

Mercury Risk Management

POSITION STATEMENT

February 2009

All ICMM member companies commit to implement and measure their performance against a set of 10 sustainable development principles. Where members have sought greater clarity on some of the key challenges facing the industry, ICMM has developed supporting position statements.

OVERVIEW

ICMM recognizes the importance of responsible management of mercury. ICMM members are not primary producers of mercury nor do they use it in the processing of ores. However, mercury is a naturally occurring element which is sometimes present in the ore that ICMM members process. As a result, pollution controls at some ICMM member companies' operations may collect mercury as a by-product.

Mercury is a global pollutant and there are legitimate calls within the industry and from external stakeholders to manage it effectively. ICMM members are committed to control mercury emissions to the environment. In addition to recognizing the potential impacts of mercury once it is released into the environment, ICMM fully recognizes the potential risks associated with by-product mercury and endorses the need for its effective management.

Mercury is used widely and sometimes illegally by artisanal miners to assist with the extraction of gold. This use is almost entirely uncontrolled with direct emissions to the environment. Consistent with ICMM's materials and environmental stewardship commitments, ICMM seeks to promote the responsible management of mercury by-product down the value chain in light of the potential environmental and human health impacts of a failure to responsibly manage such mercury.

BACKGROUND ON ICMM PRINCIPLES AND POSITION STATEMENTS

All ICMM member companies are required to implement the ICMM Sustainable Development Framework. This includes commitments to implement 10 principles throughout their businesses, to report in line with the Global Reporting Initiative's (GRI's) Sustainability Reporting Guidelines and Mining and Metals Sector Supplement, and to obtain independent external assurance that the ICMM commitments are being met (this framework is described in detail at www.icmm.com).

The ICMM principles of particular relevance to chemicals management are:

- **Principle 4:** Implement risk management strategies based on valid data and sound science
- **Principle 6:** Seek continual improvement of our environmental performance
- **Principle 8:** Facilitate and encourage responsible product design, use, re-use, recycling and disposal of our products.

In accordance with the ICMM principles, ICMM has also developed a number of position statements which further elaborate member commitments to particular issues. Company members are obliged to comply with these statements by incorporating them into their operational practices.

This position statement sets out ICMM members' approach to sound management of mercury related to their operations. While recognizing that some ICMM members' operations do contribute mercury releases to the environment, albeit only a minor incremental addition to the global load, ICMM members have agreed to the following position.

RECOGNITION STATEMENTS

ICMM members recognize:

- 1 mercury is a metal that is transported globally in the atmosphere and has potential adverse human health and ecological effects
- 2 although the scientific understanding of mercury is still evolving, enough is known and understood to warrant taking action to reduce mercury releases to the environment
- 3 no ICMM member company owns or operates primary mercury production facilities; however, there are aspects within some operations that contribute to the global mercury load through air emissions, supply to the global market of elemental mercury or mercury compounds recovered as a result of pollution control, naturally occurring mercury compounds in some products (e.g. minerals and concentrates), and recycling of mercury-bearing products (e.g. lamps and switches)
- 4 significant progress has already been made in reducing mercury air emissions at ICMM members' operations and by users of those products
- 5 mercury recovered from our environmental management activities is a preferred source of mercury over other sources (e.g. primary mercury mining) for use in applications that are necessary and important for sustainable development – particularly for economic development and improving social welfare in developing countries
- 6 at such time when policy and economically viable long-term technological solutions for the retirement of mercury exist, the mercury supply from ICMM members' operations can be integrated into a strategy of gradual reduction and elimination
- 7 studies show that the informal sector of artisanal and small-scale gold mining (ASM) is a relatively large global consumer of elemental mercury and may be the source of significant mercury released to the environment every year
- 8 within the socio-economic and political complexities of the ASM issue there are opportunities to contribute to more sustainable livelihoods in this sector through the transfer of technology that improves productivity and reduces reliance on mercury
- 9 mercury is an issue that requires action at a global level and the importance of responsibly managing mercury in collaboration with key stakeholders.

COMMITMENTS

In addition to existing commitments under the ICMM Sustainable Development Framework and the Strategic Approach to International Chemicals Management (SAICM), ICMM company members will:

- 1 not open any mines designed to produce mercury as the primary product
- 2 apply materials stewardship to promote the responsible management of the mercury produced from ICMM members' operations including that which naturally occurs in our products
- 3 identify and quantify point source mercury air emissions from our operations and minimize them through the application of cost effective best available technology, using a risk based approach
- 4 report significant point source mercury air emissions from our operations consistent with our commitment to report in accordance with the GRI framework
- 5 participate in government-led partnerships to transfer low- to no-mercury technologies into the ASM sector in locations where ICMM member companies have operations in close proximity to ASM activity such that livelihoods are enhanced through increased productivity and reduced impacts to human health.
- 6 through ICMM, encourage the development of sound science on the fate and transport of mercury as well as natural sources of mercury in the environment
- 7 work on an integrated multi-stakeholder strategy through ICMM to reduce and eventually cease supplying mercury into the global market once policy and economically viable long-term technological solutions for the retirement of mercury are developed.

ICMM

The International Council on Mining and Metals (ICMM) was established in 2001 to improve sustainable development performance in the mining and metals industry. Today, it brings together 21 mining and metals companies as well as 32 national and regional mining associations and global commodity associations. Our vision is one of leading companies working together and with others to strengthen the contribution of mining, minerals and metals to sustainable development.

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