

Comments from the Research and Education Centre for Development (CREPD)

On the developing draft guidance on best available techniques and best environmental practices (BAT/BEP) for controlling and where feasible reducing mercury emissions to the atmosphere, as set out in Article 8 of the Minamata Convention on Mercury

General Comments

The completeness of the processes and techniques included in the guidelines and the comprehensiveness of their description are well addressed, however, the potential usefulness of the draft in guiding Parties in selecting and implementing BAT and BEP in their circumstances is not fully addressed because while controlling or reducing mercury emissions from point sources (facilities listed in Annex D of the Convention); it is critically important to equally address the releases to soil and water that are secondary sources of mercury emissions to the atmosphere. If this is missing, Parties may just take measures to address exhausted gases and neglect how the mercury-contaminated ash residues are disposed in environmentally sound manner.

Specific comments on:

- **Introduction**

Section 1.7 on cross cutting issues

There is no text on cross cutting consideration on waste management. It would be co-benefit for the Minamata Convention to transpose and adapt the excellent text on POPs waste management from the Stockholm Convention's BAT/BEP guidelines.

- **Waste incineration part**

There is unbalanced presentation of information between incineration technologies and non incineration technologies. A balance is important to ensure that the guidance document on BAT/BEP will effectively guide ALL the Parties in selecting and implementing BAT/BEP in their circumstances. For the developing countries facing challenges in securing a sufficient power supply to "run incinerators" properly, and considering the size of inferred mercury contaminated wastes generated compared to industrialized world, it is important that information on specific alternative technologies be included at least in the annex to the Guidelines.

- **Cement kilns**

There should be a clear and common understanding of the difference between mercury emissions/releases from cement kilns that burn waste (co-incinerate waste) and cement kilns which do not burn wastes. So far this is not clear from the proposed document.

You can also highlight the importance of content of mercury in sewage sludge which is not enough carefully mentioned in that section

- **Coal-fired Power Plants and Coal-fired Industrial Boilers**

- 3.3.1 Coal blending*

This statement “Blending bituminous coal with subbituminous coal provides the double benefit of higher chlorine concentration and lower alkalinity. In the context of mercury control, the objective of coal blending would be to increase halogen concentration by mixing relatively high halogen content coal with low halogen coal that might be used at the plant” may infer that there will be an increase potential for the formation and release of unintentional POPs (dioxins and furans). It may be useful to see in the document how this category of pollutants is simultaneously controlled.

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