IPEN INTERVENTION
ARTICLE 11 RELEASES TO WATER AND LAND
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Thankyou Chair,
We appreciate this opportunity to address the importance of controlling total releases of mercury including those to water and land. (, like many of the interventions preceding us.) Currently, the draft elements paper proposes no obligatory measures to control mercury releases to water and land from the limited number of sources currently listed in Annex F. We need to remind ourselves that the Minamata tragedy resulted from releases directly to water.

In regards to releases from water and land, IPEN considers that the use of best available techniques (BAT) should be required for all new sources and that BAT needs to be phased in a set timeframe for existing sources. This Is very important due to the broad range of mercury contaminated solid and liquid releases emanating from the sources listed in Annex F but also in Annex E.

Chair, If the Convention places mandatory requirements on parties for the control of air emissions but not for other media, facility operators would be encouraged and even rewarded for reducing mercury air emissions by creating additional mercury water and land pollution.

To address this and provide clarity, we suggest combining Article 10 and 11 with a joint Annex covering all priority sources and with one set of BAT/BEP Guidelines for releases to air, water and land from these sources. This approach would avoid confusion about which guidelines a facility should use and give appropriate emphasis to addressing the total releases of mercury.

Currently, mercury releases to water and land associated with the use of fossil fuels such as coal and gas, are not directly included in Annex F. Yet, we know with the increasing use of pollution controls associated with these sources, we will experience an increase in mercury contaminants in for example, effluent from coal washing and in coal ash. The POG document acknowledges the 'high content of mercury in the coal combustion residues' and the possibility of mercury leaching and cross media transfers of mercury resulting from the reuse of coal ash
in agricultural fertilizers and LAND disposal. These provide clear routes of mercury exposure to the environment through leaching to groundwater and surface water. The current use of coal ash in products such as synthetic gypsum wallboard and cement products also leads to occupational exposure to workers and consumers.

To conclude, IPEN considers that the impacts of mercury pollution need to be addressed in the framework of total releases and believe that for the mercury treaty to succeed we need a holistic approach that seriously addresses releases to air, water, land and products. Chair, Only through such an approach can we truly reduce environmental levels, protect human health and once again make fish safe to eat. Thankyou for listening and your consideration