point source of releases as identified by a Party: The scope of article 9 is limited to a significant anthropogenic point source of releases as identified by a Party. We understand "*significant*" as a qualifier to limit the point sources for which a Party will need to implement control measures. There is a similar qualifier in article 8 which reads "*...to include at least 75 percent of the emissions in each of the source categories in article 8*".

A potential point source for which we are to develop guidance on methodology for preparing inventory of releases should not be limited to sources that are significant because this may differ from one Party to another.

A **point source** is not defined in the Convention. In Norway, a point source is in general considered as the end of a pipe or discharge from a factory. It may be stationary locations or fixed facilities from which pollutants are discharged. The opposite of a point source is a diffuse source, which is a source that is caused by a variety of activities that have no specific point of discharge.

A point source **not addressed in other part provisions of the Convention**: We will in the following present a short analysis of which other provisions of the Convention that address releases of mercury or not.

Article 3 Mercury supply sources and trade: Existing primary mercury mines are only allowed for a period of up to 15 years after entry into force of the Convention for a Party. Releases to land and water from mercury mines in this period are not addressed in article 3. Nor are releases from individual stocks of mercury, however, we must assume that stocks are in interim storage (cf. article 10). Recycling of mercury from chlor-alkali factories is not allowed, thus releases from this supply source is addressed. To sum up we find that releases from primary mercury mining are not addressed in other provisions of the Convention.

Article 4 Mercury-added Products: The production of products with a final phase out date within a few years, have addressed releases from production. However, releases from the production of products that will continue to be in production with a concentration limit of mercury, are not addressed in article 4. For dental amalgam in part II of annex A, a Party has the option to choose, out of nine measures, to promote best environmental practice to reduce releases. As such, we do not find that mercury releases from dental practices are addressed.

To sum up, we find that mercury releases from the production of button zinc silver oxide batteries and button zinc air batteries; switches and relays exempted from the phase out date; compact fluorescent lamps; CCFLs and EEFLs; non electronic measuring devices installed in large scale equipment or those used for high precision measurement; and releases from the use of dental amalgam, are not addressed in other provisions of the Convention.

Article 5 Manufacturing processes in which mercury or mercury compounds are used: Each Party are obliged to address releases of mercury from the manufacturing processes listed in annex B according to article 5(5) a. We find that mercury releases from the manufacturing process listed in Annex B are addressed in article 5.

Article 7 Artisanal and small-scale gold mining: Each Party that has artisanal gold scale gold mining and processing (ASGM) in accordance with article 7 are obliged to address releases, in accordance with article 7(2). We find that mercury releases from ASGM are addressed in article 7.

Article 8 Emissions: Article 8 deals with emissions of mercury to air. This article does not deal with releases of mercury to land and water. The guidance on BAT/BEP for emissions to air mentions the potential for cross-media effects, but it does not deal with BAT/BEP for releases to land and water. We find that mercury releases from the sources in article 8 are not addressed in in other provisions of the Convention.

Article 10 Environmentally sound interim storage of mercury, other than waste mercury: The releases of mercury from environmentally sound interim storage of mercury, other than waste mercury, are dealt with in the Guidelines on the environmentally sound interim storage of mercury other than waste mercury.

Article 11 Mercury Waste: Releases of mercury to land and water from waste are to a certain degree addressed by the requirement of environmentally sound disposal of waste. The Basel Convention guideline describes what is environmentally sound management of mercury waste. The guidelines address handling of mercury waste that is collected and sent for disposal. A more in-depth analysis of how the guideline address releases of mercury from waste handling is needed. For instance, we do not find the guidelines to deal with BAT/BEP for discharge of wastewater or process water from industry. Furthermore, the guidelines present technologies for recycling of mercury waste, but it does not deal with reduction of releases from industries that recycles mercury waste. To sum up, we do not find that article 11 deal with discharge of wastewater or process water from industry, nor releases of mercury from industries that recycle mercury waste.

Information on the interface between waste and releases: There may be certain scenarios where the distinction between waste and point source releases are difficult to determine, and where there is a risk that mercury pollution may be moved from one compartment to another. As part of the work on releases, these scenarios must also be considered.

Potentially relevant point source categories of releases

Norway believes that the following point source categories of releases are relevant for which draft guidance on methodologies for the preparation of inventories should be developed:

Identified national sources (current releases ≤ 2 kg/year per factory¹):

- Production of titanium dioxide
- Pulp and paper industry
- Oil refining and processing of natural gas

¹ These are sources that represent small volumes today (≤ 2 kg/year per factory), but that historically, prior to regulation and reduction measures have been far more significant. Several of these sources may still be significant sources in countries that have not yet regulated and/or managed such releases.

- Production of titanium dioxide slag and pig iron
- Production of non-ferrous: zinc and cadmium and ferromanganese/silicomanganese
- Waste incineration
- Municipal sewage
- Landfills

Source categories identified in draft global mercury assessment:

- Production of non-ferrous metals
- Production of mercury metal
- Production of gold from large scale mining
- Oil refining
- Municipal wastewater
- Coal fired power plants
- Coal washing
- Production of products without an exemption date
- Dental facilities that use dental amalgam
- Recycling of mercury

Other sources of information on potentially relevant point sources of releases:

- UN Environment's Toolkit for identification and quantification of mercury releases
- Mercury Initial Assessments
- National inventories
- Other Guidance documents