



File: BAFU-061.6-04.34-05-2/1

Submission by Switzerland of available information on the supply, use and trade of mercury compounds, and views and input on mercury compounds which could be listed in a possible annex, pursuant to paragraph 13 of Article 3.

(1) Available information on the supply, use and trade of mercury compounds

The handling of mercury is regulated in Switzerland by [annex 1.7 of the Chemical Risk Reduction Ordinance, ORRChem \(SR 814.81\)](#). The import into Switzerland of any mercury compounds not already prohibited from placing on the market¹ requires an import licence issued by the Federal Office for the Environment (Annex 1.7, number 1.4.1, paragraph 1, letter c ORRChem). Such an import licence is not granted if the substance is intended for re-export, whether in a chemically altered or unaltered form (Annex 1.7, number 1.4.3, letter b ORRChem). This authorization is also not granted if mercury compounds are intended for use as auxiliary substances in industrial manufacturing processes, or if they are intended for products, preparations, and objects containing mercury compounds that are prohibited from being placed on the market (Annex 1.7, number 1.4.3, letter a ORRChem). Mercury compounds intended for analysis and research purposes are exempt from the import licence requirements. While the export of mercury compounds is not regulated, the most recent Swiss trade data available (January 2025 to January 2026) indicate that only mercury compounds for analytical and research purposes were imported or exported (total imports/exports of approximately 500 kg).

(2) Views and input on mercury compounds which could be listed in a possible annex pursuant to paragraph 13 of Article 3

Switzerland welcomes the information made available in the study on the supply, use, and trade of mercury compounds (UNEP/MC/COP.6/5/Add.1). Switzerland recognizes the need for and supports efforts to examine whether and which mercury compounds should be subject to paragraphs 6 and 8 of Article 3 of the Convention through the adoption of an additional annex. In our view, mercury compounds to be listed in this supplementary annex should be compounds from which elemental mercury can be easily recovered, such as mercury (I and II) chloride, mercury (II) sulfate, mercury (II) nitrate, mercury (II) oxide, mercury (II) sulfide, mercury (II) iodide, mercury (II) acetate, and cinnabar (mercury (II) sulfide and mercury (II) ammonium chloride). It may also be advisable to complement this list by including additional mercury compounds that could be present in certain products covered under Annex A of the Convention, such as cosmetics, pesticides, biocides, and topical antiseptics.

Moreover, within the open-ended expert group mandated to consider the information in the report, it would be beneficial to examine what possible options exist to mitigate the risk that, once certain mercury compounds are listed in a supplementary annex, alternative mercury compounds could be introduced to circumvent the Convention's trade requirements. In this regard, several regulatory options could be assessed in relation to paragraphs 6 and 8 of Article 3:

- I. a positive list, whereby only the listed mercury compounds are subject to the provisions;
- II. a negative list, whereby only the listed compounds are exempt from the provisions;

¹ Placing on the market of the following mercury compounds and of preparations that contain these mercury compounds is prohibited if their mercury content is 0.01% or more by mass: a. phenylmercury acetate (CAS no. 62-38-4); b. phenylmercury propionate (CAS no. 103-27-5); c. phenylmercury 2-ethylhexanoate (CAS no. 13302-00-6); d. phenylmercury octanoate (CAS No. 13864-38-5); e. phenylmercury neodecanoate (CAS No. 26545-49-3); f. mercury compounds other than those specified in letters a–e, provided that they are intended for the manufacture of polyurethanes.



III. a comprehensive approach, whereby all mercury compounds are subject to the provisions.

To support such an assessment, it would be helpful for major exporting and importing countries of mercury compounds (as reflected in Table 2 of document UNEP/MC/COP.6/INF/5) to provide relevant data to the open-ended expert group, including the number of annual imports and exports, the identity of the mercury compounds and the quantities involved.