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To UNEP Civil Society <Civil.Society@unep.org>

cc Daniel Magraw <dmagraw@ciel.org>

Subj Re: PRIORITY: DOCUMENTATION FOR THE
ect SUBCOMMITTEE MEETING TO BE HELD ON 15
JANUARY 2008 (ADVANCE COPY OF DOCUMENT
UNEP/GCSS/X/9)

To: The Major Groups and Stakeholders Branch
United Nations Environment Programme (UNEP)

<>From: Glenn Wiser, Senior Attorney

Daniel Magraw, President
Center for International Environmental Law (CIEL)

Date: 11 January 2008 <>

Dear Major Groups and Stakeholders Branch:

Thank you for providing the opportunity for comment upon the advance copy of “Background paper for the ministerial-level consultations, including policy options emanating from the President’s Summary of the Ministerial Consultations of GC-24/GMEF” (“Background Paper”), UNEP/GCSS/X/9.

We have one very short suggestion about identifying potential synergies between carbon capture and sequestration (CCS) technologies and the mitigation of atmospheric emissions of mercury, which is a priority of the Governing Council (see Decision GC 24/3, Part VI, Paragraph 19(a)). We believe that taking advantage of these synergies will not only support another Governing Council priority, but will also help ensure that climate change mitigation efforts will contribute more generally to achieving sustainable development.

Pages 3 and 9 of the Background Paper discuss CCS in the context of suggested policies to promote investment in climate change mitigation and low-carbon investment trends. CCS also has significant potential to address mercury emissions from coal-fired power plants, which represent one of the largest and fastest-growing sources of global mercury pollution. As stated in the 2007 UNEP “Study on options for global control of mercury,” UNEP(DTIE)/Hg/OEWG.1/2:

Carbon capture and sequestration (CCS) potentially promises beneficial synergies between greenhouse gas and mercury reduction strategies. CCS is an interim or possibly long-term approach to mitigating climate change by capturing carbon dioxide from large point sources such as power plants and subsequently storing it, instead of releasing it into the atmosphere. Parties to the UNFCCC have asked

the Global Environment Facility to consider whether carbon capture and storage would be consistent with GEF strategies and objectives. Proponents of one of these technologies, integrated coal gasification combined cycle (IGCC), argue that IGCC power plants are inherently cleaner than traditional coal-fired plants, can capture carbon dioxide, and can eliminate nearly all of the plant's atmospheric mercury emissions (citations omitted).

CIEL notes that the Background Paper in numerous places identifies potential co-benefits and synergies between different environmental and development objectives. This is appropriate and desirable, especially in light of UNEP's goal of improving coherence and coordination in international environmental policy-making.

We suggest that the Governing Council's efforts to address the global challenges posed by mercury could be furthered if the Background Paper briefly references the potential synergy between greenhouse gas and mercury reduction strategies, in respect to CCS. This could be accomplished with an additional sentence at the end of paragraph 36 ("Carbon Capture and Storage moves through early stages of development and demonstration"):

In addition to achieving CO₂ emissions reduction, CCS could potentially play an important role in addressing other environmental issues recognized by the Governing Council, particularly the global challenges posed by atmospheric emissions of mercury.

Thank you very much for your consideration.

Sincerely,

<>Glenn Wiser, Senior Attorney

Daniel Magraw, President
Center for International Environmental Law