

IPEN INC6 Priority Action: Contaminated sites (Article 12)

The following decision is stated in the current paper prepared by Secretariat for INC6 on contaminated sites (UNEP(DTIE)/Hg/INC.6/19): "The Committee may wish to request the secretariat to seek input from Governments and other interested stakeholders on any guidance documents or recommendations in relation to contaminated sites, and to request the secretariat to prepare, in consultation with the relevant secretariats in the chemicals and waste cluster and other organizations or bodies, as appropriate, a draft guidance document for consideration by the Committee at its seventh session."

Development of Guidance on managing contaminated sites is seen by IPEN to be one of crucial issues needed to be addressed thoroughly as soon as possible. Therefore we underline:

- importance of preparation of Guidance on managing contaminated sites

and suggest, that it must not only prepared by Secretariat for INC7, but also will be given for review to a special expert group. Therefore IPEN suggests:

 either to establish a special expert group or at least to use the knowledge and experience of experts in the group established for development of BAT/BEP Guidelines and task that group to review the guidance document prepared by Secretariat.

INC7 or COP may benefit from such a review of the prepared guidance by an expert group prior to its submission to the Committee / COP because such a review will already include different opinions of experts representative of different UN regions. Such guidance should go into more depth on technical and associated issues than two pages of text in the Basel Convention's Technical guidelines on mercury waste. The Basel Guidance has been suggested as the key document for guidance on contaminated sites.

The Guidance document on managing contaminated sites should also consider establishing threshold levels for mercury and other criteria should be etablished to define a site as being contaminated by mercury. This guidance is needed mainly for developing countries which have not developed a specific legislative framework in order to address contaminated sites as some developed countries have already done.

IPEN also seeks inclusion of mercury releases from contaminated sites in the Mercury releases toolkit as they are not addressed by the toolkit at this point. That is inconsistent with the previous statement by UNEP: "Contaminated sites also contribute to re-mobilization and re-emissions of mercury, a significant source and pathway of mercury air emissions (Pirrone, Cinnirella et al. 2010); (UNEP Chemicals Branch 2008)."

Literature

Pirrone, N., S. Cinnirella, X. Feng, R. B. Finkelman, H. R. Friedli, J. Leaner, R. Mason, A. B. Mukherjee, G. B. Stracher, D. G. Streets and K. Telmer (2010). "Global mercury emissions to the atmosphere from anthropogenic and natural sources." Atmospheric Chemistry and Physics Discussions **10**: 4719-4752.

UNEP Chemicals Branch (2008). The Global Atmospheric Mercury Assessment: Sources, Emissions and Transport. Geneva, UNEP - Chemicals: 44.