

Minamata Convention on Mercury

Submission from Brazil: request of information in support to further work of the Intergovernmental Negotiating Committee in its preparation for the early implementation of the Minamata Convention on Mercury, as well as for the first meeting of the Conference of the Parties.

1. The Government of Brazil welcomes the opportunity to submit its views in relation to the ongoing work to develop further guidance under Articles 3, 7, 10, 11 and 22 of the Minamata Convention on Mercury, to be considered by INC-7.

Article 3 – Mercury supply sources and trade

2. According to Article 3 of the Minamata Convention, Parties shall endeavor to identify individual stocks of mercury or mercury compounds exceeding 50 metric tons, as well as sources of mercury supply located in their territory generating inventories exceeding 10 metric tons per year. Paragraph 12 states that the Conference of the Parties shall, at their first meeting, provide further guidance with respect to this article, particularly in relation to paragraphs 5(a), 6 and 8, and should develop and adopt the required content of the certification referred to in paragraphs 6(b) and 8.

3. For the identification of stocks, the Brazilian Government recommends that the guide includes definitions of mercury and mercury compounds, in particular the six compounds listed under the Convention. The guide may also include a list of *potential* types of: installations containing mercury (not limited to those listed in Annex D of the Convention), manufacturing facilities of products with added mercury (not limited to those listed in Annex A of the Convention), mercury production facilities employed in industrial processes (not limited to those listed in Annex B of the Convention), as well as mercury waste treatment facilities, government agencies that may deal with apprehension of illegal mercury or mercury used illegally, as well as agencies involved with authorized uses, such as military storage facilities. In addition, the guide could include methods for measuring the amount of mercury in a determined stock. These methods must take into account existing regional capacity that can be robust and simplified, based on visual inspections.

4. Mercury from decommissioned chlor-alkali plants requires particular attention in the proposed guidelines because this is probably where the largest volumes of mercury are stored. Accordingly, the guide should touch on aspects related to the design and format of the cells to mercury, the technical terms used in industry for mercury and stocks and the degree of decommissioning plants.

Article 7 – Artisanal and small scale gold mining (ASGM)

5. Please refer to the submission on the Draft Guidance Document for Developing a National Action Plan to Reduce, and Where Feasible, Eliminate Mercury Use in Artisanal and Small Scale Golding Mining (ASGM), sent on March 20.

Article 10 – Environmentally sound interim storage of mercury, other than waste mercury

6. The Brazilian Norm ABNT NBR n° 7500/2013 is the technical standard applicable to overland transport, handling, movement and storage of hazardous chemical products in the country. This norm establishes the methodology for identifying dangerous products. It applies to transport units and packs/volumes and indicates risks and precautions associated with such activities.

7. Taking into account the elements of the above mentioned standard, the Brazilian government recommends that the guide for the interim storage of mercury includes the following aspects: definition of what is considered appropriate interim storage, quantity limits, good practices, rules on handling and transport, safety protocols and standards for identification of stocks.

Article 11 – Mercury wastes

8. The norm dealing with mercury levels in waste in Brazil is *ABNT NBR 10004/2004: Solid Waste – Classification*. The norm comprises (i) hazardous waste of non-specific sources, hazardous waste of specific sources, flammable waste, corrosive waste, reagent waste, pathogen waste and toxic waste, all classified as hazardous; (ii) not inert and inert, which are classified after solubility tests.

9. The classification of waste involves the identification of the process or activity that originated it, as well as its components and characteristics. The components are then compared with waste and substance lists for which impacts on human health and the environment are well known.

10. The mere presence of mercury implies that waste will be considered as hazard, including:

- wastewater treatment sludge from the production of vinyl chloride monomer using mercuric chloride as a catalyst in an acetylene-based process;
- brine purification sludge from mercury-cell chlorine production units, where there has been no prior purification of brine;
- sludge from the treatment of liquid effluents arising in the process of production of chlorine on mercury cells;

- liquid effluents from the cleaning phase or caustic materials generated in processes of production of paints;
- mud or dust arising from emission control system of gases used in ink production.
- after-use lamps with vapor mercury are also considered as hazardous waste.
- the presence of some mercury substances, such as phenylmercury acetate and mercury fulminate, in waste implies that it will be considered as hazard and toxic.

11. The maximum concentration of mercury permitted in extracts obtained in assays of leaching is 0.1 mg/L. For solubility trials, the maximum concentration allowed is 0.001 mg/L.

Article 22 – Effectiveness Evaluation

12. Article 22 deals with the conduct of effective evaluation of the Convention, which provides for the survey of monitoring data of mercury in biota and in vulnerable populations.

13. In Brazil, there is existing capacity and availability of data. CETESB¹, the environmental agency of the State of São Paulo, carries out continuous monitoring of matrices such as water, air, soil, sediment and fishes, conducting sporadic surveys also in bivalve mollusks. CETESB is also able monitor mercury in human matrices. Several other research groups hosted mainly in Federal Universities also carry out analysis and research in water, soil, sediment, biota (especially fishes and bivalve mollusks) and air.

14. The design of the Initial Assessment of the Minamata Convention in Brazil, coordinated by the Ministry of the Environment, to be started in 2015, will provide a detailed survey on existing capacity and effective assessment. The project will identify gaps and needs in the country in order to support national implementation of Article 22.

May/2015

¹ CETESB hosts one of the regional centers of the Stockholm Convention for Latin America and the Caribbean.