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Interim secretariat of the Minamata  
Convention on Mercury, Chemicals Branch  
Division of Technology, Industry and  
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Programme

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Dear UNEP Colleagues,

CEMBUREAU would like to thank you for the opportunity to provide comments to the excellent draft guidance that the group of technical experts has developed on best available techniques and on best environmental practices on mercury for cement clinker production facilities.

As an active member of the UNEP Global Mercury Cement Partnership, our assessment has been carried out in liaison with the Partnership lead WBCSD Cement Sustainability Initiative, who will send comments in more detail on the same points outlined here:

1. The Minamata convention is concerned with overall releases of mercury to the environment and its monitoring provisions specify yearly reporting; it would seem that a longer timeframe (e.g. 30 days) for determining BAT/BEP is appropriate, rather than a daily average.
2. The justification for the 0.03 mg Hg/Nm<sup>3</sup> the associated level of BAT is based on emissions from a sub-set of plants that can achieve this low emission level due to their raw materials rather than a specific abatement technique.
3. There are discrepancies in the cost of installing abatement equipment (e.g. bag filter and sorbent injection).
4. On the multi-pollutant control measures:
  - a) Mercury reduction in wet scrubbers at cement kilns may vary widely from case to case. The levels of up to 80% of mercury removal for a referenced set of plants are certainly not achieved by other plants with high elemental mercury (reportedly less than 20% mercury removal). Such results are usually not published though.
  - b) Extensive research is currently carried out to proof the applicability of Selective Catalytic Reduction (SCR) technology in the cement industry. The high dust levels impose high demands on the durability and the operation of the catalysts and the design and chemical composition of the catalysts are very important, thus the various types of catalysts for SCR being used in the cement industry are still under development.

5. Especially less industrialized countries may be lacking in the required technological support by the (mostly European or US) analyzer suppliers and the necessary specific expertise in the cement industry on continuous emission monitoring. Therefore mass balance is the more appropriate approach in those countries.
  
6. **It is CEMBUREAU view that the recommended ELV be left up to each Member State to decide based on its own country level specifics, rather than incorrectly stating that the associated technologies can achieve this ELV in all parts of the world with many different specificities.**

We are pleased to hear that the expert group will take these into account, and we look forward for the final draft of the guidance and its adoption at the 7<sup>th</sup> Intergovernmental Negotiations Committee.

We are confident that the UNEP guidance will be a most relevant tool to support the actions of the UNEP Global Mercury Cement Partnership and help bring mercury emissions down from the cement industry worldwide.

Best regards,

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