

Information submitted by Norway in response to the information request to support further work of the INC in its preparations for early implementation of the Minamata Convention on Mercury as well as for the first COP

Article 3 – Mercury supply and trade

Governments and other actors are requested to submit additional information relevant to the development of draft guidance on the identification of individual stocks of mercury or mercury compounds exceeding 50 MT, and sources of mercury supply generating stocks exceeding 10 MT. Drawing on factors in document INC/6.9.

We believe the factors in document INC/6.9 is a good starting point for the guidance on stocks. To add to this, we believe it is important to clarify the terms “individual stocks of mercury and mercury compounds exceeding 50 MT” and “sources of mercury supply that may generate stocks more than 10 MT” in the guideline. We further believe it is important to explain what is to be covered as “stocks” and an “individual stock” in this context. We suggest the following elements and issues should be included in the guidance:

- Include the definition of *mercury* and *mercury compounds* from the convention text (i.e. art. 2(d), art 3.1 (a), art 3.1.(b))
- Include clarification of the scope of “individual stocks of mercury and mercury compounds exceeding 50 MT” and “sources of mercury supply that may generate stocks more than 10 MT”, such as:
 - “individual stocks” must refer to the total quantity of mercury and mercury compounds under the control of an (economic) entity, encompassing i.a. all production facilities, sites etc. under an entity’s control.
 - Parties should endeavour to identify all stocks and stock-generating supplies of both mercury and mercury compounds over the thresholds of, respectively, 50MT stocked at any given time and 10MT produced in total per year.
- Include examples of both “individual stocks of mercury and mercury compounds exceeding 50 MT” and “sources of mercury supply that may generate stocks more than 10 MT”, such as likely types of production facilities, sites, etc.
- We believe that stocks and stock-generating supplies should, in principle, include both materials intended for use and materials not intended for use, to provide a comprehensive picture and to aid in identification of possible and potential sources. Stocks/sources intended for use (available for supply) and stocks/sources not intended for use, should be categorized separately. Stocks and stock-generating supplies not intended for use could include mercury and mercury compounds i.a. at abandoned or decommissioned sites, at disposal sites and mercury not allowable for further use or trade according to national rules or the provisions of the Convention.

For example in Norway, the authorities are managing a site with a wreck of a submarine that was torpedoed and sank off the coast of Norway during the Second World War. It is believed that at the time of bombardment the submarine contained around 67 tons of liquid mercury, stored in carbon steel containers¹.The mercury that remains in the wreck neither is, nor will be, intended for use,

¹ We have carried out extensive analyses and risk assessments on and around the wreck and are considering further action. For more information, see <http://www.kystverket.no/Beredskap/Skipsvrak/U-864/U-864/> and

because Norway has a general ban on the use of mercury, which further entails the proscription of recycling or reuse of mercury. Even so, we consider it to be important to include the mercury at such abandoned sites for a comprehensive overview of mercury located in the country, including materials that could - at the purely physical/chemical/mechanical level - constitute a potential stock or potential source of supply that may generate a stock. We therefore believe it could be useful guidance for Parties to identify all sources of stock and stock-generating supplies, and recommend that Parties categorise separately which stocks/stock-generating supplies are for intended use and which are not for intended use.

- Additionally, closed or decommissioned production facilities could also be a potential source of stocks or stock-generating supplies. We expect that such stocks/supplies would not – in the main – be intended or allowable for reuse. We consider i.a. that mercury and mercury compounds from closed chlor-alkali plants is excess mercury and should be identified as stocks not intended for further use.

- We further suggest including guidance on identifying stocks of mercury accumulated from previous years. And methods to assist in determining quantities of individual stocks of mercury or mercury compounds, such as reporting from production facilities, importers and storage facilities. Additionally, it could be useful to include guidance on how parties can keep records on the amount of stocks, such as keeping a national register or inventory of stocks, in order to have available data for reporting.

Governments and other relevant actors are invited to make submissions regarding whether there are any additional elements within the guidance referred to in paragraph 12 of article 3 not covered by either the guidance on the forms or that of stocks. Governments and other relevant actors are invited to send submissions to the secretariat, including on whether such additional guidance is needed and the nature of that guidance.

At present, we do not have any particular submission on this point. We would, however, suggest that the point can be revisited when i.a. the guidance on the use of the standard forms for consent has been finalised and some experience has been gained on the use of the forms and on the identification of stock.

Article 7 – ASGM

Re: ... the preparation of guidance on the development of national action plans on artisanal and small-scale gold mining, Governments with experience in drafting national action plans are encouraged to submit comments on their experiences.

Norway does not have any experience with ASGM activities and accordingly no relevant examples of or experiences with national action plans for ASGM.

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

Governments are requested to provide the secretariat with information on sound mercury interim storage practices that they have adopted and successfully implemented. The secretariat will then

prepare, for consideration by the committee at its seventh session, a compilation and summary of the information provided by countries.

Norway do not have relevant examples on practices on interim storage of mercury, other than waste mercury.

Article 11 – Mercury waste

Governments are requested to provide to the secretariat information on their use of mercury waste thresholds and the levels established. The Secretariat will then compile such information for consideration by the committee at its seventh session.

In Norway, we do not have a definition of mercury waste. Waste containing mercury or mercury compounds with the concentration of 0, 1 percent or more is regulated as hazardous waste and covered by the regulations on hazardous waste. According to the regulations, hazardous waste must be sorted at source and handled separately from other wastes.

More information on our requirements for hazardous waste is available here:

<http://www.miljodirektoratet.no/no/Regelverk/Forskrifter/Regulations-relating-to-the-recycling-of-waste-Waste-Regulations/Chapter-11-Hazardous-waste/>

Article 22 – Effectiveness evaluation

Governments and relevant organizations are requested to provide information on the availability of monitoring data. The secretariat will then prepare a compilation and analysis of the means of obtaining monitoring data for consideration by the committee at its seventh session, with an emphasis given to the capacity-building needs of developing countries and countries with economies in transition; to the role played by regional activities, and to the value of partnerships.

The National Institute of Nutrition and Seafood Research has monitoring of Hg in fish and sea food:

http://www2.nifes.no/index.php?page_id=137&lang_id=2

All of the monitoring programs under the Norwegian Environment Agency include mercury:

1. Contaminants in coastal waters (Hg in marine biota)
2. Riverine inputs and direct discharges (Hg in river water)
3. Contaminants in urban fjords (Hg in biota, sediment and water)
4. Contaminants in terrestrial and urban environment (Hg in biota)
5. Contaminants in lakes (Hg in biota)
6. Monitoring og long range transported contaminants (Hg in air, moss and precipitation)

Link to programs

<http://www.miljodirektoratet.no/no/Tema/Miljoovervakning/Naturovervakning/Giftritt-miljo/>

We would like to add that we believe guidance on monitoring methodology may be needed at some later stage.

We would also like to mention an emerging issue of possible concern where studies seem to indicate possible increasing concentrations of MeHg in fish despite reduced Hg inputs or deposits. Further capacity building on this issue may be needed.