

No. 0304/ 8267

Pollution Control Department 92 Soi Phahon Yothin 7, Phahon Yothin Rd., Phayathai, Bangkok 10400 THAILAND Tel: 66 2298 2121 Fax: 66 2298 2129

September B.E. 2558 (2015)

Dear The Coordinator of Interim secretariat of the Minamata Convention on Mercury,

Subject: Views on the draft guidance on best available techniques and best environmental practices for controlling and where feasible reducing mercury emissions of the Minamata Convention on Mercury.

With reference to the massage from the co-chairs of the group of technical experts on air emissions under the Minamata Convention on Mercury, inviting governments and other interested stakeholders to comments the draft guidance on best available techniques and best environmental practices for controlling and where feasible reducing mercury emissions to the atmosphere, as set out in Article 8 of the Convention.

After consulting with relevant stakeholders, The Pollution Control Department, Thailand is pleased to submit our views regarding the above-mentioned mandate as enclosed herewith.

Please be assured of our full cooperation.

Yours sincerely,

(Mrs. Sunee Piyapanpong)

June Pyyyy

Deputy Director General

The Coordinator

Fnclosure: As stated.

Pollution Control Department

Interim secretariat of the Minamata Convention on Mercury

Chemicals Branch

Division of Technology, Industry and Economics

United Nations Environment Programme

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Thailand's views on the draft guidance on best available techniques and best environmental practices for controlling and where feasible reducing mercury emissions of the Minamata Convention on Mercury

Thailand would like to submit views on the draft guidance on best available techniques and best environmental practices for controlling and where feasible reducing mercury emissions of the Minamata Convention on Mercury as indicated below.

- 1. The draft guidance presents comprehensive information needed for applying best available techniques and best environmental practices. It will be useful for government and industry to control of mercury emission from point sources. However, the draft guidance should compare the advantages and disadvantages of efficiency control and investment costs of air pollution control devices, as well as present the precautions and the restrictions for using technologies so that it will be useful in the selection of appropriate technology.
- 2. The specific comment for the draft guidance of waste incineration facilities are as follows:
- The draft guidance should also focus on best environmental practices, especially waste separation at sources process, which will able to enhance more efficiency of the implementation of best available techniques. Case studies of best environmental practices from countries should be also presented in this guidance.
- The additional comment for best available techniques, it should have information about mercury control technologies of co-processing for managing industrial waste, solid waste and refuse derived fuel as substituted fuels in cement industry.
- 3. The specific comment for the draft guidance of coal-fired power plants and coal-fired industrial boilers as follows:
- The draft guidance should have information about the transportation and storage of coal.
- Selective Catalytic Reduction (SCR) installation for removing NOx from the flue gas should have more detail about the appropriate position and Flue Gas Desulfurization (FGD) should present the advantages and disadvantages of each installation position including how to operation and the cost of investment and operation.