

FIRST FULL NATIONAL REPORTS OF THE MINAMATA CONVENTION ON MERCURY 2021



REPORTING PERIOD:

16 August 2017 to 31 December 2020

▼ INFORMATION ON THE PARTY

1. Information on the party

Name of party

Bulgaria

Date on which its instrument of ratification, accession, approval or acceptance was deposited

18 May 2017

Date of entry into force of the Convention for the party

16 August 2017

2. Information on the national focal point

Full name of the institution

Ministry of Environment and Water

Title of National Focal Point

Ms.

Name of National Focal Point

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3. Information about the contact officer submitting the reporting format if different from the above

Focal Point is submitting the national report

- ☒ Information is submitted by the national focal point
- ☐ Information is submitted through the national focal point by the contact officer

▼ ART. 3: MERCURY SUPPLY SOURCES AND TRADE

3.1. Does the party have any primary mercury mines that were operating within its territory at the date of entry into force of the Convention for the party?

- ☐ Yes
- ☒ No

Additional information on this question if needed

{Empty}

3.2. Does the party have any primary mercury mines that are now in operation that were not in operation at the time of entry into force of the Convention for the party?

- ☐ Yes
- ☒ No

3.3. Has the party endeavoured to identify individual stocks of mercury or mercury compounds exceeding 50 metric tons and sources of mercury supply generating stocks exceeding 10 metric tons per year that are located within its territory?

- ☒ Yes
- ☐ No

ba34_subsection

*If the party answered Yes to Question 3 above:

i. Please attach the results of your endeavor or indicate where it is available on the internet, unless unchanged from a previous reporting round.

In 2021, an inventory of mercury, mixtures of mercury and mercury compounds was carried out. According to the results of the inventory there are no identified stocks of mercury or mercury compounds over 50 metric tons in the country and sources of mercury generating stocks over 10 metric tons per year on its territory.

i. Please attach the results of your endeavor or indicate where it is available on the internet, unless unchanged from a previous reporting round.

{Empty}

ii. Supplemental: Please provide any related information, for example on the use or disposal of mercury from such stocks and sources.

{Empty}

3.4. Does the party have excess mercury available from the decommissioning of chlor-alkali facilities?

☐ Yes

☒ No

3.5. *Has the party received consent, or relied on a general notification of consent, in accordance with article 3, including any required certification from importing non-parties, for all exports of mercury from the party's territory in the reporting period?

☐ Yes, exports to parties

☐ Yes, exports to non-parties

☒ No

Additional information if needed

The country does not export mercury from its territory.

3.6. Has the party allowed the import of mercury from a non-party?

☒ No

☐ Yes

☐ The importing party has relied on paragraph 7 of article 3

Part E – Additional comments on the article in free text if the party chooses to do so

According to the national legislation (Act on the protection from the harmful impact of chemical substances and mixtures (Chapters two, seven and eight) – <https://www.moew.government.bg/en/act-on-the-protection-from-the-harmful-impact-of-chemical-substances-and-mixtures/>), which introduces the European Regulation 2017/852 on mercury, Bulgaria has introduced a ban on the primary mercury mining, export of mercury, as well as the export of mercury compounds, according to the requirements of the Regulation. Imports of mercury and mercury mixtures pursuant to Annex I to Regulation (EC) 2017/852 for use allowed in the country shall be carried out with the agreement of the Minister of Environment and Waters or an official authorized by him/her.

No import of mercury and mercury compounds were made during the reporting period.

▼ ART. 4: MERCURY-ADDED PRODUCTS

4.1. Has the party taken any appropriate measures to not allow the manufacture, import or export of mercury-added products listed in Part I of Annex A of the Convention after the phase-out date specified for those products?

☒ Yes

☐ No

☐ Yes (implementing paragraph 2 of article 4)

If yes, please provide information on the measures.

According to the national legislation, which introduces the European Regulation 2017/852 on mercury, Bulgaria has introduced appropriate measures to not allow the manufacture, import or export of mercury-added products listed in Part I of Annex A of the Convention after the phase-out date specified for those products

Act on the protection from the harmful impact of chemical substances and mixtures (Chapters seven and eight) – <https://www.moew.government.bg/en/act-on-the-protection-from-the-harmful-impact-of-chemical-substances-and-mixtures/>

"Chapter seven. Control over the chemical substances and mixtures

(amend. SG 114/03; amend. SG 63/10, in force from 13.08.2010, prev. text of Art. 25 – SG 53/18, in force from 26.06.2018)

Art. 25. (1) Subject to control shall be the implementation of requirements for:

23. the electricity and electronic equipment (EEE), placed on the market under Art. 21f, Para. 2, p. 1 – 7 and 9 – 11. determined in Chapter Five "a" and in the Ordinance under Art. 21e, Para. 1 and limiting the production and placing on the market of mercury-added products under items 2 – 6 and non-electronic measuring devices which are not medical devices under item 9 of Part A and Part B of Annex II to Regulation (EC) 2017/852;

24. the EEE, placed on the market under Art. 21f, Para. 2, p. 8. determined in Chapter Five "a" and in the ordinance under Art. 21e, Para. 1 and limitation of the production and placing on the market of local antiseptics and medical devices respectively under items 8 and 9 of Part A of Annex II to Regulation (EC) 2017/852;..

26. a ban on the manufacture, placing on the market and use of cosmetic products and biocidal products with added mercury referred to in points 7 and 8 respectively and products referred to in point 9 of Part A of Annex II to Regulation (EC) No 2017/852;

27. a ban on the manufacture of products with added mercury under items 1 to 6 and 9 of Part A of Annex II pursuant to Art. 5 of Regulation (EC) 2017/852;

28. a ban on the use of mercury and mercury compounds in the manufacturing processes under Part I of Annex III, 7 of Regulation (EC) 2017/852 as from the dates set out in that Annex, with the exception of their use in production processes in Part II of Annex III, under the conditions set out in that Annex;

29. environmentally sound storage of mercury, mercury compounds and mixtures of mercury according to Art. 7, para. 3 of Regulation (EC) 2017/852;

30. the production of new mercury-added products and new production processes involving the use of mercury or mercury compounds received authorization under Art. 8 (6) of Regulation (EC) 2017/852;

31. a ban on artisanal and small-scale gold mining in which mercury amalgamation is used to extract gold from ore according to Art. 9 of Regulation (EC) 2017/852;

32. a ban on the placing on the market of mercury-added products under point 1 of Part A of Annex II to Regulation (EC) 2017/852".

4.3. Has the party taken two or more measures for the mercury-added products listed in Part II of Annex A in accordance with the provisions set out therein?

☒ Yes

☐ No

If yes, please provide information on the measures.

The Party has taken more than 2 measures for mercury added products (dental amalgam) listed in Part II of Annex A, in accordance with the provisions of Art. 4, paragraph 3 of the Convention.

• Since 2009 „The National Program for Prevention of Oral Diseases in Children aged 0–18“ is in force in the country. From 05.03.2021 with a Decision of the Council of Ministers, the Program has been extended for the next 5-year period – 2021–2025;

• By Order № RD-01-295 of 23.10.2019, the Minister of Health approved the "National Plan for measures to phase out the use of dental amalgam in the Republic of Bulgaria", published on the website of the Ministry of Health (https://www.mh.government.bg/media/filer_public/2019/10/24/zapoved_nacionalen_plan-prekratiavane_upotreba_amalgama.pdf).

A number of measures have been taken in line with Part II of Annex A of the Minamata Convention. The measures are structured according to item IV – Action Plan in three main directions:

1. Prevention of dental caries and improvement of oral health in children and adults;
2. Gradual reduction to a minimum of the use of dental amalgam for tooth restoration in children and adults;
3. Encourage representative professional organizations and universities to educate and train dentists and students in the use of wireless alternatives to dental restorations, such as better awareness of reducing and facing down the use of dental amalgam.

Within the measures for the period 2019–2020 activities have been implemented under measure 3 "Promotion of healthy nutrition in children in order to prevent dental caries", as follows:

- within the framework of the National Program for Prevention of Chronic Non-Communicable Diseases 2014–2020, recommendations for healthy nutrition of children and students were published by the National Center for Public Health and Analysis (NCPHA) and disseminated through the Regional Health Inspectorates (RHI) ;
- Ordinance № 6 on healthy nutrition of children from 3 to 7 years of age has been updated;
- „The Collection of Recipes and Guidelines for Healthy Nutrition of Children from 3 to 7 years of age“ has been updated and printed, approved by the Ministry of Health (MoH) for the implementation of modern health principles in organized nutrition of children at this age.
- In the framework of the "National Program for Prevention of Oral Diseases in Children 0–18 years of age in the Republic of Bulgaria, 2014–2020" was developed information material "Child Nutrition", which was disseminated during information campaigns/talks to promote healthy eating in children to prevent dental caries.

Under measure 1 "Better identification of indicators of the use of dental amalgam", item 1 "Provision of data on the use of amalgam for dental treatment by age groups" and item 2 of the same measure "Analysis of data on the use of dental amalgam" has been amended Annex № 1 to Form № 365 "Activities of dentists". The new format of the table "Therapeutic activity" until 2030 will differentiate the type of restoration material used – with amalgam or other material for all age groups and for vulnerable groups up to 17 years of age (permanent and temporary teeth) and in pregnant and breastfeeding women. The first separately collected data are expected in 2022 (data for 2021) and will allow the inclusion of this information in the mid-term evaluation of the implementation of the National Plan, which will be carried out in December 2023.

1. Regarding Measure 1 „Informing the public about the reasons for reducing the use of dental amalgam“ within the "National Program for Prevention of Oral Diseases" of the main direction № 1 of the National Plan, the leading responsible institution is the Bulgarian Dental Association, and NCPHA and Regional Health Inspectorates have been identified as partners in the measure. It is planned to conduct information campaigns on the negative impact of the environment and human health from harmful emissions of mercury and its compounds contained in dental amalgam.

2. Dental amalgam is not used for persons under 15 years of age, pregnant and breastfeeding women, in accordance with European regulations. The members of the Bulgarian Dental Association have been notified of the Minamata Convention and the European regulation on the use of dental amalgam. The National Framework Agreement with the National Health Insurance Fund contains explicit texts that prohibit the use of dental amalgam for children under 15, pregnant women and breastfeeding women.

3. In the country, dental amalgam is used only in encapsulated form.

4. With regard to guideline № 2, measure 2 "Implementation of control over the activities for collection and treatment of waste in dental practices", the Regional Health Inspectorates carry out control within their legal powers under Ordinance № 1 of 9 February 2015 on the requirements to the activities for collection and treatment of waste on the territory of the medical and health establishments. According to the Waste Management Act, the holders of waste shall be obliged to keep records for the waste by the order determined by this law and the by-laws on its application. In this regard is the provision of Ordinance № 1 of 9 February 2015, according to which the medical and health establishments are obliged to keep records and fill in an identification document for the transfer of hazardous waste in accordance with the requirements of Ordinance № 1 of 2014 on the procedure and templates for providing information on waste activities and the procedure for keeping public registers (SG, issue 51 of

2014). The control over the keeping of the reporting documents is performed by the director of the Regional inspectorate for environment and waters (RIEW). Issues related to information and public registers in the field of waste are regulated in the Waste Management Act (WMA). According WMA, the director of the RIEW controls the reporting and provision of information under Chapter Four, Section I, as well as the implementation of the obligations of mayors of municipalities under Chapter Two, Section III and Chapter Four, Section IV, related with waste management

4.4. Has the party taken measures to prevent the incorporation into assembled products of mercury-added products whose manufacture, import and export are not allowed under article 4?

☒ Yes

☐ No

If yes, please provide information on the measures.

According to the Act on the protection from the harmful impact of chemical substances and mixtures, Bulgaria has introduced appropriate measures to not allow the manufacture, import or export of mercury-added products listed in Part I of Annex A of the Convention after the phase-out date specified for those products.

With regard to restrictions on the use and placing on the EU market of products with added mercury, restrictions on the use of mercury in measuring instruments have been introduced in Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).

The following additional legislative acts are also applicable in the country – Regulation (EC) № 1223/2009 on cosmetic products, Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators, Directive 2011/65/EU on restrictions on the use of certain hazardous substances in electrical and electronic equipment. Regulation (EC) No 396/2005 on maximum residue limits of pesticides in and on food or feed of plant or animal origin, and amending Council Directive 91/414/EEC, is applicable to the establishment of maximum levels of mercury.

4.5. Has the party discouraged the manufacture and the distribution in commerce of mercury-added products not covered by any known use in accordance with article 4, paragraph 6?

☒ Yes

☐ No

If yes, please provide information on the measures.

In the Law on Protection from the Harmful Effects of Chemical Substances and Mixtures, Bulgaria has introduced appropriate measures to discourage the production and distribution on the market of products with added mercury, in accordance with Article 4 (6) of the Convention. The measures include the introduction of a procedure for authorization of production (According to Regulation 2017/852), setting criteria and requirements for assessing the risks and benefits of the product for the environment or human health. The country carries out administrative and regulatory control over the production and import of mercury-added products.

The applicable articles are 7, 7a, 7b (national procedure) and art. 25 para. 1, point 30 (control) of the national Act.

For more information, please refer to Act (new SG 53/18, in force from 26.06.2018)

<https://www.moew.government.bg/en/act-on-the-protection-from-the-harmful-impact-of-chemical-substances-and-mixtures/>).

Part E – Additional comments on the article in free text if the party chooses to do so

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▼ ART. 5: MANUFACTURING PROCESSES IN WHICH MERCURY OR MERCURY COMPOUNDS ARE USED

5.1. Are there facilities within the territory of the party that use mercury or mercury compounds for the processes listed in Annex B of the Minamata Convention in accordance with paragraph 5 of article 5 of the Convention?

- ☐ Yes
- ☒ No
- ☐ I do not know

5.2. Are measures in place to not allow the use of mercury or mercury compounds in manufacturing processes listed in Part I of Annex B after the phase-out date specified in that Annex for the individual process?

CHLOR-ALKALI PRODUCTION

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

ACETALDEHYDE PRODUCTION IN WHICH MERCURY OR MERCURY COMPOUNDS ARE USED AS A CATALYST

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

5.3. Are measures in place to restrict the use of mercury or mercury compounds in the processes listed in Part II of Annex B in accordance with the provisions set out therein?

VINYL CHLORIDE MONOMER PRODUCTION

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

SODIUM OR POTASSIUM METHYLATE OR ETHYLATE

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

PRODUCTION OF POLYURETHANE USING MERCURY-CONTAINING CATALYSTS

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

5.4. Is there any use of mercury or mercury compounds in a facility using the manufacturing processes listed in Annex B that did not exist prior to the date of entry into force of the Convention for the party?

- ☐ Yes
- ☒ No

5.5. Is there any facility that has been developed using any other manufacturing process in which mercury or mercury compounds are intentionally used that did not exist prior to the date of entry into force of the Convention?

- ☐ Yes
- ☒ No

Part E – Additional comments on the article in free text if the party chooses to do so

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▼ ART. 7: ARTISANAL AND SMALL-SCALE GOLD MINING

7.1. Have steps been taken to reduce, and where feasible eliminate, the use of mercury and mercury compounds in, and the emissions and releases to the environment of mercury from, artisanal and small-scale gold mining and processing subject to article 7 within your territory?

- ☐ Yes
- ☐ No
- ☒ There is no artisanal and small-scale gold mining and processing subject to article 7 in which mercury amalgamation is used in the territory

7.2. Has the party determined and notified the secretariat that artisanal and small-scale gold mining and processing within its territory is more than insignificant?

☐ Yes

☒ No

Part E – Additional comments on the article in free text if the party chooses to do so

{Empty}

▼ ART. 8: EMISSIONS

8.1. Identify any Annex D source categories for which there are new sources of emissions of mercury or mercury compounds as defined in paragraph 2 (c) of article 8.

For each of those source categories describe the measures in place, including the effectiveness of such measures, to implement the requirements of paragraph 4 of article 8.

☐ Coal-fired power plants

☐ Coal-fired industrial boilers

☐ Smelting and roasting processes used in the production of non-ferrous metals

☐ Waste incineration facilities

☐ Cement clinker production facilities

Has the party required the use of best available techniques or best environmental practices (BAT/BEP) to control and where feasible reduce emissions for new sources no later than 5 years after the date of entry into force of the Convention for the party?

☐ Yes

☒ No

Please explain

Bulgaria has no new sources in any of the categories listed in Annex D.

Attach relevant documentation

{Empty}

8.2. Identify any Annex D source categories for which there are existing sources of emissions of mercury or mercury compounds as defined in paragraph 2 (e) of article 8.

For each of those source categories, select and provide details on the measures implemented under paragraph 5 of article 8 and explain the progress that these applied measures have achieved in reducing emissions over time in your territory:

▼ COAL-FIRED POWER PLANTS

- ☒ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

The following measures are generally applied to installations with a complex permit:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values for control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques and best environmental practices to control emissions from relevant sources.

Progress

The measures are effective and lead to a reduction in the amount of emissions of mercury and mercury compounds in the air from about 900 to about 520 kilograms per year for the period 2017–2020.

▼ COAL-FIRED INDUSTRIAL BOILERS

- ☐ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

{Empty}

Progress

{Empty}

▼ SMELTING AND ROASTING PROCESSES USED IN THE PRODUCTION OF NON-FERROUS METALS

- ☒ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Use of BAT/BEP to control emissions from relevant sources

- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

The following measures are generally applied to installations with a complex permit:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values for control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques and best environmental practices to control emissions from relevant sources.

Progress

The measures are effective and lead to a reduction in emissions of mercury and mercury compounds into the air from about 17 to about 16 kilograms per year for the period 2017–2020.

▼ WASTE INCINERATION FACILITIES

- ☒ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

The following measures are generally applied to installations with a complex permit:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values for control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques and best environmental practices to control emissions from relevant sources.

Progress

The measures are effective and lead to a reduction in the amount of emissions of mercury and mercury compounds in the air from about 25 to about 22 kilograms per year for the period 2017–2020.

▼ CEMENT CLINKER PRODUCTION FACILITIES

- ☒ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☒ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources

- ☒ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

The following measures are generally applied to installations with a complex permit:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values for control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques and best environmental practices to control emissions from relevant sources.

Progress

The measures are effective and lead to a reduction in the amount of emissions of mercury and mercury compounds in the air from about 80 to about 69 kilograms per year for the period 2017–2020.

Have the measures for existing sources under paragraph 5 of article 8 been implemented no later than 10 years after the date of entry into force of the Convention for the party?

- ☒ Yes
- ☐ No

8.3. Has the party prepared an inventory of emissions from relevant sources within 5 years of entry into force of the Convention for it?

- ☐ Yes
- ☐ No
- ☒ Have not been a party for 5 years

8.4. Has the party chosen to establish criteria to identify relevant sources covered within a source category?

- ☐ Yes
- ☒ No

8.5. Has the party chosen to prepare a national plan setting out the measures to be taken to control emissions from relevant sources and its expected targets, goals and outcomes?

- ☐ Yes
- ☒ No

Part E – Additional comments on the article in free text if the party chooses to do so

The criteria for identifying sources within the categories described in Annex D to the Convention are in accordance with Annex № 4 of the Environmental Protection Act (EPA) and within the scope of Annex № 1 of Regulation (EC) № 166/2006 of the European Parliament and of the Council of 18 January 2006 establishing a European Pollutant Release and Transfer Register (Regulation 166/2006). Thus, although the country has not chosen to establish criteria for identifying the relevant sources, under Art. 8 (2) (b), the objectives of the Convention for the identification of relevant sources may be considered to be achieved.

Operators of installations/facilities covered by Annex №4 of the Environmental Protection Act (EPA), including this type of installation under Annex D of the Minamata Convention, must apply the best available techniques (BAT) applicable to the relevant activity. Decisions of the European Commission to draw conclusions on best available techniques (BAT decisions), in accordance with Article 13 (5) of Directive 2010/75/EU on industrial emissions, are also taken into account in integrated permitting procedures for installations under Chapter Two of the Directive, respectively Annex №4 of the EPA. Integrated permits set conditions that require not to exceed the established emission limit values of relevant pollutants, including mercury – the applicable air legislation and BAT Decisions, set conditions not to violate air quality. Conditions are set which regulate the performance of the respective monitoring.

In this regard, it can be summarized that the following measures are generally applied to installations with a integrated permit:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values for control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques (BAT) and best environmental practices to control emissions from relevant sources.

For all manufacturing and industrial plants (incl. for smelting and roasting processes used in the production of non-ferrous metals and for cement clinker production facilities) are set emission limit values (ELVs) for mercury. In Ordinance № 1 of 27.06.2005 for emission limit values of harmful substances (pollutants) in the atmosphere of objects and activities with stationary sources of emissions (effective from 6.08.2006), are defined as follows:

- substance: Mercury and its compounds, identified as Hg
- ELV as total mass flow for the stationary source – 0,25 g/h
- ELV as concentration level – 0,05 mg/Nm³

These ELVs are reflected in the emission factors used to determine annual emissions of that pollutant.

For more information, please see the register: http://pdbase.government.bg/forms/public_eptr.jsp

Applicable European legislation:

- Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control) is a key legal instrument for reducing mercury emissions. The application of best available techniques is expected to lead to an accelerated replacement of mercury-based technologies and to a reduction in mercury emissions in many industrial sectors, in particular cement, non-ferrous metallurgy, large combustion plants and waste incineration. The aim is to control, reduce and, where appropriate mercury-free alternatives exist, eliminate point sources and diffuse emissions of mercury and mercury compounds. Directive 2010/75 / EU stipulates that for large combustion plants using coal, including lignite, total mercury emissions are measured at least once a year.

The emission limit values for waste water discharges from waste gas treatment set out in Annex 6 to the Directive set a level of 0.03 mg/l for mercury.

- The Directive 2016/2284 / EU to reduce national emissions of certain air pollutants. Mercury emissions to air under the Convention on Long-range Transboundary Air Pollution are reported under this Directive.
- Regulation № 166/2006 establishing a European Pollutant Release and Transfer Register (EERP), adopted on 18 January 2006, requires operators carrying out activities falling within the scope of Annex I thereto to report annual releases and transfers of pollutants to the European Commission (EC).

National legislation on emissions:

- Clean Air Act:
- Ordinance № 1 of 27.06.2005 on norms for permissible emissions of harmful substances (pollutants)

released into the atmosphere from sites and activities with stationary emission sources introduces in Annex 1 a norm for permissible emissions of mercury – 0.05 mg/m³.

- Ordinance № 4 of 5 April 2013 on the conditions and requirements for the construction and operation of incineration plants and waste co-incineration plants specifies the mercury emission limit of 0.05 mg/m³.
- Ordinance on the procedure and manner of organizing the national inventories of emissions of harmful substances and greenhouse gases into the atmosphere is related to the reporting of emissions of harmful substances into the atmosphere

▼ ART. 9: RELEASES

9.1. Are there, within the party's territory, relevant sources of releases as defined in paragraph 2 (b) of article 9?

- ☒ Yes
- ☐ No
- ☐ I do not know

Please indicate the measures taken to address releases from relevant sources and the effectiveness of those measures.

The party has information on sources of releases, which falls within the scope of Annex № 4 of the Environmental Protection Act (EPA) and the scope of Annex № 1 of Regulation (EC) № 166/2006 of the European Parliament and of the Council of 18 January 2006 establishing the European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC (Regulation 166/2006).

Regulation № 166/2006 adopted on 18 January 2006, requires operators carrying out activities falling within the scope of Annex I thereto to report annual releases and transfers of pollutants to the European Commission (EC).

For more information, please refer to register: http://pdbase.government.bg/forms/public_eptrtr.jsp

Thus, although the country has not identified the relevant sources, under Art. 9 (2) (b), the objectives of the Convention may be considered to be achieved.

Under the conditions set out in Integrated permits (IP) individual emission restrictions are set for the wastewater flows from the site (for which the respective IP is issued) according to the applicable legislation in the field of water, the applicable limit values according to the BAT Decisions. Conditions are set for reducing/phasing out the release of priority hazardous substances, including mercury and its compounds, in accordance with the Ordinance on Environmental Quality for priority substances and certain other pollutants. Conditions are set which regulate the performance of the respective monitoring.

The measures taken to deal with releases from Annex D installations for which integrated permits have been issued are the following:

- (a) control of emission limit values and, where practicable, reduction of emissions from relevant sources (through the presence of treatment facilities; carrying out own monitoring);
- (b) use of best available techniques and best environmental practices to control releases from relevant sources.
- (c) alternative measures to reduce emissions from relevant sources.

The results of the monitoring of waters and soils in the period 2017 – 2020 show that they are in good ecological condition and no excessive mercury pollution has been registered.

9.2. Has the party established an inventory of releases from relevant sources within 5 years of entry into force of the convention for it?

- ☐ Yes
- ☐ Relevant sources do not exist in the territory
- ☒ Have not been a party for 5 years
- ☐ No

Part E – Additional comments on the article in free text if the party chooses to do so

National legislation on releases of mercury and mercury compounds into water:

- Water Act (OJ No. 67 of 27.07.1999, in force from 28.01.2000, last amended and supplemented, SG No. 17 of 26.02.2021). It ensures uniform and balanced water management as a major component of the environment and as a resource in the public interest, protection of public health and sustainable development of the country.
- Ordinance on environmental quality standards for priority substances and certain other pollutants (in force since 9.11.2010, as amended in OJ No. 97 of 11.12.2015) Establishes environmental quality standards (EQS) for priority substances and certain other pollutants in order to achieve good chemical status of surface waters in accordance with the provisions and objectives of Chapter Ten, Section III of the Water Act (WA). For mercury and its compounds in internal surface water and other surface water, the maximum permissible concentrations are 0.07 mg/l, and in biota the maximum permissible mercury concentrations are 10 mg/l.
- Ordinance № 4/2000 on the quality of water for fish farming and for breeding of shellfish organisms (SG No. 88/2000). The Ordinance lays down the requirements regarding the quality of fresh waters inhabited by fish and coastal sea waters and marine waters released into the land, ensuring the normal existence and reproduction of crustacean molluscs by introducing both quality standards for these waters and of procedures for the identification of those waters in connection with the maintenance of the life of fish, crustaceans and molluscs.
- Ordinance № 1 of 11 April 2011 on water monitoring (SG No. 34 of 29.04.2011, last amended SG No. 20 of 15.03.2016). The Ordinance regulates the procedure and manner for the establishment of the water monitoring networks and the activity of the national water monitoring system. Creates an opportunity for assessment and forecast of the condition of surface and groundwater, providing the legal basis for water monitoring, determines the order and manner of its design and construction, regulates the principles of self-monitoring, information and communication provision and management of the national water monitoring system.
- Ordinance № 6/2000 on emission standards for the permissible content of harmful and dangerous substances in waste water discharged into water bodies (SG No. 97/2000). The ordinance regulates the emission values for the admissible content of certain harmful and dangerous substances in the wastewater discharged into water bodies. The ordinance aims to prevent and / or stop and reduce the pollution of the water bodies with dangerous and harmful substances by introducing limit values. In Annex № 2 to Art. 5, para. 1 (Amended, SG No. 24/2004, effective 23.03.2004) a number of different emission standards for mercury are indicated, depending on the type of production.
- Ordinance № 7/2000 on the conditions and procedure for discharge of industrial wastewater into the sewerage systems of the settlements (SG No. 98/2000). The ordinance regulates the discharge of industrial wastewater in the sewerage systems of the settlements, and by determining limit values for permissible content of toxic, harmful and dangerous for the environment substances, the pollution of the wastewater in them is prevented. The limit value for mercury is 0.05 mg/dm³ in the sewerage network without and with a municipal treatment plant.
- Ordinance № 11/2002 on the quality of bathing water (SG No. 25/2002). The ordinance regulates the requirements for the quality of natural waters intended for bathing, the control and the procedure for determining the zones and bathing water in order to protect human health.
- Ordinance № 12/2002 on the quality requirements for surface water intended for drinking and domestic water supply. The Ordinance determines the requirements for the quality of fresh surface water, which are promising for obtaining water for drinking and household needs and their categorization: A1, A2 and A3. The categorization of water is related to the application of standard treatment methods that allow obtaining water in accordance with regulatory requirements.

– Ordinance № 18/27.05.2009 on the quality of water for irrigation of agricultural crops (SG No. 43 / 09.06.2009). The norm for mercury is 0.001 mg/dm³

▼ ART. 10: ENVIRONMENTALLY SOUND INTERIM STORAGE OF MERCURY, OTHER THAN WASTE MERCURY

10.1. Has the party taken measures to ensure that the interim storage of non-waste mercury and mercury compounds intended for a use allowed to a party under the Convention is undertaken in an environmentally sound manner?

- ☒ Yes
☐ No
☐ I do not know

Please indicate the measures taken to ensure that such interim storage is undertaken in an environmentally sound manner and the effectiveness of those measures.

Guidelines for the environmentally sound interim storage of mercury, other than mercury waste, adopted by the Conference of the Parties at its second meeting has been introduced into national legislation by the Ordinance on the Procedure for the Storage of Hazardous Chemicals and Mixtures – Adopted by the Council of Ministers № 152 of 30.05.2011 (SG. 43 of June 7 2011, amended and ext. SG. 10 of 5 February 2021).

Annex № 2 to Art. 6, item 11 (New, SG No. 10/2021, effective 5.02.2021) to the Ordinance:

"Requirements for the environmentally sound interim storage of mercury, mercury mixtures and or mercury compounds other than mercury-containing wastes".

For more information, please refer to the link: <https://www.moew.government.bg/en/ordinance-on-the-order-and-manner-of-storage-of-hazardous-substances-and-mixtures/>.

Part E – Additional comments on the article in free text if the party chooses to do so

There are no identified uses in the country of mercury or mercury compounds as defined in Article 3 of the Convention. No stockpiles of mercury and mercury compounds have been identified in this regard.

▼ ART. 11: MERCURY WASTES

11.1. Have measures outlined in article 11, paragraph 3, been implemented for the party's mercury waste?

- ☒ Yes
☐ No

Please describe the measures implemented pursuant to paragraph 3, and please also describe the effectiveness of those measures.

Integrated permits (IP), issued according to Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control) set conditions in the event that waste is generated and/or accepted from the activities carried out on the production site. For the purpose of their treatment, including mercury waste, conditions are set that require their management is in accordance with the applicable waste management legislation and in accordance with the best available techniques. In case a waste is

generated by a process/installation on the site for which the relevant IP is issued, or is treated on the site itself, restrictive conditions are set regarding its quantity (tons/per unit of product and/or tons/year).

Waste transportation is not allowed under IPs conditions, as it is subject to another regime under the Waste Management Act.

11.2. Are there facilities for final disposal of waste consisting of mercury or mercury compounds in the party's territory?

- ☐ Yes
- ☒ No
- ☐ I do not know

Part E – Additional comments on the article in free text if the party chooses to do so

Waste containing mercury, originating in the Republic of Bulgaria, mainly fluorescent tubes and other mercury-containing waste (code 20 01 21*) are transported to facilities outside the country for carrying out activities with Recovery and Disposal Codes R4/R5.

National waste legislation:

- The Waste Management Act and a number of by-laws to it introduce measures to control, reduce and environmentally sound disposal of waste (including waste containing mercury). The Waste Management Act (promulgated, SG No. 53 of 13.07.2012, last amended and supplemented, SG No. 19 of 5.03.2021) regulates the environmentally sound waste management as a set of rights and obligations, decisions, actions and activities related to their formation and treatment, as well as the forms of control over these activities. Defines the requirements for products that in the process of their production or after their final use form hazardous or widespread waste, as well as the hierarchy of waste management.
- Ordinance № 2 of 23 July 2014 on the classification of waste (promulgated, OJ No. 66 of 8 August 2014, last amended and supplemented, SG No. 86 of 6 October 2020) determines the conditions and the order for classification of the waste by types and properties.
- Ordinance № 6 of 27 August 2013 on the conditions and requirements for construction and operation of landfills and other facilities and installations for recovery and disposal of waste (Promulgated SG No. 80 of 13 September 2013, amended and Supplemented SG No 13, 7 February 2017). Defines the requirements that should be met by the sites for placement of waste treatment facilities. Refers to sites intended for the location of facilities for the treatment of household, construction, industrial and hazardous waste by performing the following activities and operations: collection, temporary storage, recovery, disposal and disposal.
- Ordinance № 1 of 04.06.2014 on the procedure and templates for providing information on waste activities, as well as the procedure for keeping public registers.

▼ ART. 12: CONTAMINATED SITES

12.1. Has the party endeavoured to develop strategies for identifying and assessing sites contaminated by mercury or mercury compounds in its territory?

- ☒ Yes
- ☐ No

Please elaborate

The country has been implementing a soil monitoring program since 2004. The results of the monitoring show that no soils contaminated by mercury or mercury compounds have been identified.

Part E – Additional comments on the article in free text if the party chooses to do so

Since 2004, a soil monitoring program was developed and approved by the Minister of Environment and Water, Bulgaria, which is organized on three levels. The monitoring program is fully in line with the latest European requirements, good practices in a number of European countries, as well as national legislation adopted in 2007–2009.

National legislation regarding releases of mercury and mercury compounds into soils:

- Soil Act – this act shall provide for the public relations, connected to protection of soils and their functions, as well as their sustainable use and permanent recreation as a component of the environment. (SG No. 89 of November 6, 2007, last amended and supplemented SG No. 98 of November 27, 2018) <https://www.fao.org/faolex/results/details/en/c/LEX-FAOC116552>
- Ordinance № 4 of 12 January 2009 on soil monitoring – this ordinance regulates the order for soil monitoring through the establishment of a National Soil Monitoring System.
- Ordinance № 3 on Norms on the permissible content of harmful substances in soils (SG No. 71 of 12 August 2008). The Ordinance lays down the standards for permissible soil content and soil sampling requirements for the determination of harmful substances. Art. 1 of the Ordinance determine: the limit values for admissible content of harmful substances in the soils and the requirements for taking and testing of soil samples for determination of the content of harmful substances. According to Art. 2. the limit values for permissible content of harmful substances in the soils are determined on the basis of an assessment of the risk for the environment and human health in three levels:

1. precautionary concentrations (PC);
2. maximum permissible concentrations (MPC);
3. intervention concentrations (IR).

– Ordinance on inventory and surveys of soiled areas, necessary recovery measures, as well as maintenance of the implemented restoration activities (SG 15 of 16 February 2007). The Ordinance determines the order and manner of conducting the inventory and surveys of areas with contaminated soil, the necessary recovery measures, as well as the maintenance of the implemented recovery activities.

The monitoring program is organized on 3 levels as follows:

- Level I observations (wide-scale monitoring) are carried out in a uniform network of 16x16 km, at 397 points and provide data for the assessment of soil condition according to the following indicators: 9 heavy metals (inc. Hg) .The periodicity of observation– 5 years.
- Level II observations are oriented towards regional manifestations of degradation processes – acidification and salinisation. Processes of erosion – water and wind are observed through specially developed mathematical models for evaluation and forecast. Soil sealing shall be assessed on the basis of statistics and land cover mapping.
- Level III observations shall be identified by so-called local soil pollution within which an inventory of contaminated soil areas should be carried out. The inventory is still partial and irregular, based on available data. In 2007, a specialize ordinance was established and the methodology for inventory is to be established.
- Order № 564 / 13.10.2016 of the Minister of Environment and Water. This order approves the Methodology for preliminary and detailed studies and the creation of a public register for inventory of areas with contaminated soil.
- Order № 704 / 20.09.2019 of the Minister of Environment and Water. This order approves the schemes for monitoring the soils and the indicators for assessment of the condition of the soils according to art. 10, para. 1 and art. 11, para. 1 of the Ordinance on soil monitoring. The indicators have been developed and are used to assess the condition of soils at national and regional level. Assessment of soil condition at the regional level is carried out by the Regional Inspectorates of Environment and Water (RIEW), and at the national level – by the Executive Environment Agency (EEA). The frequency of observations varies depending on the processes. Soil testing shall be carried out in 15 EEA Regional accredited Laboratories.

Public application for soils — <https://ecosys.eea.government.bg/SoilMonPublic/>

▼ ART. 13: FINANCIAL RESOURCES AND MECHANISM

13.1. Has the party undertaken to provide, within its capabilities, resources in respect of those national activities that are intended to implement the Convention in accordance with its national policies, priorities, plans and programmes?

☒ Yes

☐ No

Please specify

Resources for implementing the Convention include national funding for applicable policies, incl. control as part of national budget.

Please provide comments, if any.

{Empty}

13.2. Supplemental: Has the party, within its capabilities, contributed to the mechanism referred to in paragraph 5 of article 13?

☐ Yes

☒ No

Please specify

The only payment that were made by Bulgaria is in the scope of the annual Government's contributions to the Minamata Convention General Trust Fund, determined by the COP.

Please provide comments, if any.

{Empty}

13.3. Supplemental: Has the party provided financial resources to assist developing-country parties and/or parties with economies in transition in the implementation of the Convention through other bilateral, regional and multilateral sources or channels?

☐ Yes

☒ No

Please specify

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Please provide comments, if any.

{Empty}

Part E – Additional comments on the article in free text if the party chooses to do so

{Empty}

▼ ART. 14: CAPACITY-BUILDING, TECHNICAL ASSISTANCE AND TECHNOLOGY TRANSFER

14.1. Has the party cooperated to provide capacity-building or technical assistance, pursuant to article 14, to another party to the Convention?

☐ Yes

☒ No

Please specify

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14.2. Supplemental: Has the party received capacity-building or technical assistance pursuant to article 14?

☐ Yes

☒ No

Please specify

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Please provide comments, if any.

{Empty}

14.3. Has the party promoted and facilitated the development, transfer and diffusion of and access to, up-to-date environmentally sound alternative technologies?

☐ Yes

☒ No

☐ Other

Please specify

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Part E – Additional comments on the article in free text if the party chooses to do so

{Empty}

▼ ART. 16: HEALTH ASPECTS

16.1. Have measures been taken to provide information to the public on exposure to mercury in accordance with paragraph 1 of article 16?

☒ Yes

☐ No

Supplemental: If yes, describe the measures that have been taken.

Regarding the Measure "Informing the public about the reasons for reducing the use of dental amalgam" of the National Plan for gradual reduction of the use of dental amalgam, information campaigns are planned on the negative impact of environmental and human health from harmful emissions of mercury and its compounds, contained in dental amalgam.

Since 2017, the topic of mercury, including toxicological, ecotoxicological and safety information, has been included in continuing education and acquisition courses conducted by the National Center for Public Health and Analysis (NCPHA).

Research and development related to diseases resulting from exposure to mercury and/or mercury compounds is carried out in accordance with nationally approved methodological documents, such as the International Classification of Diseases (ICD – 10 revision), adopted for Bulgaria by Ordinance № 42 of 8 December 2004 to the Minister of Health. The rules and instructions used for certification and coding are in accordance with ICD-10.

16.2. Have any other measures been taken to protect human health in accordance with article 16?

☒ Yes

☐ No

Supplemental: If yes, describe the measures that have been taken.

According to the Health and Safety at Work Act, the obligation to ensure health and safety conditions lies with the employer, who assesses the risks to the safety and health of workers and in accordance with the risk assessment plans and implements preventive measures, creates the necessary organization for monitoring and control over the implementation of the planned measures.

The provisions of Ordinance № RD-07-2 of 16.12.2009 on the terms and conditions for conducting periodic training and instruction of employees on the rules for ensuring healthy and safe working conditions and Ordinance № 5 of 1.05.1999 on the procedure, manner and frequency of risk assessment and risk control, including exposure to mercury and mercury compounds in the workplace.

The requirements are systematized in detail in Ordinance № 13 of 30.12.2003 on the protection of workers from the risks associated with exposure to chemical agents at work. The employer shall prevent or minimize the risk to the health and safety of workers working with hazardous chemical agents by:

1. design and organization of appropriate work processes;
2. provision of appropriate equipment, means for protection and their maintenance, which ensure health and safety at work;
3. limiting the number of workers who are or can be exposed;
4. minimization of the duration and degree of exposure;
5. undertaking hygienic measures for prevention or reduction of the possibility for exposure to dangerous chemical agents;
6. limiting the quantity of chemical agents to the minimum necessary for performing a certain type of work;
7. introduction of procedures for safe operation, storage and transportation of hazardous chemical agents, as well as of the waste containing them;
8. provide health monitoring, etc.

The employer provides each employee with appropriate training and/or instruction on safety and health at work in accordance with the specifics of the profession/activity performed at the workplace, taking into account the possible hazards and the results of risk assessment at the workplace.

As part of the campaign "Healthy Workplaces Manage Hazardous Substances 2018–2019" of the European Agency for Safety and Health at Work, a number of events were held such as two national conferences, several seminars and others, which provided information on new legislation in the field occupational safety and health, health risk from exposure to various chemical noxies, including heavy metals, regulatory requirements and application in risk assessment of safety data sheets for workers with hazardous chemical agents, good practices, etc.

The activities within this campaign were aimed at raising the awareness of employers and strengthening the capacity of specialists in the field of safety and health at work, in order to implement scientifically sound educational and preventive programs for exposure to hazardous substances, including mercury and mercury compounds in the workplace. Information materials related to the campaign were distributed, as well as a brochure "Legislative Framework on Hazardous Substances in the Workplace". Information materials are also published in scientific and applied journals such as "Health and Safety at Work", the web pages of the European Agency for Safety and Health at Work, the Executive Agency General Labor Inspectorate, the National Center for Public Health and Analysis, NGOs and others.

Part E – Additional comments on the article in free text if the party chooses to do so

{Empty}

▼ ART. 17: INFORMATION EXCHANGE

17.1. Has the party facilitated the exchange of information referred to in article 17, paragraph 1?

☒ Yes

☐ No

Please provide more information, if any

Through its membership in the European Regional Organization of the World Dental Organization, the Council of European Dentists (CED) and the World Dental Federation (FDI), the Bulgarian Dental Union constantly exchanges information – technical, economic and legal on dental amalgam and its safety in use.

The National Center for Public Health and Analysis (NCPHA) constantly exchanges information and maintains its awareness through WHO scientific information materials on exposure, health risk assessment, health and epidemiological aspects related to mercury. Separately, in connection with the preparation of the National Plan for measures for gradual phase down of the use of dental amalgam in the Republic of Bulgaria, NCPHA initiated an expert discussion in the period 2019–2020 and held consultations with international experts on the problem – Elena Lymberidi-SeUimo ("Zero Mercury Campaign", European Environmental Bureau), Linn Norrback (Swedish Chemicals Agency), Florian Schulze (IG Umwelt Zahnmedizin) and others.

Part E – Additional comments on the article in free text if the party chooses to do so

{Empty}

▼ ART. 18: PUBLIC INFORMATION, AWARENESS AND EDUCATION

18.1. Have measures been taken to promote and facilitate the provision to the public of the kinds of information listed in article 18, paragraph 1?

☒ Yes

☐ No

If yes, please indicate the measures that have been taken and the effectiveness of those measures

Education, training and public awareness activities related to the effects of exposure to mercury and mercury compounds on human health and the environment are diverse, often in cooperation with governmental and non-governmental organizations. The active institution in this field of activity is The National Center for Public Health and Analysis (NCPHA). Specifically with regard to mercury, consistent practice after 2017 is the inclusion in the courses for continuing education and acquisition of a specialty on the topic of mercury toxicity and the Minamata Convention. The Convention was ratified by a law adopted by the 43rd National Assembly on 2 September 2016 (SG. no. 71 of 2016, in force for the Republic of Bulgaria from August 16, 2017) and is publicly available.

On the other hand, the National System for the Separate Collection of Hazardous Household Waste enables households to separate and transfer mercury and devices containing mercury, such as thermometers, blood pressure monitors and mercury ampoules, to mobile points. These are the most recognizable hazardous waste in the home.. During the campaigns, leaflets are distributed by the mobile points describing which waste should not be disposed of in shared containers, promoting the signs on the packaging that indicate a risk to health and the environment.

Part E – Additional comments on the article in free text if the party chooses to do so

According to the Environmental Protection Act, the Minister of Environment and Water maintains a public register with data on the results of the issuance, refusal, revocation, review, amendment and updating of integrated permits.

Link: <http://registers.moew.government.bg/kr/>

The Executive Environment Agency maintains a public register on its website of the results of the monitoring of emissions provided for in the integrated permits.

Link: <http://eea.government.bg/bg/r-r/r-kpkz/godishni-dokladi-14/index>

Regulation № 166/2006 establishing a European Pollutant Release and Transfer Register (EPRTTR), adopted on 18 January 2006, requires operators carrying out activities falling within the scope of Annex I thereto to report annual releases and emissions of pollutants to the European Commission. Mercury and its compounds (expressed as Hg) are included in the list of pollutants reported under the EPRTTR. The Executive Environmental Agency (EEA) summarizes data from the EPRTTR and maintains a public register of releases and transfers of pollutants at national level, as well as access to it through the EEA website.

Link: http://pdbase.government.bg/forms/public_eprtr.jsp

▼ ART. 19: RESEARCH, DEVELOPMENT AND MONITORING

19.1. Has the party undertaken any research, development and monitoring in accordance with paragraph 1 of article 19?

☒ Yes

☐ No

If yes, please describe these actions

The country is conducting an inventory of the use of mercury and mercury compounds, as well as anthropogenic emissions into the air and releases to water and soil. The levels of mercury and mercury compounds in the environment are monitored.

The country maintains a public register on the website of the Executive Environment Agency on the results of the emission/releases monitoring provided for in the integrated permits.

Link: <http://eea.government.bg/bg/r-r/r-kpkz/godishni-dokladi-14/index>

Operators apply best available techniques and best environmental practices to reduce and monitor emissions and releases of mercury and mercury compounds.

The requirements for banning or restricting the trade in mercury and mercury compounds, as well as mercury-added products are subject to control. No violations have been identified by operators related to mercury concentration limits.

The National Center for Public Health and Analysis (NCPHA) has data from its own analytical studies to establish levels of mercury contamination in various environments essential to human health and the environment. Tests for mercury content in the analyzed samples cosmetic products, water, food and food additives, soils, sludges for use in agriculture, products made of polymeric materials, etc. are assigned to the NCPHA by legal entities and individuals and the results of specific tests are confidential information. In order to clarify the levels of mercury pollution in different environments, the results are summarized and systematized.

In general, the results obtained meet the requirements of European and national legislation on the concentration of mercury in the studied environments, which is why so far there is no need to conduct a specialized epidemiological study on mercury.

Part E – Additional comments on the article in free text if the party chooses to do so

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▼ COMMENTS

Part C: Comments regarding possible challenges in meeting the objectives of the Convention (Art. 21, para. 1)

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▼ SUPPLEMENTAL – ADDITIONAL COMMENTS

Supplemental: Part D: Comments regarding the reporting format and possible improvements, if any

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