

Dear Sir,

Please find below comments to the draft BAT/BEP Guidelines on mercury.

1. BAT/BEP Guidelines on mercury lack information about alternatives to waste incineration. It is important to develop an Annex to this document that will highlight non-combustion destruction technologies as alternatives to incineration and thus will meet the needs of developing countries and countries in transition which do not have this information available. These countries rely of the GEF for project support. As it is stated in the GEF-6 Chemicals and Waste Strategy, "Demonstration and validation for new, environmentally-sound, and climate-resilient technologies will be encouraged". Examples of cutting-edge technologies include non-combustion destruction technologies. More detailed text about available alternatives to waste incineration (probably as Annex to the part on Waste Incineration) will provide countries with valuable information resource that will help them apply to the GEF for projects on BAT/BEP for sound waste management.
2. BAT/BEP Guidelines note that the best available techniques include appropriate selection of site. Though nothing is said about the process of site identification. The social, health and environmental consequences should be considered during the identification of the site. Ignoring of these consequences could result in public opposition and project cancellation. Very often governments chose sites in already contaminated areas which increases health and environmental risks. Good infrastructure should not become the only prerequisite for site selection.
3. BAT/BEP Guidelines correctly states the need of having dedicated landfills for a safe sink of ash. However it does not mention the problem of using waste incineration residues which contains dioxins, chlorides, heavy metals and other hazardous substances, in construction materials which is a big threat for all countries and especially for developing and transition economies that lack capacity of identifying hazardous chemicals in products or construction materials.
4. BAT/BEP Guidelines should pay attention to the cross-medial effects with regards to other conventions such as the Stockholm Convention on POPs. There is evidence that not only polychlorinated dioxins and furans are persistent and toxic but also polybrominated dioxins as demonstrated e.g. in van den Berg, M., et al. (2013). "Polybrominated Dibenzo-p-dioxins (PBDDs), Dibenzofurans (PBDFs) and Biphenyls (PBBs) - Inclusion in the Toxicity Equivalency Factor Concept for Dioxin-like Compounds." Toxicological Sciences. We are surprised that this is not reflected when use of bromine is suggested in combustion processes, or in activated carbon in the phase when dioxins and furans can occur due to de-novo synthesis. We suggest the inclusion of the warning about potential formation of PBDD/Fs when bromine is used in the technology, in cement kilns and coal power plants in particular.
5. We believe that BAT/BEP Guidelines should be useful for decision makers who will benefit from inclusion of basic guidance about steps needed to be taken to avoid mercury releases to air from waste incineration. Such guidance can be in cross cutting considerations on waste where there is no text inserted. It can be easily copied from BAT/BEP Guidelines of the Stockholm Convention on POPs which contain a similar chapter. We think the principles are the same. It makes sense to

have such a chapter in common cross cutting section as those suggestions are related to cases when waste is co-incinerated in cement kilns and/or power plants. We are sending the text from the Stockholm Convention attached. Application of such guidance in CEE countries lead to significant reduction of pollutant releases to air including mercury.

Annex to these comments: Part of the Stockholm Convention BAT/BEP Guidelines on waste.