

Comments from the EU and its Member States on the draft report of the ad hoc group on effectiveness evaluation

The EU and its Member States thank the expert group on effectiveness evaluation for their work and welcome the substantial progress they made.

The analysis provided in the draft report is highly appreciated. We also welcome the preparation of draft terms of reference for the effectiveness evaluation committee, the timetable for the first effectiveness evaluation and that the group formulated recommendations on monitoring and monitoring arrangements

Some important recommendations from the group require further non-technical discussion and are therefore not addressed in our comments at this stage, in particular the proposed size and composition of groups and the suggestion to recommend that GEF fund projects aiming at filling monitoring gaps. The former should take into account of experience under other MEAs, e.g; the Stockholm Convention that covers 28 substances. The latter is a matter that goes beyond the groups' mandate since it relates to the guidance to the GEF given by the COP and would have to be looked at from that perspective. We will be happy to engage with Parties in discussing these major issues at COP2.

The next steps should include looking carefully into the mechanisms which are being developed and to balance the efforts equally with the other very important elements/issues under the Convention.

1. General comments

1.1 Structure of the report

We suggest including at the beginning of the report a summary conveying the main messages and recommendation to the COP. We think this would greatly facilitate discussion at COP2 on this highly complex subject.

1.2 Monitoring

1. The report emphasises that there is a wealth of data concerning mercury, which is not the case for other pollutants, but also identifies gaps in the availability of comparable monitoring data. It would be useful to spell out in detail what those gaps are for each category of monitoring data. If the group cannot undertake a detailed analysis of the gaps before COP2, we would welcome the inclusion in the report of an initial insight on the nature of those gaps and the magnitude of efforts from Parties needed to fill them.

2. The thorough assessment of available monitoring data and of options to improve datasets in the future gives a very good understanding of the state of play, which is a major achievement and essential first step. Whilst all monitoring information is valuable, it may have varying degrees of usefulness at different geographical scales. Hence, it would be useful to work on rating monitoring data against its usefulness at the various local, national, regional and global levels, including regarding hotspots. This would help building a common understanding of the type of monitoring data likely to provide the most meaningful data to inform on global trends.
3. The table page 17 identifies monitoring data that should be used when assessing effectiveness of a number of articles of the Convention. The report also states page 17 that this requires an appropriate assessment of causality, which we understand as the attribution of changes in monitoring data trends and levels to action taken under the Convention. Furthermore, the complexity of assessing causality as well as the likelihood of confounding factors are emphasised page 19. The COP will have to discuss in detail this major issue. Hence, any further explanations would be welcome. We note that the draft Summary for Policy Makers of the next Global Mercury Assessment may be a source of information in this regard.
4. Finally, we would like to highlight the potential important role of establishing formal agreements between involved parties to facilitate the sharing of comparable monitoring data from different existing networks. This could be a building block of a structure for validating monitoring data.

1.3 Effectiveness evaluation framework

1. We support the three step-approach described in page 19. However, it is difficult to understand that the “outcome of analytical assessment of the whole set of article-by-article indicators” would be defined as an indicator as referred to in table 4. This seems rather to point to the need for a methodological approach for bringing together the information provided by the whole set of indicators.
2. As it may be difficult in the short term to base the effectiveness evaluation on monitoring data, the first effectiveness evaluation cycles will mainly rely on information on the trend of environmental pressures and description of actions taken by the Parties. However, a number of indicators will depend on the provision of information by Parties, not only through their reports under Article 21 but beyond this on a voluntary basis. In particular, the available of information on emissions to air will be crucial for any effectiveness evaluation to be meaningful.
3. The list of indicators proposed in table 4 seems reasonable. The next step will be to define each indicator in more detail.

2. Detailed comments

1. The importance of the upcoming codex alimentarius standards and related generation of monitoring data should be more emphasised as an opportunity to gather more and better data.
2. Further, for the monitoring part of the effectiveness evaluation of the Minamata Convention it is proposed to focus on air and human hair. Both are non-invasive and easily accessible media which can be included under other monitoring regimes. Other available monitoring data such as data from biota, blood and other environmental compartments can provide valuable information about the occurrence of mercury and be included as appropriate and available.
3. Guidance aiming at promoting data comparability is helpful but this should only be as detailed and prescriptive as needed taking into account the complexity of monitoring activities. Where the focus is to identify trends one needs to take as much noise out of the system as possible but this does not necessarily require fully harmonised methods. For example, experience with OSPAR CSEMP monitoring was trend assessment required matching the size classes of fish each year. Ideally, one would have had five defined size classes of the same species matched annually. In practice, due to complexity of such a monitoring model, this was reduced one species, one size range (broader) and three replicates in each. Once the approach was set, it was maintained as sampling strategy throughout.
4. The GEOSS Platform (www.geoportal.org/community/gos4m), built within the Group on Earth Observations (GEO) and the GEO Flagship “Global Observing System for Mercury - GOS4M” (www.gos4m.org), is a system bringing together existing regional and global mercury monitoring networks (air, water and biota). It aims to improve interactions and cooperation with policy makers and to further develop a coordinated global network. This platform could be a model for promoting cooperation between networks. Formal agreements could be set between such platforms and Parties and/or the Minamata Convention Secretariat.
5. Specific comments to the list of regional monitoring programmes: EMEP: It is proposed that it is emphasized in the beginning of the paragraph that EMEP presently covers 64 sites and 23 countries AMAP: AMAP has been tasked by the Arctic Council to support work under relevant international conventions. The AMAP Thematic Data Centres compile data from relevant national monitoring and research activities and make them available under strict conditions that protect the rights of data originators. AMAP Atmospheric Thematic Data Centre holds atmospheric contaminants data for monitoring and assessment. The database is hosted by the Norwegian Institute for Air Research (NILU), Kjeller, Norway, and is accessible through their EBAS database. Kingdom of Denmark (KoD) provides atmospheric mercury monitoring from Greenland to AMAP through its national program and data is collected at the monitoring Station Villum Research Station, Station Nord, North West Greenland. Data is provided to the AMAP thematic data center and GMOS. In addition, mercury is monitored regularly in Greenlandic biota in marine, freshwater and terrestrial species in North, West and East Greenland. Human levels of mercury are measured in blood and in hair. Mercury is also monitored in the Faroese population and in relevant biota.

6. The following links should be corrected:

- www.gos4m.eu page 7 should read www.gmos.eu

- <http://www.GEOS4M.com> in footnote 2 page 11 should read www.geoportal.org/community/gos4m
