

Information relating to Article 3, Article 10, Article 11

On the mercury stocks in Article 3

According to the requirement of the Convention, the secretariat shall develop a guidance to identify the stocks. We suggest the “stock” should be defined clearly in the guidance, taking into account the possible dynamic changes of the stocks.

On the mercury storage in Article 10

Mercury is sorted as hazardous chemical in China, so mercury storage should conform to the requirements of hazardous chemicals based on *the Hazardous chemicals security management regulations*.

We would like to propose that the secretariat could refer to *the Technical guidance on the environmentally sound disposal of mercury contaminated wastes* developed by the secretariat of Basel Convention as well as the regulations of different countries when develops the technical guidance on the mercury storage.

On the thresholds of the mercury wastes in Article 11

According to mercury wastes management in China, the hazardous wastes contained mercury listed on the *National hazardous wastes list* shall be treated as mercury waste. Except for that, the other wastes should be identified the leaching toxicity and the concentration of the toxic substances through the hazardous waste identification standard. When certain waste is identified as the mercury contaminated waste, it

should be managed as the hazardous waste.

1. According to the *Identification standards for hazardous wastes-Identification for extraction toxicity GB5085.3-2007*, limit value of the hazardous ingredients in the leaching liquid should be:

Methylmercury: < 10ng/L;

Ethylmercury :< 20ng/L;

Total mercury: ≤0.1mg/L

If the concentrations of one or more hazardous ingredients exceed the limit value, this certain waste shall be treated as mercury contaminated hazardous waste.

2. The concentration of the toxic materials should be identified through the *Identification standards for hazardous wastes-Identification for toxic substance content GB5085.6-2007*. If the concentrations of one or more substances exceed the limit value, this waste shall be managed as hazardous waste. Substances relevant to mercury in this standard are included in the Annex A (Mercuric iodide, thiocyanate mercury, mercuric chloride, mercuric cyanide, mercury nitrate) and Annex B (Mercurous bromide). The hazardous waste shall meet one of the following conditions:

- (1) The total concentration of one or more acutely toxic substances in Annex A $\geq 0.1\%$;

- (2) The total concentration of one or more toxic substances in Annex

$B \geq 3\%$;

(3) Contains two or more substances with different toxicity in Annex A and Annex B and meets the formula below:

$$\sum \left[\left(\frac{P_{T+}}{L_{T+}} + \frac{P_T}{L_T} \right) \right] \geq 1$$

In the formula:

P_{T+} ——Concentration of acutely toxic substance in the solid waste;

P_T ——Concentration of toxic substance in the solid waste;

L_{T+} 、 L_T ——the Standard value of substances set out in (1) , (2) separately.

Additionally, under the *Standard for Pollution Control on the Landfill Site of Municipal Solid Waste*, fly ash from municipal solid waste incineration, medical waste incineration residues and general industrial solid waste , which are prepared through the technical specifications of *Solid waste-Extraction procedure for leaching toxicity-Acetic acid buffer solution method (HJ / T300-2007)* , when the concentration of hazardous ingredients in the leachate are below a certain limit value (the mercury limit is 0.05mg/L), could be disposed with the municipal solid waste landfill.