

FIRST FULL NATIONAL REPORTS OF THE MINAMATA CONVENTION ON MERCURY 2021

* Questions 3.4, 5.1, 7.2 and Part C amended by Iran on 23 October 2022



REPORTING PERIOD:

16 August 2017 to 31 December 2020

▼ INFORMATION ON THE PARTY

1. Information on the party

Name of party

Iran (Islamic Republic of)

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

16 June 2017

Date of entry into force of the Convention for the party

14 September 2017

2. Information on the national focal point

Full name of the institution

Ministry of Foreign Affairs

Title of National Focal Point

Secretary of the National Authority for Chemicals Conventions

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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

a3_subsection

Full name of the institution

Ministry of Foreign Affairs

Title of contact officer

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▼ 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

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*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.

The only identified stock of the mercury in the country is the excess mercury of the decommissioned Bandar Imam Petrochemical Complex which will be explained further in next question (3.4).

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

If yes, please explain the measures taken to ensure that the excess mercury was disposed of in accordance with the guidelines for environmentally sound management referred to in paragraph 3 (a) of article 11 using operations that did not lead to recovery, recycling, reclamation, direct re-use or alternative uses.

1- The only identified stock is the excess mercury of the electrolysis cells and related equipment of decommissioned Chlor-alkali plant of the Bandar Imam Petrochemical Complex located on the northwest side of the Persian Gulf.

Excess mercury in electrolysis cells and related equipment is equal to 230096 kg, which is stored and kept in 13 tanks. The amount of unused mercury is 19837.5 kg, which is stored in 34.5 kg capsules.

2- Decommissioning of the excess mercury of the chlor-alkali plant of the Shiraz Petrochemical Complex, located on the south of Iran, carried out in 2009. All excess mercury in electrolysis cells in this plant, extracted, capsulated and delivered to the Bandar Imam Petrochemical Complex.

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

{Empty}

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

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▼ 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.

1– Ministry of Industry, trade and Mines has banned import of the mercury-vapor lamps.

2– There has been some activities by private sector to use alternatives for the mercury containing lamps including by the Association of Manufacturers of LED Products and certain other companies manufacturing lamps with solid mercury amalgam instead of gaseous mercury.

3– Ministry of Health has promoted production of digital manometers and thermometers. Production and import permission is not given for the mercury based manometers, sphygmomanometer and thermometers.

4– Ministry of health has prohibited import and production of the cosmetics with mercury content above 1ppm .

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.

Aiming to minimize the use of dental amalgam in the country, following measures has been taken since 2014:

1 – Restricting the use of amalgam capsules in dental clinics and other related health centers;
2 – Prohibition of production permission for manufactures of amalgam capsule (only 5 manufacturer of capsulated amalgam are active in the country);

– Prohibition of use of powder amalgam since 2017

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.

Yes. The mercury lamps are replacing with LED lamps.

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.

–To discourage manufacture of the mercury vapor lamps, loans have been provided to the manufactures of LED lamps.

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

If yes, please provide information on measures taken to address emissions and releases of mercury or mercury compounds from such facilities.

The color alkali plant of Abadan is located in south west of Iran, In this plant, several measures have been taken to minimize the pollution arising from emission and release of the mercury including:

- 1- Decontamination of the contaminated waste waters through a mercury cleaning system.
- 2- Quarterly sampling and analyzing of mercury contamination in the plant by the trusted laboratory of the Department of the Environment;
- 3- Delivering all mercury contaminated wastes of the plant to the companies who are eligible for environmentally sound management of those wastes.

The plant currently is facing with financial and technical challenges (importing the necessary equipment) to convert the mercury based cells to alternative mercury free technology.

If available, please provide information on the number and type of facilities and the estimated annual amount of mercury or mercury compounds used in those facilities.

{Empty}

Please provide information on how much mercury (in metric tons) is used in the processes listed in the two first entries of Part II of Annex B in the last year of the reporting period.

This plant consumes on average 7000 kg of mercury annually.

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)

If no to either of the questions above, has the party registered for an exemption pursuant to article 6?

- ☒ Yes
- ☐ No

If yes, for which process(es)?

☒ Chlor-alkali production

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

7.3. Has the party developed and implemented a national action plan and submitted it to the secretariat?

☐ Yes

☒ No

☐ In progress

7.4. Attach your most recent review that must be completed under paragraph 3 (c) of article 7, unless it is not yet due

{Empty}

7.5. Supplemental: Has the party cooperated with other countries or relevant intergovernmental organizations or other entities to achieve the objective of this article?

☐ Yes

☒ No

Please provide information

{Empty}

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

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▼ 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 power plants

1- Developing inventory of source categories is not yet completed in the country. Iran under its SIP-2 project of the Minamata convention is currently collecting the related information.

2- in the Clean Air law of Iran which contains provisions for the air pollution in the country, measurement of the mercury pollution has been included.

3- According to certain data, the related industries in Iran are facing with technical and financial challenges in procurement of the mercury emission equipment.

4- The national standards regulating pollutant emissions including mercury and its compounds from Waste incinerator facilities has been developed and adopted by Iran National Standardization Organization.

5- In accordance with the Soil Protection Law adopted by the Iranian Parliament in 2019, threshold limit value for different pollutants including mercury has been determined.

6- Department of Environment of Iran has developed "Iran Water Quality Index for Surface Water Resources-Conventional Parameters" in 2014. Different poisonous parameters including mercury which are likely to affect surface waters has been considered and determined in it.

☒ Coal-fired industrial boilers

Coal-fired industrial boilers

As explained for Coal-fired power plants.

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

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

As explained for Coal-fired power plants.

☒ Waste incineration facilities

Waste incineration facilities

As explained for Coal-fired power plants.

☒ Cement clinker production facilities

Cement clinker production facilities

As explained for Coal-fired power plants.

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

No clear information available. In this regard, developing an inventory under SIP-3 is being carried out.

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

{Empty}

Progress

{Empty}

▼ 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

{Empty}

Progress

{Empty}

▼ 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

{Empty}

Progress

{Empty}

▼ 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

{Empty}

Progress

{Empty}

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

Please explain

No clear information available. In this regard, developing an inventory under SIP-3 is being carried out.

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

If no such inventory exists, please explain

No clear information available. In this regard, developing an inventory under SIP-3 is being carried out.

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

No clear information available. For relevant sources also developing an inventory under SIP-3 is being carried out.

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 explain

No clear information available. Developing an inventory under SIP-2 project of Iran is being carried out.

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

Please explain

No clear information available. Developing an inventory under SIP-3 project of Iran is being carried out.

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

{Empty}

▼ 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.

The excess mercury of the electrolysis cells and related equipment of decommissioned Chlor-alkali plant of the Bandar Imam Petrochemical Complex located on the northwest side of the Persian Gulf which is equal to 230096 kg are stored and kept in 13 tanks and the amount of unused mercury is 19837.5 kg, which are stored in 34.5 kg capsules.

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

{Empty}

▼ 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.

The National Implementation Regulations on Environmentally Sound Management of Mercury Wastes has been ratified in March 2013 by the Hazardous Chemicals and Wastes Subcommittee affiliated to the National Sustainable Development Committee.

This National regulations has been developed taking into account the provisions of the National Waste Management Law, Basel Convention and the Minamata Convention on Mercury.

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

If yes, if the information is available, how much waste consisting of mercury or mercury compounds has been subjected to final disposal under the reporting period? Please specify the method of the final disposal operation/operations.

There is a landfill for disposal of the wastes including mercury wastes of the he Bandar Imam Petrochemical Complex located on the northwest side of the Persian Gulf.

The information and data on the disposed mercury wastes in this landfill is not available at the time of developing this national report and can be collected and compiled later.

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

{Empty}

▼ 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

A strategy has been developed by the Department of the Environment in which six measures has been defined for identifying and assessing sites contaminated by mercury or mercury compounds as following:

- 1- Developing an inventory of emission;
- 2- Designating the critical contaminated sites based on step 1;
- 3- Assessing the critical contaminated sites taking into account the scale, surface and depth of the contamination;
- 4- Evaluating the best method for decontamination of the contaminated site;
- 5- Testing in bench and pilot scale for final evaluation;
- 6- Decontaminating the contaminated site

The needed information has been requested from the related stakeholders in the country and it is in progress.

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

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▼ 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

1- In the SIP-1 and SIP-2 project of Iran under Minamata Convention there has been some in kind contribution for the implementation of those projects.

2- The Environment Department of Iran funded a joint project with University of Tehran titled " implementation of the Minamata Convention in Iran ". In this project following measures were carried out :

- Developing forms to identify and collect information on mercury – added products
- Developing forms to identify and collect information on manufacturing process in which mercury or mercury compounds are used
- Developing information for a toolkit (level 1) on emission and mercury release
- Identifying the gaps for collecting the needed information.

3- In kind contribution of the Department of Environment for organizing two workshops with participation and financial assistance of Japan:

- In 2015 an awareness raising workshop was held for introducing the Convention to the relevant national and provincial officials and experts
- in 2017 a workshop was held for introducing, UNEP's Toolkit for identification and quantification of mercury releases and emission to the relevant national and provincial officials and experts

5- Department of Environment funded crating an online platform (<https://iranemp.ir> with restricted access) for collecting, registering and evaluating the information provided through self declaration of

pollutant industries.

The basic information of the emissions and release of mercury and mercury compounds by the relevant industries also can be registered in this platform.

Please provide comments, if any.

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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

Due to imposing illegal sanctions on Iran and as a developing country in need of financial resources, The country has not been in a position to contribute to the financial mechanism of the Convention.

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

Due to imposing illegal sanctions on Iran and as a developing country in need of financial resources, The country has not been in a position to contribute to assist developing-country parties and/or parties with economies in transition in the implementation of the Convention .

Please provide comments, if any.

{Empty}

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

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▼ 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

Considering imposing the illegal sanctions on the country, scarce of resources and the fact that Iran is a developing country, it has not been possible to provide capacity building and technical assistance to another party.

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

☐ Yes

☒ No

Please specify

Iran has received 100,000 dollar financial assistance for its SIP-1 project titled : Implementation of the Minamata convention for mercury management in Abadan petrochemical company.

– Under SIP-2, Iran is currently implementing the project: "Capacity-building for effective implementation of Minamata Convention focusing on mercury inventory". The funding of this project is 150,000 dollar.

– Iran proposal under SIP-3 has been approved but its contract agreement is yet to be signed.

Please provide comments, if any.

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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

Despite illegal sanctions, tremendous financial and technical challenges; Iran has facilitated the environmentally sound alternative technologies in certain areas including: using LED instead of mercury containing lamps, promoting safer alternatives for dental amalgam, converting the mercury cells to membrane technology in chloralkali plant of Bandar Imam

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

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▼ 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

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

☐ Yes

☒ No

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

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▼ 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

{Empty}

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

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▼ 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

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

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▼ 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

In accordance with Article 19 (a) of the Convention and in SIP-2 project of Iran, developing an inventory of emission and release of mercury and mercury compounds implemented.

While this project still has not completed, certain initial information has been collected based on a toolkit from the relevant internal stakeholders.

Further, in line with Article 19 (f) of the Convention and in SIP-2 project of Iran, certain information on commerce and trade of mercury and mercury compounds have been collected.

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)

Below are certain challenges in meeting the objectives of the Convention in Iran:

1) Collecting the reliable and updated information and data from different stakeholders responsible for implementing the Convention;

2) Certain technologies in the industries and other sources related with mercury in the country are not new and due to economic challenges and illegal unilateral sanctions on Iran it is not possible to transfer, improve or modernize those technologies;

This is a great challenge in the face of developing an inventory and collecting reliable information and data from industries and other sources related with mercury;

3) Import of equipment's/instruments needed for determination of the heavy metals particularly for mercury is subject to illegal unilateral sanctions imposed on Iran. Therefore identifying even the low content of the mercury in scientific and precise values is not possible and measurable.

4) Relevant foreign companies who provide maintenance, technical services, products, equipment and spare parts for monitoring, measuring and controlling mercury pollutant don't cooperate and sell them to Iran. This is a big challenge for implementing the emission and release provision of the Convention.

5) There have been numerous scientific studies on the different aspects of mercury and its impact on health and environment in Iran. Most of those studies have been published in Persian and need to be translated to English. To this end, it is necessary to provide financial resources and overcome legal challenges.

▼ SUPPLEMENTAL – ADDITIONAL COMMENTS

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

Regarding question 3 on primary mercury mining, it seems this question has focused only on the primary mercury mining that are now in operation or were not in operation at the time of entry into force of the Convention for the party.

We are of the view that it is also appropriate to ask about the measures a Party has taken to prevent or minimize the adverse effects of its mercury primary mining on the public health and environment.

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