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Extraordinary Meeting of the Contracting Parties
to the Convention for the Protection of the
Mediterranean Sea against Pollution and its
Related Protocols.

Athens, 10 - 13 April 1984

COMMENTS RECEIVED FROM THE CONTRACTING PARTIES
ON THE ASSESSMENT DOCUMENTS

(WG.91/5 and WG.91/6)

Comments received from MED POL National Co-ordinators on documents:

- UNEP/WG.91/5: Assessment of the present state of pollution by Mercury in the Mediterranean Sea and proposed control measures
- UNEP/WG.91/6: Assessment of the present state of microbial pollution in the Mediterranean Sea and proposed control measures

(Note by the secretariat)

The Second Meeting of the Working Group for Scientific and Technical Co-operation for MED POL (Athens, 21-15 November 1983) agreed that, "while taking note of the conclusions and recommendations of the documents and in addition to the preliminary comments made at the current meeting, the MED POL National Co-ordinators would provide the secretariat with their comments, in particular with regard to conclusions and recommendations by 15 January 1984. All comments received by that date would be analysed by the secretariat, in co-operation with FAO and WHO, and would be used in preparing the final documents, which would be submitted to the next meeting of the Contracting Parties." (paragraph 30 of UNEP/WG.91/12).

The comments received from the meeting are transcribed in annex I. Those received after the meeting, are reproduced (in chronological order), in annex II.

The secretariat, in co-operation with FAO and WHO, analysed these comments, and as they did not support substantive changes in the conclusions and recommendations contained in documents UNEP/WG.91/5 and UNEP/WG.91/6, the secretariat concluded that they could be used in their original form as information documents for the meeting of the Contracting Parties. The intention of the secretariat is to revise these documents, taking into account all comments received and issue their revised versions during 1984.

ANNEX I

Extract from the report of the Second Meeting of the Working Group
for Scientific and Technical Co-operation for MED POL
(Athens, 21-25 November 1983)

Agenda items 8 and 9: Assessment of the present state of pollution by mercury
in the Mediterranean Sea and proposed control measures;
Assessment of the present state of microbial pollution
in the Mediterranean Sea and proposed control measures

29. When introducing these agenda items, the secretariat recalled that the first versions of documents UNEP/WG.91/5 and UNEP/WG.91/6, and of the relevant reference methods for marine pollution studies, had been submitted to the First Meeting of the Working Group for Scientific and Technical Co-operation (Athens, 28 September - 2 October 1981). As that meeting had considered that it had no time to review the documents, it had requested the secretariat to prepare updated versions for consideration by the Contracting Parties. During 1982 and 1983, the secretariat had contacted the MED POL National Co-ordinators seeking comments and additional information relevant to the updating of the documents. On the basis of replies received, as well as additional information made available through MED POL and other sources, the secretariat had prepared documents UNEP/WG.91/5 in co-operation with FAO and WHO, and UNEP/WG.91/6 in co-operation with WHO, which were submitted to the meeting for comments, with a view to their transmission by UNEP to the next meeting of the Contracting Parties (Athens, April 1984).

30. In the ensuing discussion some participants pointed out that the french version of the documents was not available prior to the meeting and expressed the view that the meeting would not have time to provide the secretariat with a thorough analysis of the documents and that their review should therefore be postponed. The secretariat maintained that the documents represented the most substantive outputs so far produced by MED POL and that, in view of their relevance to the entry into force of the Land-based Sources Protocol, its mandate required that their main conclusions and recommendations should be brought to the attention of the Contracting Parties. In order to enable the secretariat to present those conclusions and recommendations to the Contracting Parties and to reflect the comments of the Working Group for Scientific and Technical Co-operation, it was agreed that, while taking note of the conclusions and recommendations of the documents and in addition to the preliminary comments made at the current meeting, the MED POL National Co-ordinators would provide the secretariat with their comments, in particular with regard to conclusions and recommendations by 15 January 1984. All comments received by that date would be analysed by the secretariat, in co-operation with FAO and WHO, and would be used in preparing the final

documents, which would be submitted to the next meeting of the Contracting Parties. The Working Group recommended that the section of document UNEP/WG.91/5 dealing with analyses and evaluation of the problems treated therein to be reviewed by the workshop referred to in para. 2.h. of annex V (activity 'K').

31. General comments, relevant to both documents, made at the meeting were:

- The terminology used should be verified and harmonized; and
- A glossary of technical terms with explanations might help the reader;

32. The Working Group recommended the following changes to be made in document UNEP/WG.91/5 (Assessment of the present state of pollution by mercury in the Mediterranean Sea and proposed control measures):

- The reference method mentioned in para. 113(b) should be recommended not for adoption, but for use without excluding other methods which give comparable results;
- Para. 113(c) should read "Include in their national monitoring programmes, whenever local environmental conditions so require, seafood species known to accumulate mercury, in addition to those agreed upon in the framework of MED POL - PHASE II.";
- Para. 113(d) should read "Limit the anthropogenic discharges Article 5 of that Protocol, and give priority to the elaboration of the necessary programmes and measures with respect to mercury.";
- Para. 113(f) should read "Reinforce the monitoring and research etc."; and
- Add to para. 113(f) "- research on the significance of selenium in the context of pollution by mercury."

33. Specific comments made at this meeting on document UNEP/WG.91/6 (Assessment of the present state of microbial pollution in the Mediterranean Sea and proposed control measures) were:

- The values proposed in para. 175 concerning seafood consumer protection should not prejudice the ongoing work carried out by EEC in accordance with EEC Directive 79/923;
- The reference methods mentioned in para. 181(b) should be recommended not for adoption, but for use; alternative methods, provided they yielded results comparable with those recommended as reference methods, should be also considered for routine use;
- Further studies on the intercomparability of various analytical techniques for the main microbiological indicators, recommended in para. 181(e), should receive low priority; and
- The programme of epidemiological studies, recommended in para. 181(e), should be specifically oriented towards the better understanding of the significance and implications of the proposed environment quality criteria.

ANNEX II

Comments received from MED POL National Co-ordinators after
the Second Meeting of the Working Group for Technical Co-operation
Athens 21-25 November 1983

A. Telex to Mr. A. Manos from Mr. Y. Cohen, MED POL National Co-ordinator,
Israel (original in English, received on 9 January 1984):

"Re: Yr letter of 2 December 1983

This is to inform you that we have no comments regarding the conclusions
and recommendations of documents UNEP/WG.91/5, UNEP/WG.91/6 and UNEP/WG.91/7
(including Add.1) as ammended by the Second Meeting of the WGSTC."

B. Letter to Mr. A. Manos from Mr. A. Demetropoulos, MED POL National
Co-ordinator, Cyprus (original in English, received on 12 January 1984):

"I refer to your letter of the 2nd December under Ref. AM/cor and I wish to
inform you that I have no comments to make on the three documents referred to
in your letter apart from those already made and reflected in the report of
the 2nd Meeting of the Working Group of Scientific and Technical Co-operation
for Med-Pol".

C. Letter to Mr. A. Cruzado from Mr. L. Jeftic, MED POL National Co-ordinator,
Yugoslavia (original in English, received on 18 January 1984):

"Referring to your letter from 2 December 1983, and conformably to agreement
at the Second Meeting of the Working Group for Scientific and Technical
Co-operation, we are sending you our additional comments on quoted documents.

We have not any remarks on document UNEP/WG.91/5, but correction should be
done on page 33 (Table 10). In Yugoslavia there is standard in force for
maximum permissible mercury concentrations - 0,5 ppm.

On document UNEP/WG.91/6 we also have not additional comments, except the
data given for Yugoslavia in Table 12 on page 21. Correct data successively
in comparison to Table 12 are as follows;

Yugoslavia	1978	Total coliforms	MPN 24	24 p.a.	100%	500
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D. Letter to Mr. A. Manos from Mr. J. Vaccarezza, MED POL National Co-ordinator, European Economic Community (original in French, received on 20 January 1984) :

"Following the decision taken during the Second Meeting of the Working Group for Scientific and Technical Co-operation (Athens, 21 - 25 November 1983), I am enclosing documents UNEP/WG.91/5 and 91/6 containing comments marked in red.

1.- I would like to bring to your attention the fact that I have made the minimum number of comments in order to avoid a new drafting. The remarks concern exclusively points of clarification in the texts or in the proposed criteria with some scientific additions.

Indeed, generally speaking, these two documents reflect the current state of knowledge on the subjects, on the basis of work carried out in those areas. However, it would be advisable to give the references ad hoc in the different chapters, rather than giving them all at the end of each document.

2.- More specifically, as far as the documents are concerned, the remarks are as follows :

2.1- Assessment of pollution by mercury (doc. UNEP/WG.91/5) :

Within the framework of national provisions and of relevant international agreements, chapter 90 should be amended as follows:

"The European Community adopted in March 1982 a directive on the limit values and quality objectives for mercury discharge by the chlor-alkali electrolysis industry (82/176/EEC).

This directive, adopted in application of directive 76/464/EEC on pollution by certain dangerous substances discharged into the marine environment, sets limit values, time-limits for compliance with these values and a procedure for monitoring and control of mercury discharge from this industry, as well as quality objectives for the marine environment into which mercury is discharged.

The goal of these quality objectives should be to eliminate pollution by mercury in the different parts of the marine environment which could be affected by such discharged.

These quality objectives set expressly to meet that goal are not meant to establish rules concerning the protection of consumers or the marketing of products coming from the marine environment".

The quality objectives specified in Annex II of this directive
..... (text unchanged).

- As concerned chapter 78 and taking into consideration the results of chapters 29, 31, 33, 35, 37, 38, I suggest to you the following text :

"Taking into account the results mentioned in the previous chapters, results which are not always comparable, it cannot be concluded at the present stage that mercury levels in Mediterranean open waters and deep-sea sediments are significantly higher than those in open ocean (Atlantic)". The same applies

- Taking into consideration chapters 93, 94, 99, 101, 104, 105, 106, the fourth line of chapter 109 could read" and in accordance with the results mentioned in the previous chapters", the following

2.2- Assessment of microbial pollution :
(Doc. UNEP/WG.91/6)

The end of chapter 48 should be amended as follows :

..... of recreational waters in the Mediterranean according to "the provisions of the Community directive on the quality of bathing waters (76/106/EEC) which takes into consideration imperative limits (I) and guide limits (G) for microbiological and physico-chemical parameters. It also indicates minimal sampling frequency and the methods of analysis and of parameter examination.

Taking into account chapter 5 of this directive (see chapter 92 and table 13) we could infer

Values I

and

Values G

- Specific remarks on the implementation of Community Directives have been marked in the document itself, especially in chapters 62, 68, 70, 72 and the relevant tables.

2.3- Report on the implementation of the Protocol for the prevention of pollution by petroleum hydrocarbons and other harmful substances (doc. UNEP/WG.91/7) :

Annex V page 6 amended as follows :

Monsieur le Directeur Général
Direction Générale : Environnement, protection des consommateurs
et sécurité nucléaire

Télex : 21 877 COMEU B

Téléphone : 02/235.11.11 (operator) ou
02/235.59.90

In conclusion, I would like to bring to your attention, dear Mr. Manos, the fact that I am at your disposal for any assistance which you may require in putting together the comments and suggestions by the Contracting Parties.

Yours sincerely"

Note by the secretariat:

Documents UNEP/WG.91/5 and UNEP/WG.91/6 attached to Mr. J. Vaccarezza's letter contained numerous comments and suggestions for the improvement of their quality. None of these comments or suggestions were of a substantive nature which could change the conclusions or the recommendations in the documents.