

# 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**

Montenegro

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

10 June 2019

**Date of entry into force of the Convention for the party**

8 September 2019

## 2. Information on the national focal point

**Full name of the institution**

Ministry for Ecology, Spatial Planning and Urbanism

**Title of National Focal Point**

Ms. Jelena Kovacevic

**Name of National Focal Point**

Jelena Kovačević

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{Empty}

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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.**

Montenegro is in the period 2016–2017. prepared by the Minamata Initial Assessment (MIA), through a project funded by the GEF, in order to provide facts about the situation in Montenegro in this area and then it was determined that there is no individual stocks of mercury or mercury compounds exceeding 50 metric tons and sources of mercury supply generating stocks exceeding 10 metric tons per year . The document is planned to be adopted by the Government by the end of this year and after that we will be able to deliver it.

**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

{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

## ba36\_subsection

If the party has not previously provided such copies, it is recommended that it do so.

- MNE\_3.6.pdf

Otherwise, please provide other suitable information showing that the relevant requirements of paragraph 8 of article 3 have been met.

{Empty}

Supplemental: Please provide information on the quantities and countries of origin.

{Empty}

If yes, or if the party relied on paragraph 7 of article 3, did the non-party provide certification that the mercury is not from sources identified under paragraph 3 or paragraph 5 (b) of article 3?

☒ Yes

☐ No

☐ The party has submitted its general notification of consent, applied paragraph 9 of article 3, and provided information on the quantities and countries of origin.

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

▼ 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.**

The Government of Montenegro adopted Decree on prohibited and permitted method of use, manufacture and placing on the market of chemicals that present unacceptable risk to human health and environment in which is defined that import, export and manufactures of biocides, pesticides and topical antiseptics to which mercury is added is prohibited from 31 December 2020; Import, export and manufacture of cosmetic products to which mercury is added is prohibited from 31 December 2020, in accordance with regulations governing cosmetics. Import, export and manufacture of switches and relays shall be prohibited, except bridges for accurate measuring of the capacity and losses and high-frequency PF switches and relays in monitoring and control instruments, where the maximum mercury content is 20mg per bridge, switch or relays, from 31 December 2020. All other issues from Annex A Part I (batteries, lamps...) is transposed in Rulebook on limit values for the presence of hazardous materials in electrical and electronic products ("OG of MNE", No. 067/18 ).

**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

**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

**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 no, has there been an assessment of the risks and benefits of the product that demonstrates environmental or health benefits? Has the party provided to the secretariat, as appropriate, information on any such product?**

☐ Yes

☒ No

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

{Empty}

▼ **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)

**If yes, please provide information on these measures.**

The Law on Industrial Emissions prohibits the use of mercury and mercury compounds and mercury mixtures in plants, ie appropriate production processes. The use of mercury and mercury compounds and mercury mixtures in production processes is allowed in the production of: sodium or potassium methylates and ethylates.

The conditions for the use and release of mercury and mercury compounds are prescribed by the Ministry.

The application of production processes in which mercury or mercury compounds are used is prohibited, if these processes were not applied before January 1, 2018, as well as the production and placing on the market of new products containing mercury.

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

☒ Yes

☐ No

☐ Not applicable (do not have these facilities)

**If yes, please provide information on these measures.**

The Law on Industrial Emissions prohibits the use of mercury and mercury compounds and mercury mixtures in plants, ie appropriate production processes. The use of mercury and mercury compounds and mercury mixtures in production processes is allowed in the production of: sodium or potassium methylates and ethylates.

The conditions for the use and release of mercury and mercury compounds are prescribed by the Ministry.

The application of production processes in which mercury or mercury compounds are used is prohibited, if these processes were not applied before January 1, 2018, as well as the production and placing on the market of new products containing mercury.

### **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)

**If yes, please provide information on these measures.**  
same comment as above

#### **SODIUM OR POTASSIUM METHYLATE OR ETHYLATE**

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

**If yes, please provide information on these measures.**  
same comment as above

#### **PRODUCTION OF POLYURETHANE USING MERCURY-CONTAINING CATALYSTS**

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

**If yes, please provide information on these measures.**  
same comment as above

**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**

{Empty}

**▼ 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**

in Montenegro there is no artisanal and small-scale gold mining and processing subject to article 7 in which mercury amalgamation is used.

**▼ 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

in Montenegro there are no new sources of mercury emissions for the categories of sources in Annex D. in accordance with national legislation all measures for protection of land, air, water and sea, for all installations, are prescribed for all plants, depending on the location, in accordance with the best available techniques, depending on technological processes.

### 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

in Montenegro is one thermal power plant in Pljevlja that uses coal and is subject to an integrated permit in accordance with the Law on Industrial Emissions. In March 2018, the Environmental Protection Agency issued an integrated permit for TPP Pljevlja I, according to



which it is envisaged that the plant must meet by 2023 2017 LCP BREF standards. The integrated permit defines all measures that the operator must implement. The permit is available on website <http://www.epa.org.me/images/Rjeenje-o-izdavanju-integrisane-dozvole.pdf>

### **Progress**

Operators submit annual reports to the Environmental Protection Agency on the implementation of measures from the integrated permit

#### **▼ 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**

For the existing plan the permit with measures are issued in 2018, and the operator submit annual reports to the Environmental Protection Agency on the implementation of measures from the integrated permit. Also, the project of ecological reconstruction of TPP Pljevlja is planned in the future.

**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**

{Empty}

**▼ 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 sources of releases defined in paragraph 2b of article 9 Minamata convention are identified in Minamata initial Assessment. The MIA is integral part of National plan for implementation of Minamata convention which is planned to be adopted by the Government by the end of this year, after which we will translate it and submit it to the Secretariat of the Convention.

**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**

{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

**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.**

In Montenegro, there is no infrastructure for the disposal of hazardous waste, with technical and technological solutions in accordance with European standards. In accordance with the Law on Waste Management (Official Gazette of Montenegro 64/11, 39/16) and the requirements of the Basel Convention on the Control of Trans-boundary Movements of Hazardous Waste and its Disposal, and pursuant to permits issued by the Environment Protection Agency (EPA), hazardous waste is exported from Montenegro.

**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**

{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**

Montenegro is in the period 2016–2017. prepared by the Minamata Initial Assessment (MIA), through a project funded by the GEF, in order to provide facts about the situation in Montenegro in this area and then it was determined that there is no sites contaminated by mercury or mercury compounds in Montenegro. The document is planned to be adopted by the Government by the end of this year and after that we will be able to deliver it.

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

{Empty}

▼ 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**

The project "Preparations for ratification and implementation of the Minamata of the Convention on Mercury – Initial Assessment for Montenegro", the Ministry implemented during 2016–20218 with the funds of GEF in cooperation with the United Nations Development Program (UNDP).

Montenegro participated in the capacity building program for the implementation of the Basel, Rotterdam, Stockholm and Minamata conventions within the UN Environment Program, project "Strengthening synergies between the Basel, Rotterdam, Stockholm and Minamata conventions" is approved, by the Secretariat of the Special Program.

**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**

Montenegro paid the planned contributions for 2019, while for 2020 we did not receive the same from Secretariat convection.

**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**

Montenegro is developing county party.

**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**

Montenegro is a developing country.

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

☒ Yes

☐ No

**Please specify**

Within the project Strengthening the Capacity to Accelerate the EU Negotiation Process, funded by the Norwegian Ministry of Foreign Affairs and implemented by UNDP in Montenegro in cooperation with the

Office for European Integration the workshop "ADEQUATE CONTROL OF IMPORTS OF PRODUCTS THAT COINTAINIG MERCURY" was organized in July 2019, and experts from Croatia was engaged.

**Please provide comments, if any.**

The project "Preparations for ratification and implementation of the Minamata of the Convention on Mercury – Initial Assessment for Montenegro", the Ministry implemented during 2016–20218 with the funds of GEF in cooperation with the United Nations Development Program (UNDP).

### **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**

Montenegro is a developing country.

### **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.**

on the Environmental Protection Agency site is published Guidelines on mercury in order to provide information on mercury to the public. The guideline is available on <https://epa.org.me/2017/12/17/prirucnik-o-zivi/>

### **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.**

The Institute of Public Health is a specialized health institution, whose activity is aimed at preserving and improving the health of all citizens. In performing its activities, the Institute contributes to the management of mercury by performing the following tasks: proposes and implements measures regarding the control of health safety of foodstuffs and objects of general use, hygienic safety of drinking water, surface and waste water; monitors, analyzes and evaluates the impact of environmental quality (air, soil and noise) on the health status of the population; supervises and controls harmful

biological agents (through disinfection, dissection and deratization) and chemical agents; collects and processes the prescribed health–statistical data and prepares and publishes the "Statistical Yearbook", bulletins and other publications related to the activities of the Institute.

## **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**

On Environmental Protection Agency website is available Guidelines on mercury, also Agency is national helpdesk in accordance REACH, CLP and BPR and dealing with the dissemination of information on legal measures in order to reduce or eliminated use, import mercury, as well on limit values on emission and releases of mercury. Furthermore, Montenegro need to conduct activities on epidemiological information, on safer alternatives as well on scientific, technical information on mercury and mercury compounds.

## **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**

Throught project "Preparations for ratification and implementation of the Minamata Convention on Mercury–Initial Assessment for Montenegro" we implemented some activities in order to inform public.

During 2017, in order to raise citizens' awareness of the possible harmful effects of chemicals on human health and the environment, the EPA prepared and printed the Mercury Manual. The mercury manual summarizes the properties of mercury, hazard classification, exposure routes, safety measures for mercury handling, disposal, leakage and waste management, as well as emergency procedures.

In order to raise public awareness of the possible harmful effects of chemicals on human health and



environmental education, an educational presentation was held at the primary and secondary school in Nikšić on the topic of Harmful effects of mercury on the environment and health.

## **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**

For gaseous mercury, measuring location on the north of Montenegro is monitored since October 2019, no limit values are prescribed but only control measures. Monitoring of this pollutant was established for the first time with the aim of monitoring the impact of emissions from TPP Pljevlja on air quality in suburban and rural areas, because the location of the measuring station meets meteorological and other criteria for detecting direct impact of emitted pollutants from TPP Pljevlja. Also, the content of mercury in shellfish (*Mytilus galloprovincialis*) is monitored, as well as the content of mercury in sediment and soil.

All informations is given in the Information on the state of the environment which is available on the website of the Agency <https://epa.org.me/informacije-o-stanju-zivotne-sredine/>

## **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)**

{Empty}

### **▼ SUPPLEMENTAL – ADDITIONAL COMMENTS**

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

no