IPEN Intervention on Air Emissions
Joe DiGangi
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Like to begin by stating the importance of identifying and addressing emissions to all environmental media.

Studies conducted by UNEP indicate that the largest human source of mercury emitted to the atmosphere comes from coal combustion. This is not only a toxic threat to humans from mercury but links the mercury treaty to global climate change. Other sources of mercury emissions to air identified by UNEP include cement production, ore processing, and waste incineration.

If the mercury treaty is to be meaningful, it will need to address emissions from coal-fired power plants and other unintentional sources as a priority binding measure. There are some technologies to control mercury emissions from these sources but unfortunately they continue to contaminate the world because they are not implemented or regulated.

We propose that the treaty should pursue a two-pronged approach to address this important issue.

First, the treaty should promote the development and use of effective and affordable alternative technologies that do not release mercury.

Second, the treaty should also include provisions to promote and require Best Available Techniques (BAT) and Best Environmental Practices (BEP) for unintentional mercury sources where no assessable and affordable alternatives are available. This should be done taking into account that best practices and mercury control technologies and their availability and affordability will probably continue to evolve.

The Convention should establish a subsidiary body on BAT/BEP that will develop recommendations to the Conference of the Parties on a regular basis on three important elements:

1. What constitutes BAT/BEP;
2. Matters relating to BAT/BEP accessibility and affordability
3. Timelines for implementation of BAT/BEP requirements.

The goal of this two-pronged approach should be to continually minimize mercury emissions from unintentional sources with the goal of their ultimate elimination.