



Brussels, 13th June 2007

Dear Member of the European Parliament,

Environmental and Health NGOs' appeal: Support the Environment Committee's report on broad export ban and safe storage of mercury [1st reading vote in Plenary 19-20 June – Papadimoulis report]

The coalition of environmental and health NGOs welcomes the Commission's proposal of an EU mercury export ban and the safe storage of surplus mercury. We consider however, that several aspects of the Regulation should be strengthened to ensure protection for human health and the environment. Therefore, we welcome the Environment Committee's report by Mr. Papadimoulis and ask for your full support on the amendments it proposes, next week at the Plenary discussion and vote, 19-20 June. Our precise voting recommendations will be sent to you soon.

It is well-known that mercury travels throughout the atmosphere, contaminating European and global food supplies at levels which seriously threaten human health, wildlife and the environment. Since the current measures are insufficient to reduce contamination, further action must be taken.

We therefore urge you to support the report for the following reasons¹:

1. The export ban should include mercury compounds and cinnabar

Compounds represent some of the world's highest-volume uses of mercury, and thus present a major loophole in the proposal. There are various ways in which mercury can be recovered or reconverted from different compounds (calomel, cinnabar, non-ferrous metals, mercuric oxide, mercuric chloride and other organo-mercury compounds), many of them at a substantial profit.

2. Export of mercury-containing products prohibited for sale in the EU, should be banned

Mercury-containing products are a major contributor to mercury spills during their use and disposal and therefore present both direct health risks and environmental contamination. Additionally, the EU should shun double standards. Mercury-containing products prohibited here should not be exported to countries where they may not yet be regulated, and where their disposal is often poorly handled.

3. The proposed bans should be implemented as soon as possible, and preferably by 2008.

The later the implementation date, the more mercury will go onto the world market. The EU is the world's largest source of mercury exports, most of which go to developing countries where it is often haphazardly used and released, contaminating workers and their families, local communities and global food supplies.

4. Temporary storage of decommissioned mercury from the chlor-alkali industry must begin as soon as possible, in continuously-monitored secure sites located where immediate intervention can take place if necessary.

The Commission's proposal on the final disposal of metallic mercury seems premature: Disposal of liquid waste is banned under the EU Landfill Directive, due to the risks the waste entails; disposal of liquid metallic mercury in salt mines raises serious concerns over very long-term environmental safety; research on safe disposal methods is going on in Sweden as well as in Spain; and the USA has also concluded that the best solution for the moment is temporary above ground storage.

Until safe disposal techniques have been developed and fully evaluated, metallic mercury should be stored temporarily so that it can be retrieved. Minimum conditions for storage should be established, ensuring continuous monitoring, minimum safety standards, regular and transparent reporting, advance planning and projections, assurance of delivery, and penalties for failure.

¹ For more information please see earlier letter
http://www.zeromercury.org/EU_developments/070426NGOS_1stReadingENVI_Hg_Export_ban.pdf

The responsibility for safe final disposal should remain with Member States and the chlor-alkali industry as appropriate.

5. **Information should be provided periodically by industry and Member States on the movement of mercury and the quantities involved**, including exports and imports of elemental and compound mercury between Member States, and between the EU and external countries. Information should start being collected immediately and before the effective export ban date.
6. **The regulation should be based on Art. 175 of the EC Treaty and allow Member States to implement stricter measures, as early as appropriate**, since the proposed policy is driven by environment and not commercial policy consideration.
7. **The EU should also prohibit import of mercury and mercury compounds** ensuring EU mercury supplies are consistent with EU demand, mandatory storage obligations, and policies encouraging mercury recovery from waste and products.
8. **Technical and financial support to developing countries and NGOs working on the issue could be crucial for those countries' progress towards mercury-free products and processes.**

We much appreciate this Commission initiative. A strong EU position recognises the EU's responsibility as the world largest exporter of mercury for its share of the problem. Ensuring an EU mercury export ban acknowledges that there is little point in just reducing mercury demand within the EU, only for unwanted mercury to be exported to developing countries under far less stringent controls, released, for it ultimately to be returned to Europe's atmosphere and the fish we eat. This is a straightforward opportunity to reduce health risks to millions of people in the EU and worldwide that we cannot afford to miss.

Thank you in advance for your support,

Yours sincerely,



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¹ Environmental NGOS include

The **European Environmental Bureau (EEB)**, www.eeb.org, is a federation of more than 140 environmental citizens' organisations based in all EU Member States and most Accession Countries, as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The aim of the EEB is to protect and improve the environment of Europe and to enable the citizens of Europe to play their part in achieving that goal.

The **Zero Mercury Working group**, www.zeromercury.org, is an international coalition of more than 56 public interest non-governmental organizations from around the world formed in 2005 by the European Environmental Bureau and the Mercury Policy Project/Ban Mercury Working Group. The aim of the group is to reach 'Zero' emissions, demand and supply of mercury, from all sources we can control, towards eliminating mercury in the environment at EU level and globally."

Health and Environment Alliance (HEAL), <http://www.env-health.org/> is an international non-governmental organisation advocating environmental protection as a means to improving health and well-being. Member groups and organisations represent health, environment, women, health professionals and others. The group has a diverse membership of over 50 groups including non-governmental organisations, professional bodies representative of doctors, nurses and other healthcare workers, academic institutions and other not-for-profit organisations.

Health Care Without Harm Europe (HCWH), www.noharm.org, is an international coalition of hospitals and health care systems, medical and nursing professionals, community groups, health-affected constituencies, labour unions, and environmental. HCWH is dedicated to transforming the health care industry worldwide, without compromising patient safety or care, so that it is ecologically sustainable and no longer a source of harm to public health and the environment.