



ZMWG VIEWS ON INTERIM STORAGE GUIDELINES

October 2018

1. The storage guidelines now before the COP reflect two years of preparation by the Secretariat, in consultation with an expert group. Since the earlier COP 1 version, the wording and formatting of the document has significantly improved, and the guidelines themselves have been strengthened, including emphasis on the need to ensure interim storage facilities are closed in an environmentally sound manner.
2. We recommend that the storage guidance be adopted at COP 2. It is important that the guidance be finalized soon, since mercury storage is ongoing at many locations, including at trading companies, mercury product manufacturers and chlor-alkali facilities.
3. While we recommend adoption of the guidance as currently drafted, should the guidelines be reopened for discussion during COP 2, we would suggest that use of financial assurance instruments be considered for private facilities as part of any revisions package to the current draft. Financial assurance instruments, such as bonds, would ensure that the owners of storage facilities have the financial capability to both dispose of any surplus mercury in an environmentally sound manner and clean up any contamination found on site, so government funds are not needed.