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Gunnar Futsaeter
Programme Officer
Chemicals Branch
Division of Technology, Industry and Economics
United Nations Environment Programme
International Environment House
11-13 Chemin des Anémones
CH-1219 Châtelaine
Geneva, Switzerland

Dear Gunnar,

Thank you for the opportunity to provide input on the first meeting of the new UNEP global mercury partnership on cement. As discussed during our recent phone call, we would suggest that the meeting begin with an agenda item on the draft business plan. We also have some ideas regarding potential partnership activities.

As the draft business plan states, “the partnership area is open to government and non-government partners and UNEP welcomes the broadest possible collaboration.” The draft plan also states that: “The Cement Partnership is still in its organization phase” and the meeting objectives include defining “...the next steps forward for the partnership, in terms of work areas and deliverables.” Given that the business plan is a template for the work of the partnership, participants should have the opportunity discuss it, since this is the first meeting of the partnership. This could include a presentation on key elements of the draft plan and the opportunity to ask questions.

Our second concern is that we don't support an agenda item discussion on BAT/BEP guidance since we believe that this is outside the scope of the business plan. We suggest that this agenda item be replaced with one of the priority actions listed in the draft business plan that we can support, such as increasing awareness of the cement industry to mercury as a pollutant.

We would also like to suggest some activities for the partnership to consider during the meeting, particularly in the area of pre-kiln mercury emission reductions. These could include a focus on the development of case studies in developed countries, developing countries and countries with economies in transition in the following areas:

1. Employee training (including a certification program) to operate pollution controls;
2. Best monitoring practices;
3. Survey of available equipment vendors; and
4. Low cost approaches for reducing mercury content in feedstock.

We also suggest that a global inventory should be developed on cement kilns similar to what was done in the chlor-alkali partnership. This inventory should list the number, size, location and a mapping of facilities around the globe, and, where available, include a listing of the technologies currently employed.

In addition, a fundamental question that should be considered is whether the UNEP toolkit remains the best basis for estimating mercury emissions from the cement industry, and if not, how should it be improved. And secondly, how should emission reductions be measured and demonstrated, and then reported.

In summary, we recommend that this new partnership area focuses first on research projects, case studies and in the development of educational materials and information for dissemination world wide. Such an informational resource should be designed and presented in a user-friendly manner to inform and demonstrate to government officials, industry, NGOs and others both innovative and cost effective solutions for reducing mercury emissions from cement kilns that can be of use around the world.

Sincerely,

Michael T. Bender
and
Elena Lymberidi-Settimo,
ZMWG Coordinators