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Dear John,

Thank you for the opportunity to comment on the document entitled *Study on mercury-emitting sources, including emission trends and cost and effectiveness of alternative control measures* “UNEP Paragraph 29 Study”. This document provides a good technical assessment of emissions and appropriate control technologies for large mercury emitting sectors. While we provide significant recommendations as to how the draft report could be improved, as margin comments in the attached copy of the report, we remain confident that sufficient information exists to develop control measures in the mercury treaty which will result in substantial mercury emission reductions.

The following are the consolidated comments of members of the Zero Mercury Working Group (ZMWG), on that draft document. We have several general comments listed here, followed by specific suggested edits and comment boxes within the draft document itself (attached).

While residential cooking and heating is not included as a major sector in this report, and for good reasons as this sector is extremely diffuse, we recommend a brief highlight of the magnitude of emissions from this sector, which is estimated to account for 20% of global mercury emissions. It bears noting in the draft that alternative fuels, improved stoves and other controls are important to consider for this sector, given the significant direct health impacts widely recognized from residential heating and cooking.

We have flagged in several areas of the draft that certain mercury control technologies are already in full scale use (most notably, activated carbon injection). It is important to note these instances of commercial scale use in addition to studies and pilot tests of technologies, while being mindful of the need to promote the successful global transfer of technologies in some areas of the world.

We appreciate the opportunity to participate in the development of UNEP Paragraph 29 work and look forward to continued involvement. Please do not hesitate to contact us for further discussion: Susan Egan Keane, Natural Resources Defense Council (+1 (202) 289-2389, skeane@nrdc.org), or Elena Lymberidi-Settimo, Project Coordinator 'Zero Mercury Campaign', European Environmental Bureau (aisbl) (EEB), Zero Mercury Working Group (ZMWG) (+32 2 2891301, elena.lymberidi@eeb.org).