Comments from Japan upon the request from the Minamata Convention Secretariat on the draft report on the work of the ad hoc technical group on effectiveness evaluation

September 2019

Pursuant to the COP decision MC-2/10, ad hoc expert group has prepared the draft report on effectiveness evaluation and made it available to the stakeholders for commenting. Japan appreciates the efforts made by the ad hoc group for compiling views and expertise among the experts. In this opportunity, Japan would like to submit our comments on this draft as attached.

Submitting party or organization: Japan

Contact person: Kentaro Mizuuchi

Global Environmental Division, Ministry of Foreign Affairs

kentaro.mizuuchi@mofa.go.jp / +81 3 5501 8245

Comments on Draft Report on the work of the ad hoc technical group on effectiveness evaluation

Line number	Comments
General comments	Overall cost effectiveness is an important issue for undertaking the evaluation as the Convention has limited budget. The proposal in the report recommends activities that will require substantial cost implications that the Convention may not afford. We should consider externalizing some of the components instead of direct implementation. Transparency is another concern. To avoid biased view from reaching at COP level without critical review, different groups of people should be involved in the process from level 1 to 5. Those who use a report should be a different group who produced the report so that the information will be critically reviewed in transparent manner. It could be achieved by differentiating the membership between level 3 and 4, and level 4 and 5 and avoid the overlapped membership across the levels. Most of us have the feeling that the Global Mercury Assessment (GMA) is one of the most important data sources to inform the latest scientific knowledge and environmental situation on mercury. Throughout the report, however, the legacy of the GMA is not well acknowledged. We should rely more on the GMA, which has been continuing for almost 2 decades and the experiences of it will greatly benefit the effectiveness evaluation of the Minamata Convention.
Specific comments	
380 (Table 1)	The table is inconsistent with the other part of the report in terms of the information sources, scope of the Integrated Assessment, etc. Revised table 1 is attached to this document. (See attachment)
499 (para 43)	Original text: The indicators were largely developed keeping in mind data and reports required by the Convention's reporting requirements or related bodies. Insertion suggested: The indicators (a) and (b) above were largely developed keeping in mind data and reports required by the Convention's reporting requirements or related bodies. Reason: '(C) monitoring indicators' do not fall under the indicators that is required under the Convention reporting.

528 (Table 2, H2)	Original text: Number of parties that have established information exchange mechanisms related to mercury Suggested change: Number of parties that are participated in information exchange mechanisms related to mercury Reason: Information exchange is inter-agency mechanism, so each party does not have to 'establish' a mechanism by itself.
528 (Table 2, H6)	Original text: Number of parties undertaking risk communication relating to mercury consumption Suggested change: Number of parties undertaking risk communication relating to mercury intake through food and water consumption Reason: Mercury is not consumed but enters people's body through food and water.
579 (Table 4)	Original text: Water as a separate media is included to inform modelling (attribution). Deletion suggested: [Deleted] Reason: This note appears suddenly without any explanation.
981 – 988 (para 27)	Original text: 27. Biodiversity Research Institute (BRI) has compiled mercury data from published literature into a single database, the Global Biotic Mercury Synthesis (GBMS) Database. This database includes details about each organism sampled, its sampling location, and its basic ecological data. From each reference, mercury concentrations are averaged (using weighted arithmetic means) for each species at each location. Data have been compiled from 1,095 different references, representing 119 countries, 2,781 unique locations, and 458,840 mercury samples from 375,677 total individual organisms (See UNEP/MC/COP.3/INF/XX .). Moving to INF suggested: [Deleted] Reason: It should be moved to the INF document as all other specific database/network information is now moved to INF.
1012 – 1018 (para 29)	Original text: 29. Levels of mercury and mercury compounds in water are collected in relation to water quality issues in a number of countries. These data may be useful in tracking mercury resulting from local activities which release mercury; however, will not provide overall trends on a global basis. Levels of mercury in ocean water could be comparable on a global basis and collected by existing networks and ad hoc research programmes, but currently such work is done through research-based activities and not dedicated long term monitoring programmes.

	Revision suggested: 29. Levels of mercury and mercury compounds in water are collected in relation to water quality issues in a number of countries. As the water release is considered as the another major part of anthropogenic emissions/releases together with atmospheric emission, those data is important in tracking mercury trends through appropriate data summary managing the impact of local activities. The mercury inflow to coastal area by rivers will influence the mercury methylation which may affect the people relying on the coastal subsistence fishing. Thus, although such impacts is local, the result will be used for global analysis on vulnerable population as the coastal area provides subsistence fishery (in comparison with pelagic fishery). 30. Levels of mercury in ocean water could be comparable on a global basis and collected by existing networks and ad hoc research programmes. Understanding mercury transfer from mercury emission to air, then to ocean, fish and finally to human is essential to evaluate mercury risks. Reason: The description does not properly address the importance and usefulness of the water data. Research based programmes also provide important and useful information. Non-existence of long-term monitoring programmes is not the reason to disqualify the usefulness of the information.
1019 – 1024 (para 30)	Original text: Currently, this work is done through research-based activities and not dedicated long term monitoring programmes. Deletion suggested: [Deleted] Reason: It is rather common that no long-term monitoring programme exists at global level such as human bio-monitoring. At national level, several countries undertake regular soil monitoring under their own programmes.
1117 – 1120 (para 39)	Original text: 39. The UNEP/WHO GEF Global Monitoring Project demonstrated generation of data using the WHO Protocol in developing countries to be cost-effective, practical and feasible. The project built local capacities to conduct such studies, which can therefore be repeated over time and in a range of locations to fill gaps, as described in paragraph 20. Deletion suggested: [Deleted] Reason: Unpublished information should not be cited as no one can review the validity of the information. The effectiveness evaluation should use available data.
1141	New paragraphs suggested:

	Water 42. Global data in rivers flowing into ocean is especially important as there is substantial uncertainty in estimates of global riverine discharge as compared with the atmospheric deposition which are well established. The mercury data in water are usually collected in relation to local water quality and thus not globally harmonized and will not provide overall trends on a global basis. 43. Understanding mercury transfer from mercury emission to air, then to ocean, fish and human is essential to evaluate mercury risk. Among them, the largest gap exists for marine data. Levels of mercury in ocean are collected by existing networks and ad hoc research programmes, but currently such work is done through research-based activities and not dedicated long term monitoring programmes. As current data gap is the highest for marine monitoring, it will contribute the most for improving the precision of the overall results. Reason: Comparing previous 3 media, i.e. air, biota and human, larger gap exists which should be described in this section.
1342 – 1344 (para 13)	Original text: The choice of fish species for sampling should be based on the trophic level, with trophic level 4 (carnivores that eat other carnivores) being most appropriate for decisions related to human and ecological health assessments. The choice of fish species for sampling should be based on the purpose of the sample use. Human biomonitoring should be accompanied by the fish consumption pattern, thus, mercury levels in typical commercial fishing species are appropriate related to human and ecological health assessments. Reason: For assessing human exposures, the mercury levels of commercial fish are important.
1353	New paragraph suggested: Water 15. There are GEOTRACES and CLIVAR programs, and ad hoc research programs for marine monitoring. While development of an enhanced database on speciated mercury concentrations in seawater is strongly encouraged, such measurements are typically collected by analytical specialists to ensure data quality. Reason: Some ongoing programmes actually collecting mercury data in water.
Editorial	
81, 431, 694	Global Mercury Waste Assessment '(2018)' should be '(2017)'.
742, 744	'Scientific and expert functions' should be 'scientific and technical functions' as it appears on 707.
1292 – 1293	data on levels of mercury and mercury compounds in 'air, biota and humans' either are available or would be able to be obtained, and… should be 'environment, biotic media and vulnerable populations' to be consistent with the wording used in the Article 22 of the Convention.

Attachment

Revised Table 1: Construction of the effectiveness evaluation framework from policy questions, to indicators and to required reports for consideration by the Effectiveness Evaluation Committee				
Policy Questions	**<u>First Policy Question:</u> Have the Parties taken actions to implement the Minamata Convention?**	**<u>Second Policy Question:</u> Have these actions resulted in changes in emissions and releases of mercury to the environment?**	**<u>Third Policy Question:</u> Have these changes in emissions and releases resulted in changes in levels of mercury in the environment, biota and humans attributable to the Convention?**	**<u>Fourth Policy Question:</u> Will existing measures under the Minamata Convention be sufficient to meet its objectives of protecting human health and the environment from mercury?**
Indicators	Process indicators *(para 46)*	Outcome indicators *(para 46)* Monitoring indicators *(para 46)*	Monitoring indicators *(para 52)*	
Indicator Clusters	1. Supply Cluster 2. Demand Cluster 3. Pressure Cluster ---- 4. Support Cluster 5. Info and Research Cluster	1. Supply Cluster 2. Demand Cluster 3. Pressure Cluster ---- 4. Support Cluster 5. Info and Research Cluster	1. Pressure Cluster	1. independent Article 1
Information Sources	Parties: Article 21 reports *(main source)*	Parties: Article 21 reports *(main source)*	- Parties: Article 21 reports - Existing/proposed monitoring networks and models	- Academic articles and other information on socio-economic, technology, climate, global policies, etc. - Emissions and releases - Trade, supply and demand - Waste management -Monitoring report

<table>
<tr><td>Secretariat documents to COP, according to Article 22</td><td>- ICC reports
- Financial mechanism reports
- Report on Capacity-building and technical assistance</td><td>n/a</td><td>n/a</td><td></td></tr>
<tr><td rowspan="2">Reports prepared for the Effectiveness Evaluation Committee</td><td colspan="2">Level 1 – 3
1. Emissions and Releases (Pressure Cluster) “Mercury to the environment”
2. Trade, Supply and Demand (Supply and Demand Clusters) “Intended/economic movement of mercury”
3. Waste Management (Supply, Demand and Pressure Clusters)</td><td>Level 3
4. Global Monitoring Report</td><td></td></tr>
<tr><td colspan="3">Level 4
5. Integrated assessment Report</td></tr>
<tr><td></td><td colspan="3">Level 5
Report of the Effectiveness Evaluation Committee is considered by the Conference of the Parties
The Effectiveness Evaluation Committee will use the Integrated Assessment Report supplemented by the synthesis reports* to consider the policy questions posed in the framework, and from that derive conclusions about the effectiveness of the Convention.</td></tr>
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