

Great Lakes Mercury Phase-Down Strategy: Perspectives of Several Nongovernmental Organizations



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NGO Input on Strategy

- Brief overview comments provided in person at Great Lakes Regional Collaboration meeting Oct. 2, 2007 in Chicago
- Multi-group written comments (with Alliance for the Great Lakes and others) provided during comment period



Positive Elements of Strategy

- Recognizing progress in various sectors to date, and building on them
- Recognition of importance of mandatory programs:
 - Amalgam separators for dental offices
 - Recycling of (non-residential) fluorescent lamps
 - Bans on sales of mercury-containing thermometers, thermostats
 - Ban on purchase, use, storage of mercury in schools

Limitations of Strategy

- Lack of clarity on how commitment to delivering on Strategy goals will be ensured
- Ambiguity on lead agencies on each action item
- Lack of prioritization of action items
- Limited information on how tracking, progress reporting, or accountability will be managed
- No emphasis on potential for more aggressive implementation of existing regulatory programs

Concerns on Implementation

- In spite of many laudable goals, proposal does not identify implementation plan or schedule, including clarifying to what extent the objectives will actually be achieved:
 - “The signatories do not commit to implementation of all of the recommendations, but rather commit to consider implementation of those recommendations that are appropriate and feasible in the individual circumstances of each state, tribe, or municipality.”

NGO Implementation Recommendations

- Strategy partners (states, tribes, municipalities) should review individual recommendations of initial focus and identify responsible party
- Individuals identified (or group) should develop implementation plan, with timeline, and integrated in single implementation document
- Responsible parties should make effort to prioritize efforts for implementation (potentially using available tools such as substance flow models)
- Should have increased emphasis on more effective implementation of existing mandatory programs (e.g., more aggressive mercury permitting strategies/less use of variances, more aggressive pollutant minimization plans at wastewater treatment plants (WWTP))
- Partners should consider prioritizing WWTP efforts on areas with combined or sanitary sewer overflows.
- Strategy should emphasize importance of aggressive international efforts to reduce mercury use globally

