

FIRST FULL NATIONAL REPORTS OF THE MINAMATA CONVENTION ON MERCURY 2021

* Questions 3.3, 11.2 and Part E of Articles 8 and 11 amended by Saint Kitts and Nevis on 16 December 2022



REPORTING PERIOD:

16 August 2017 to 31 December 2020

▼ INFORMATION ON THE PARTY

1. Information on the party

Name of party

Saint Kitts and Nevis

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

24 May 2017

Date of entry into force of the Convention for the party

22 August 2017

2. Information on the national focal point

Full name of the institution

Saint Kitts and Nevis Bureau of Standards

Title of National Focal Point

Mr.

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

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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

If the party answered No above, please explain.

Saint Kitts and Nevis do not practice mining, do not have chlor-alkali facilities, so there is no need for the government to partake in an effort to identify such stock or source.

There is federation of St. Kitts and Nevis Solid Waste Management Corporation is not practicing waste separation to it's entirety. Most garbage collected is taken to the landfill for separation. Because of lack of proper inventory the amount is not quantified. However, mercury added products listed in annex A associated with the federation per-capita is in small volumes

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

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 no, has the party registered for an exemption pursuant to article 6?

- ☐ Yes
- ☒ No

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.

–Assessed key national stakeholders, their roles in mercury management and institutional interest, and capacities.

=Conducting surveys and awareness programs

–Analysed the regulatory framework, identified gaps and assessed the regulatory reforms needed

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 yes, please provide information on the measures.

No legal actions were taken. However, This was done through awareness, discussions with users and also inviting relevant persons to sit on the National Working Group for Minamata.

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

– There is no import ban for mercury, however, there are restrictions in place regarding the import and sale of specific MAPs. – This would also be governed by the already cited section in the Pesticides and Toxic Chemicals Act Chapter 30:03. Section 4A (1) (d) of that Act prohibits the import, export and disposal, inter alia, of a “controlled chemical” without doing so in a prescribed manner. Amending the Act to take into consideration the provisions of this article should follow the usual legislative process.

▼ 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

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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

No new sources

- ☐ Coal-fired industrial boilers
- ☐ Smelting and roasting processes used in the production of non-ferrous metals
- ☒ Waste incineration facilities

Waste incineration facilities

No new sources

- ☐ 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

No new sources

Attach relevant documentation

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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

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Progress

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▼ 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

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Progress

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▼ 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

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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 new sources

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 new sources

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

For many years medical waste was accumulated and burnt in an oven constructed from brick outside. To address this problem, an autoclave was installed for medical waste at the Landfill in Saint Kitts through a GEF project, operated by the Solid Waste Management Corporation.

▼ **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

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

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▼ **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

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▼ ART. 11: MERCURY WASTES

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

☐ Yes

☒ No

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

No mercury waste in a quantity above the relevant thresholds.

Disposal of Dis-used Street Lamps – Street & Flood Light Retrofitting Project

We have reviewed shipping regulations such as the Basel Convention (Transshipment of Hazardous Waste) and the MARPOL Convention (Trans-shipment of Hazardous Waste). The MARPOL and the Basel Convention are mutually exclusive regimes that were taken into consideration primarily to pollution generated via the ship.

Handling and Disposal Protocols

Listed below is the appropriate hazardous waste handling, transportation and storage, and disposal protocols for removed luminaires (fixtures) and lamps (bulbs).

This includes the requirements for the disposal to an overseas facility that is certified to receive such waste.

Luminaire and Lamp Disposal activities can be generally segregated into two main stages:

After luminaires are removed and shipped to the designated storage area, the lamps shall be removed from the luminaires and stored in bins held in a secure and covered area to prevent lamp breakage. Once the lamp is removed the lamps shall be packaged and sent to an offshore recycling facility. Written documentation shall be required to support receipt of the material and that proper recycling has been undertaken.

The process for lamp disposal shall be as follows:

– Lamps shall be removed from the luminaires and packed in metal drums with padding to prevent lamp breakage.

– SKELEC (St. Kitts electricity company) and NEVLEC (Nevis electricity company)

The third being to separate the lamps shell, metal and arc tubes and ship the arc tubes intact for disposal. Further investigation indicated crushing the entire lamp is not a viable option. The issue is the liquid mercury contained within the arc tube of the lamp (see figure right). If this is crushed in a bulb crusher it will release the liquid mercury which may or may not be an issue for the worker. However, the shipment in the drums will now be categorized as "HAZARDOUS WASTE".

▼ 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

Federation does not have in its possession an instrument to conduct soil analyses at its landfills, which has the highest probability of being contaminated since all household waste is collected in bulk and taken there to be separated.

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) The government of the federation of St. Kitts and Nevis rolled out a Light Exchange and Distribution program in the houses of it's residents. This was a house to house replacing incandescent, fluorescent and compact fluorescent light (CFL) bulbs with light emitting diodes (LED) bulbs. More than 320,000 bulbs are expected to be exchanged over through the program. Mercury fillings has become a thing of the past in St. Kitts and Nevis.

Another project earmarks throughout the federation for a lighting upgrade with the installation of over 1,000 LED street lights, replacing those containing mercury.

Please provide comments, if any.

Despite the fact no legislations has been passed in relation to phase out or eliminate the use of dental amalgam, with extensive and effective awareness with the stakeholders and the public, a voluntary action was taken to wipe out the use of mercury for fillings with alternatives instead.

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

Federation of Saint Kitts and Nevis is considered as a SIDS, hence a country in transition to implement the convention.

Please provide comments, if any.

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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

Federation of Saint Kitts and Nevis is considered as a SIDS, hence a country in transition to implement the convention.

Please provide comments, if any.

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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

Federation of Saint Kitts and Nevis is considered as a SIDS, hence a country in transition to implement the convention.

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

☒ Yes

☐ No

Please specify

Basel Convention Regional Centre for Training and Technology Transfer for the Caribbean (BCRC-Caribbean) under the GEF Project:

–Development of the Minamata Initial Assessment.

–ISLANDS project

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

Federation of Saint Kitts and Nevis is considered as a SIDS, hence a country in transition to implement the convention.

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

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

Mercury fillings has become a thing of the past in St. Kitts and Nevis. Phasing out and eliminating the use of instruments containing mercury. Despite the fact no legislations has been passed in relation to phase out or eliminate the use of dental amalgam, with extensive and effective awareness with the relevant stakeholders such as dentist, hospitals and the public, a voluntary action was taken to wipe out the use of mercury for fillings with alternatives instead.

Visiting schools and other business places to conduct presentations on Minamata Convention

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

BCRC of Trinidad, has the implementing agency of the Caribbean Islands. All information garnered in each country is disseminated among the the other islands in the region, which is an ongoing process.

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

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

Despite the fact no legislations has been passed in relation to phase out or eliminate the use of dental amalgam, with extensive and effective awareness with the relevant stakeholders such as dentist, hospitals and the public, a voluntary action was taken to wipe out the use of mercury for fillings with alternatives instead.

Visiting schools and other business places to conduct presentations on Minamata Convention .

Building synergies with other departments and using their activities as an opportunity for information exchange.

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

Hair and fish samples were collected in a intra-regional study and were sent to BRI a lab in Canada for analyses and comparison of results.

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)

Saint Kitts and Nevis is categorized a SIDS, despite the funds distributed to implementing centers for assistance. As a country in transition to implement the convention, we find that is very competitive to gain access to the funds available under the SIP. Changing the culture of the public is one of our major challenges, finding economically feasible mercury alternatives, insufficient data and temporary storage is pertinent to make the implementation of the convention possible. We recognize it is ideal that we address those challenges first before imposing legislations/regulations, even though they are currently addressed by our legal department.

▼ SUPPLEMENTAL – ADDITIONAL COMMENTS

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

There are areas where the questions can be refined.