

ARTICLE 8 INTERVENTION

We support the elements of option 1 which provide for COP review and approval, require parties to make meaningful demonstrations to the COP that an exemption is appropriate, limit the exemption duration to a reasonable period of time, and provide the COP with authority to end the availability of exemptions when non-mercury alternatives are globally available.

In our view, option 2 is too open-ended, resulting in exemptions too easily obtained for too long a period of time.