



a toxics-free future

11 March, 2016

Best Available Techniques (BAT) / Best Environmental Practices (BEP)  
Intervention by IPEN for INC7

Given by Rochelle Diver, International Indian Treaty Council

Thank you Mr. Chairman,

IPEN would like to join others in thanking the BAT/BEP expert group for their excellent work on the Draft Guidance. We would like to make 2 points about the guidance:

First, we believe that one useful addition to the guidance would be to include an overall waste management strategy that provides guidance on how to avoid creating new sources of mercury releases. This is because prevention is much cheaper than cleanup. This section should include some of the strategies currently mentioned only in the BAT/BEP incineration section such as Zero Waste, waste minimization, and medical waste management. This would help address issues of mercury sources from waste co-firing in cement kilns, power plants and/or metallurgical plants.

And second, another useful addition to the Guidance is in the coal-fired power plant section. We think it would be useful to include a section outlining renewable energy sources such as wind, solar, wave, etc. A 21<sup>st</sup> century document should at least acknowledge activities countries are already undertaking in this area.

In summary, the additions we are proposing deal with cost savings and acknowledging country activities on energy sources. These guidelines are important and we thank the expert group for its work.

Thank you Mr. Chair.