

**EuSalt position on the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on mercury (2016/0023), and repealing Regulation (EC) No 1102/2008**

Brussels, 14<sup>th</sup> June 2016

**1. The European salt industry favours only the safest solution for Mercury storage in salt mines.**

The European salt industry wishes to encourage policy-makers to prioritise the safest solution to store mercury. As an industry, our core activity remains salt extraction (NaCl) which is used for many applications, amongst which food grade salt and salt for pharmaceutical applications. In this context the long term storage requirements need to respond to the highest safety conditions not only securing the environmental protection, but also assuring the safety and purity criteria imposed by salt different applications.

**2. EuSalt is supportive of storing stabilised mercury waste in salt mines as a long-standing and reliable option**

The European salt industry has been committing to the permanent storage of stabilised mercury waste in a stabilised form in salt mines for many years. It is rightfully mentioned in the EU proposal as a safe and trustable solution. It can only be achieved in the limit of the salt mine storage conditions, fulfilling the safety rules- and provided it respects the local competent authorities' approval conditions.

**Recommendation**

Storage of stabilized mercury in deep salt mines is considered a safe option for the disposal of mercury by hazardous waste experts and established storage company operators. This solution also reduces the risk of accidental environmental exposure whilst being stored in an appointed area.

An investigation into the safety of permanent storage of liquid mercury is ongoing in Germany, but these studies may still take several years before being finalised.

In conclusion, the salt industry insists on the scientific progress necessary in this situation before any commitment is made to store metallic mercury in salt mines. EuSalt deems it essential in order to represents the interests of its members and being a trustable partner in handling the safe disposal of mercury waste in salt mines, to opt for the stabilization of mercury as the only option for safe permanent storage in salt mines.

## **Background**

The Commission adopted on 2 February 2016 a ratification package that will allow the EU to ratify the Minamata Convention on mercury once the legislative process is concluded. The package consists of a Regulation on mercury repealing and replacing Regulation (EC)1102/2008. The draft Regulation will maintain its provisions to regulate waste mercury disposal.

### **1. The European salt industry favours the safest solution**

Beside its essential function to extract salt, salt mines serve also many other functions among which storage of hazardous waste is a possibility deployed by some companies. Thanks to a long experience and the application of the highest safety standards, these companies have been contributing to safe underground waste storage in salt mines for many decades.

The safety of long-term underground storage is guaranteed by existing EU waste legislation (Directive 1999/31/EC and Decision 2003/33/EC) which ensures only storage sites with the necessary permits for the storage of hazardous waste can be used. Depending on the specific local authority authorization and exploration conditions, some of the salt mines have explored and are engaged in the storage of mercury in a stabilized form.

Following the EU adoption of the Minamata Convention to progress on this environmental issue, EuSalt welcomes the European Commission efforts to further protect human health and the environment from mercury waste emissions and mercury waste compounds to air, water and land. EuSalt position is to stay committed to the highest safety standards for human health and environmental protection.

Storing mercury is a secondary activity that cannot undermine the central aspect of EuSalt members' activity which is the production of salt from extraction.

Salt extraction is the core activity of EuSalt members and as such their main priority. Salt extracted including from salt mines is a central raw material for the chemical industry, de-icing, food and feed end-uses.

This means that prior to any decision, salt mines must ensure the safety of their workers extracting salt underground, of the environment as well as of nearby communities. That is why when stored in salt mines, mercury is stabilised and in low concentration waste.

### **2. EuSalt is supportive of storing stabilised mercury waste in salt mines as a long-standing and reliable option**

Stabilised mercury waste has been stored in salt mines for many decades and is rightfully mentioned in the EU proposal as a safe and trustable solution. The European salt industry can keep on committing to the storage of mercury waste in a stabilised form in salt mines for now.

EuSalt would like to take this opportunity to reiterate the fact that this can only be achieved in the limit of the mine capacity, and in a low concentration - so that the salt industry safety rules are respected - and provided local competent authorities approve it.

This is the reason why the salt industry has no interest, for now, in storing other forms of mercury than stabilised. We do understand the industrial needs for permanent disposal solutions, and we welcome positions for other permanent disposal solutions, including stabilized mercury.

We would also like to add another potential solution to store mercury, making the difference between salt mine still in use and the ones that are not. The latest could provide for an additional stocking space the salt sector can offer.

### **3. Key aspects of the salt industry**

EuSalt represents the interests of European salt producers. With an estimated production of **60 million** tonnes of salt (NaCl), European producers represent the third biggest salt production worldwide. Salt is used as a raw material for many applications, and 60% is processed in the chlor-alkali industry. EuSalt wishes to be a responsible partner in this challenge and will keep on supporting Europe in implementing the Minamata Convention in a sustainable, responsible and safe manner.