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21 December B.E. 2559 (2016)

Dear The Principal Coordinator, Interim Secretariat of the Minamata Convention on Mercury

Subject: Views on Technical Issues related to the specific aspects of Article 7, 11 and 12

Please kindly refer to the messages from Interim Secretariat of the Minamata Convention on Mercury, inviting government and other interested stakeholders to comment the technical issues related to the specific aspects of Article 7, 10, 11, 12 and 22 in response to the requests made at the seventh session of the INC held at the Dead Sea, Jordan from 10 to 15 March 2016.

After consulting with relevant stakeholders, The Pollution Control Department, Royal Thai Government is pleased to submit our views on the above mentioned subject as enclosed herewith.

Please be assured of our full cooperation.

Yours sincerely,

Suwan Nanthasart

(Mr. Suwan Nanthasarut)

Deputy Director General

Pollution Control Department

Enclosure: As stated.

The Principal Coordinator, Interim secretariat of the Minamata Convention on Mercury,
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Views on Technical Issues related to the specific aspects of Article 7, 11 and 12**Views on Article 7 – Artisanal and Small-Scale gold mining (ASGM)**

(1) Draft guidance on developing a national action plan to reduce and, where feasible, eliminate mercury use in artisanal and small-scale gold mining

(1.1) Chapter 4: Steps for Developing National Action Plan (NAP). NAP should be developed with the participation from local people, public, and relevant stakeholders in each step.

(1.2) Chapter 5: Contents of the National Action Plan. It should add the step of preparedness of the target area with a certain timeframe by providing local people with knowledge of mercury toxicity to human body and the environment, the safe and environmentally sound guidances on ASGM. Moreover, it should provide the clearly definition on the word “more than significant” so that each country can apply it to classify their own gold mining size and it can facilitate them to make their own action plans that suit to their context.

(2) Public Health Strategy for Artisanal and Small Scale Gold Mining (ASGM)

(2.1) There should be recommended that the Health Impact Assessment or Health Risk Assessment (Retrospective, Current, and Prospective Human Health Risk Assessment) on mercury exposure should be conducted in the target area if Small-Scale gold mining is still operating and in case of after closing.

(2.2) In title 5.9 Preventing Exposure of Vulnerable Population to Mercury Used in Artisanal and Small-Scale-Gold Mining, it should add the precautions to protect exposure from other pathways such as food diet and drinking water daily consumption. For example, food or fish contaminated by methyl mercury which is the highly toxic form of mercury compounds. Moreover, in the same area, it should not only focus on artisanal and small-scale gold mining, but also industries or coal-fired power plants. If it is possible, the Public Health Strategy could not only include ASGM, but also other point sources activities.

(2.3) The interim Secretariat on Minamata Convention in collaboration with WHO should develop Public Health Strategy for the mercury exposure from gold mining. Currently, WHO is developing Roadmap to Enhance Health Sector Engagement in Strategic Approach to International Chemicals Towards the 2020 Goal and Beyond for which covers all chemicals

Views on Article 11 - Mercury Waste Thresholds

(1) Industrial waste contaminated with mercury or mercury compounds in high level above the standard level or is classified as hazardous waste needs an appropriated management by the licensed waste processor for disposal or recycling. If some certain wastes could not be handled in Thailand such as petroleum waste, it will be imported to other country according to the Basel Convention provisions.

(2) To classify the waste becoming to be hazardous waste, Thailand determines the Mercury Waste Thresholds within 2 types including the Total Threshold Limit Concentration (TTLC) more than 20 mg/kg and the Soluble Threshold Limit Concentration (STLC) more than 0.2 mg/l. The Waste Extraction Test will be applied when the total concentration of mercury waste is not above the TTLC level but equal or more than STLC level or if the waste will be disposed by secured landfill.

Views on Article 12 Contaminated Sites (The management of sites contaminated with mercury)

(1) To protect human health, Thailand determines the mercury level in soil quality standard for habitat and agriculture purposes should not more than 23 mg/kg and for other purposes should not more than 310 mg/kg as well as mercury level in ground water quality standard should not more than 0.001 mg/l.

(2) In Thailand's guideline on mercury contaminated site in industrial areas, it is recommended that industries should control the contamination of pollutants including mercury in soil and groundwater inside their own area under the reference standard which is defined by the health risk assessment. If mercury level exceeds the standard level, it is recommended that industries should do remediate

their sites and conduct the soil and groundwater monitor programmes every 3 years and every year, respectively, after remediation.

(3) The interim Secretariat on Minamata Convention should develop the mercury contaminated site remediation guideline by using the information both from Guidance for Mercury – Contaminated Network and Guidance which developed under the Barcelona Convention for the protection of the Mediterranean Sea against Pollution and from the countries having experiences on mercury contaminated sites, for example Japan.
