

Thank you Mr. Chair,

In a recently published report by UNEP on the Global Mercury Assessment 2013, the largest anthropogenic source of mercury emissions to air are associated with artisanal and small-scale gold mining (ASGM) and coal burning, representing 37% and 24% respectively. In other words, if the treaty is going to reduce global mercury pollution, then it must reduce and eliminate mercury pollution from ASGM.

Currently, there is no requirement to address ASGM if a country does not admit it has ASGM or determines that it is not “more than insignificant” However, there are no guidelines to determine “significance”. The article would be much clearer if the conditional phrase “more than insignificant” was simply deleted.

Ironically, the current negotiated text proposes the importation and use of mercury in ASGM without import limits or a phase out date supported by the developed countries as well as the ASGM countries. This would result in a treaty that continues trade and unlimited use of mercury for the largest mercury emission source to air and a huge source of releases to land and water. The public would view this as a failure.

Considering the permanent damage to human health and the harms to the environment, mercury trade for use in ASGM should be prohibited. We are concerned that proposals to allow trade of mercury for ASGM also imply making mercury an allowed use under the convention. This would mean that the mercury treaty would say that the most polluting use of mercury is “approved”. The public would view this as a failure and question whether the treaty has any real meaning.

Prohibiting mercury trade – including for ASGM – would happen when the treaty comes into force. That is likely to be five years from now. A responsible course of action would be to aggressively promote safe non-mercury methods, especially the proven, robust and reliable ones. An organized substitution program would have the capability of matching the end of mercury trade.

At the moment, in the ASGM market, we can easily find mercury imported from the US, Spain, Germany and China at relatively low or affordable prices. Before it is banned by entry into force, the quantity of mercury exported and imported by countries for ASGM use should be tracked and publicly registered.

Finally, ASGM has been recognized as the largest source of emission from intentional use of mercury but not acknowledged as the killer, it is. In fact, mercury is an invisible and delayed killer in many ASGM sites jeopardizing the existence of the current and future generations. This is the time to show political will to prevent Minamata disease in more than 20 million people.

Thank you for your consideration