

ZMWG INC6 Article 21 Intervention

Thank you Mr. Chairman. We regard consideration of the reporting form as one of the more important items before us at INC 6, because the reporting form should produce crucial information for the COP and stakeholders on the effectiveness of the Convention. We are concerned the proposal before us is will not yield the information needed, both as to frequency of reporting and the contents of the form. We focus here on two critical concerns.

First, we agree with some speakers that some information should be collected more frequently than every four years, because more timely information is essential for Convention effectiveness. The Montreal Protocol requires annual reporting of CFC production and trade, and is thus an important precedent for the INC to consider as it moves forward. The COP will need data on amounts of mercury produced from primary mining, byproduct recovery, and recycling, and the disposition of chlor-alkali mercury to quantify mercury supply reductions, and global trends. Regarding mercury trade, we noted yesterday the need for timely trade information could be addressed to some extent by submitting copies of the consent forms to the Secretariat. If that does not happen, then timely trade reporting should be required under Article 21.

Second, important Convention obligations and reporting obligations are not covered by the proposed Secretariat reporting form. They include:

- The fate of mercury from decommissioned chlor-alkali plants;
- Measures to discourage new mercury product types and new mercury processes;
- The required measures to phase out or down mercury use in industrial processes; and
- The emissions and release inventory data.

These gaps need to be rectified, and on the second problem in particularly, the Canada CRP is very helpful.