

Arnika Intervention on BAT/BEP  
27 April, 2011

Thank you Mister President,

I represent Arnika Association, participating organization of IPEN as well as IPEN Dioxin, PCBs and Wastes Working Group.

On behalf of many NGOs around the globe I would like to thank the Secretariat and all who contributed to the current version of the „ Best available techniques Guidelines and provisional guidance on best environmental practices which, for simplicity, I will refer to as the BAT/BEP Guidelines. We know that many NGOs found this document very useful especially as it includes many useful examples of best environmental practices in waste management and important information about how to prevent undesirable POPs releases. We believe many of the sections are equally relevant to each of the three conventions and that the current document makes an important contribution to synergies between the conventions. We are aware from feedback from participating NGOs that many other Technical Guidelines on wastes produced by the other conventions lack this over-arching usefulness.

The work done by Secretariat to collect feedback from countries in all regions is also appreciated. Some developing countries have raised concerns about the financing of measures for specific technologies according the BAT/BEP Guideline. We therefore consider it is important to retain those general parts focused on alternative technologies and approaches – particularly in relation to waste management. These parts in current BAT/BEP Guidelines provide helpful information on cheaper alternatives which reduce environmental impacts of waste and which do not lead to creation of unintentional POPs such as dioxins. We support proposals to enlarge the chapters on alternatives to technologies that are listed namely in Annex C. Such information was also sought by Basel Convention bodies during the first round of work on BAT/BEP Guidelines.

Mister Chair, let me emphasis how effectively and constructively the BAT/BEP expert group worked. Non-governmental organization representing both civil society as well as industry made significant and positive contributions which improved the quality of the final BAT/BEP Guidelines. We trust that NGOs experts will be invited to contribute their expertise in the future revisions of BAT/BEP Guidelines. We hope this process will remain as open and transparent as it has been in the past. We therefore suggest that the BAT/BEP Guidelines updating procedure should:

- 1) include collaboration with the POPRC due to the particular expertise of that body on new POPs as well as with Toolkit expert roster taking advantage of their expertise on unintentional POPs releases
- 2) Allocate positions in the expert group for representatives from both public interest and industrial NGOs representatives as has been the case for all previous meetings of the BAT/BEP expert group
- 3) Place greater emphasis on source categories specific to developing and transition countries

Thank you Mister President.