

## Comments from Thailand

First of all, Thailand would like to apologize for the delayed submission of our comments on the above-mentioned subject. After consulting among relevant authorities and the national sub-committee on Minamata Convention on Mercury, we highly appreciate the work done by the intersessional expert group on the draft report. However, we would like to suggest that all preliminary list of potentially relevant point source categories should include different options that apply or not apply BAT/BEP because of reflecting the different mercury released amounts. In case of release to land, the stored waste for further treatment and final disposal should be counted at the source category of the treatment and disposal facilities, not included at their generated source categories to avoid the duplicated counts for the release amount.

In addition, we also would like to suggest the amendment of the table of preliminary list of potentially relevant point source categories as follows:

1. Add a red font phrase and delete the blue font phrase in the column of release points of the sources category no. 5.1.3, then the next would read: "Mercury may be released to water from onshore and offshore oil extraction, **depending on their best available techniques, best environmental practices and local regulations** as well as from oil refining. The same is likely the case for on-shore extraction. Major oil-based industrial boilers and power generation with dust filters release mercury-containing filter residues to land or waste ~~(depending on local regulation)~~."

2. Add a red font word and phrase as well as delete the blue font letter and phrase in the column of release points of the sources category no. 5.1.4, then the next would read: "Offshore natural gas extraction **may release** mercury to water, **depending on best available techniques, best environmental practices, and local regulations**. The same is likely the case for on-shore extraction. Gas extraction in high-level mercury regions may have mercury filters from which residues are disposed of as waste or regenerated offsite. (Gas condensates have concentrated mercury ~~and which~~ may ~~sometimes be deposited~~ **be removed from upstream process and disposed of as wastes** or release to land. ~~In some cases~~ **Also**, mercury is extracted from the condensate ~~for marketing or final disposal~~ **in petrochemical processes using mercury filter which is either disposed of as wastes or release to land. These largely sources depend on best available techniques, best environmental practices, and local regulations**)

Because some certain Parties including Thailand applies the best available techniques, best environmental practices, and local regulations to onshore and offshore oil and natural gas extractions for zero discharging of their wastewater. Therefore, the guidance should have more options for different applied technologies and practices of oil extraction with different emissions/releases factors in order to reflect the real situation for inventories of mercury releases for these point sources from each Parties.