CREPD combined comments with IPEN submission.

Comment on effectiveness evaluation by Centre de Recherche et d'Education pour le Developpement (CREPD)

20 July 2018

CREPD, as non-government organization accredited to UNEA with more than a decade experience working on environmental issues with more emphasis on heavy metals, specifically mercury and lead, welcomes and supports the **report on the work of the ad hoc group of experts on effectiveness evaluation** of the Minamata Convention.

We are glad that data gaps from some region of the world (Africa, Latin America, the Caribbean, certain parts of Asia and the Pacific and in Russia) is noted, recognized, and recommendation to fill them prescribed. But the challenge for Africa for instance lack of skilled and dedicated human resources in government to host and run a mercury monitoring programme. Those resources are available in NGOs and their roles should be recognized in the report.

The report stipulates that "To facilitate the generation of globally representative data and trend information on human biomonitoring, which will be most relevant for effectiveness evaluation, an oversight body should be kept informed of the studies planned and carried out". This statement infers that conducting mercury biomonitoring study in a community is something which is accepted everywhere. In many communities, barriers of all kinds exist and the role of information and awareness campaigns prior to a successful hair or cord sampling in such communities take place is important to include in the strategy.

In section a, it is written "It may be useful to look at lessons learned from Stockholm Convention, in particular the necessary sustainability and durability of the sampling and analysis, to allow proper capacity building in countries lacking such experience. It is recognized that this will be an ongoing process, and that it will not be complete in a simple, one-step process.", but we think that under the Stockholm Convention, the issue of gaps in data from developing countries relevant for the effectiveness evaluation of the convention is repeatedly pointed out by plenipotentiary of these countries and NGOs. We believe that the Minamata Convention can do better, and we suggest to delete this paragraph.

In section G, it should be clear that the meeting we are talking about is a face to face meeting.

Although the current report is a good starting point, there are several areas where improvement and clarification can be made.