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Dear Ken,

Thank you for your email and interest in receiving ideas and information to share during the fifth meeting of the UNEP Global Mercury Partnership Advisory Group meeting (PAG5) in Edinburgh on 27 July 2013. The Zero Mercury Working Group¹ is writing to propose enhanced cooperation and communication between the chlor-alkali and supply-storage partnerships in the area of reducing global mercury releases from surplus mercury originating from chlor-alkali plants.

The overall goal of the Global Mercury Partnerships is to protect human health and the global environment from the release of mercury and its compounds by minimizing and, where feasible, ultimately eliminating global, anthropogenic mercury releases to air, water and land. The supply-storage partnership plan is designed to address surplus mercury, consistent with the priorities set out in paragraph 19 of UNEP GC Decision 24/3, through “Minimization and where feasible, elimination of mercury supply considering a hierarchy of sources, and the retirement of mercury from the market to environmentally sound management.”

According to the chlor-alkali partnership business plan, “Mercury cell chlor-alkali production remains a significant user of mercury (at about 18% of global mercury consumption) and is a significant source of mercury releases to the environment. Mercury cell facilities which close or

¹ ZMWG is an international coalition of over 100 public interest environmental and health non-governmental organizations from 54 countries from around the world formed in 2005 by the European Environmental Bureau and the Mercury Policy Project. *ZMWG strives for zero supply, demand, and emissions of mercury from all anthropogenic sources, with the goal of reducing mercury in the global environment to a minimum.* For more information, see: <http://www.zeromercury.org/>.

convert to non-mercury cell technologies also have significant amounts of surplus mercury which require environmentally-sound long-term management.”

This issue is also addressed squarely in the supply-storage partnership business plan: Storing mercury from closing or converting chlor-alkali facilities can be a very cost effective way to reduce the global mercury supply because large quantities are already aggregated at one location. The plan is to provide a framework for developing and implementing mercury storage/disposal and supply related activities and projects, and to address future supply related activities.

Perhaps more importantly, Article 3, paragraph 5(b) of the new *Minamata Convention on Mercury* prohibits the re-use of mercury from decommissioning chlor-alkali plants, except for reuse within the sector, thereby necessitating the need for storage, and ultimately safe disposal, of this mercury. The chlor-alkali partnership should assist the industry in preparing for this treaty obligation and the supply-storage partnership can play a supporting role in this.

In order to address our shared goal of reducing global mercury releases, we propose to identify and discuss possible areas where the two partnerships could work together. Pertaining to the chlor-alkali sector, here are some of the priority areas identified in the business plan:

- Working with the relevant industry sectors, governments, and other interested parties to determine how much mercury will become available from decommissioned or converted chlor-alkali plants;
- Developing industry sector plans for the storage of mercury from chlor-alkali plants;
- Gathering additional data on the extent to which the existing waste infrastructure could be used for elements of the surplus mercury storage needs for the near term at least; and
- Assessing and facilitating availability of options and technologies for storage or final disposal of excess mercury supply.

In closing, we appreciate the opportunity to provide input and look forward to first discuss and then move forward on ways the two partnerships can work together, perhaps leading up to a joint announcement of collaboration and focused attention on this starting at PAG5.

Sincerely,

Michael T. Bender
And
Elena Lymberidi-Settimo
ZMWG Coordinators

cc Judith Torres, Ana Gonzalez, Supply and Storage Partnership Leads