

**Information on the supply, use, and trade of mercury compounds in Thailand,
for submission to the Secretariat of the Minamata Convention on Mercury.**

Laws and regulations governing mercury and mercury compounds in Thailand.

Thailand has enacted several laws to regulate the use of mercury, as mercury is utilized in a wide range of products. In particular, regulatory control is exercised under the Hazardous Substances Act, B.E. 2535 (1992), as amended, which serves as the principal legislation governing the production, import, export, and possession of hazardous substances. The production, import, export, and possession of mercury and mercury compounds are regulated as follows:

1. The Department of Industrial Works restricts the use of mercury and mercury compounds by classifying them as Type 3 hazardous substances under its responsibility. Accordingly, “the production, import, export, or possession of mercury and mercury compounds for industrial use requires prior authorization (subject to verification with the Department of Industrial Works).

2. The Food and Drug Administration regulates mercury compounds by prohibiting their use in household and public health applications. Such mercury compounds are classified as Type 4 hazardous substances under the responsibility of the Food and Drug Administration. Accordingly, “the production, import, export, transit, and possession of mercury compounds for use in household or public health applications are prohibited,” subject to the conditions prescribed in the relevant notifications (subject to verification with the Food and Drug Administration).

3. The Department of Agriculture regulates mercury compounds by prohibiting their use in agricultural applications. Such mercury compounds are classified as Type 4 hazardous substances under the responsibility of the Department of Agriculture. Accordingly, “the production, import, export, or possession of mercury compounds for agricultural use is prohibited” (subject to verification with the Department of Agriculture).

Regulation of the export of mercury and mercury compounds in Thailand.

Thailand, as a Party to the Minamata Convention on Mercury, implements measures concerning the export of mercury and mercury compounds in a manner consistent with, and in compliance with, the requirements set forth under Article 3 Mercury Supply Sources and Trade of the Convention.

Findings from the report on the global supply, production, trade, and use of mercury compounds.

The Secretariat of the Minamata Convention on Mercury published a report on the global supply, production, trade, and use of mercury compounds on 12 February 2025. The study covers only “mercury compounds” specified under Article 3, paragraph 1(b), namely:

- Mercury(I) (Mercury (I) chloride)
- Mercury(II) (Mercury (II) oxide)
- Mercury(II) (Mercury (II) sulfate)

- Mercury(II) (Mercury (II) nitrate)
- Cinnabar
- Mercury sulfide

In addition, the study also covers other mercury compounds, including: Mercury (II) amidochloride, Mercury (II) acetate, Mercury (II) chloride, Mercury (II) iodide, Mercury (II) thiocyanate, Phenylmercury (II) acetate, Mercury (II) selenide and Thimerosal

According to the report, data on “National imports and exports of mercury compounds have been published. under the customs tariff classification HS 285210” as reported by Thailand to United Nations Commodity Trade Statistics Database which is an online database which compiles global international trade statistics, indicating that “Thailand is a leading exporter of mercury compounds,” as detailed in [Tables 1 and 2.](#)

Table 1. Data on countries exporting more than 5,000 kilograms of mercury compounds (in 2023).

Reporter	HS 285210 - Mercury compounds, chemically defined, inorganic or organic, excluding amalgams (net weight in kg)						Sum
	2018	2019	2020	2021	2022	2023	2018-2023
Thailand	596319	471671	243691	273809	433897	474080	2493467
United States	58696	130411	18675	18755	31303	83841	341681
South Africa	167332	90819	83387	257097	113337	64363	776335
Austria	90420	89789	103947	107428	105789	58755	556128
France	0	0	0	63661	45398	26179	135238
Morocco	91	1550	2605	1010	660	8600	14516
Malaysia	0	0	0	0	0	6200	6200

Source: Trade Data Monitor (2018-2021) and Comtrade (2022-2023)

Table 2. Thailand’s imports and exports of mercury compounds (≥100 kilograms) in 2023.

HS 285210 - Mercury compounds, chemically defined, inorganic or organic, excluding amalgams			
	Trading partner	Quantity (kg)	Value (USD)
Export to	Cambodia	13,868	50,251
Export to	Viet Nam	460,056	1,252,600
Export to	Myanmar	129	357
Import from	Ireland	114	167,294
Import from	Rep. of Korea	195	55,940
Import from	India	352	82,901

The report indicates that between 2018 and 2023, Thailand has been a leading exporter of mercury compounds. under the customs tariff classification HS 285210 In 2023, Thailand exported the following mercury compounds:

1. Exported to Cambodia: *over 5,000 kilograms (13,868 kilograms).*
2. Exported to Vietnam: *over 5,000 kilograms (460,056 kilograms).*
3. Exported to Myanmar: *less than 5,000 kilograms (129 kilograms).*

Verification of the data against the findings from the report on the global supply, production, trade, and use of mercury compounds.

The Pollution Control Department has conducted a verification of Thailand’s mercury compounds export data as follows:

1. Verification of data from the relevant government agencies.

1.1 In the case of mercury compounds exports under the Minamata Convention.

In such cases, the procedure requires obtaining written consent under the Minamata Convention, which must be reviewed by the Pollution Control Department as the national coordinating body for the Convention. It was found that in 2023, Thailand exported only “mercury (pure)” recovered from the treatment of mercury-contaminated waste to India, totaling 36,190 kilograms, solely by BMT Asia Co., Ltd.

1.2 In the case of mercury compounds exports under domestic legislation.

In such cases, the procedure must follow the practices under the Hazardous Substances Act, B.E. 2535 (1992), which requires obtaining export authorization for mercury compounds from the responsible agencies. Accordingly, the Pollution Control Department issued letters to (1) the Department of Industrial Works and (2) the Customs Department to request assistance in verifying mercury compounds export data, with the verification results reported as follows:

1. Data from the Department of Industrial Works indicate that in 2023, Thailand exported 36,190 kilograms of “pure” mercury. with no records of mercury compounds exports.

2. Data from the Customs Department indicate that in 2023 (1 January – 31 December 2023) under the customs tariff classification HS 285210 Thailand exported mercury compounds to Vietnam and Cambodia, as detailed in Table 3.

Table 3. Thailand’s mercury compounds export data in 2023 under the customs tariff classification 285210

Year	Operator	Customs Tariff Code	Statistical Code	Destination	Quantity (KGM)
2023	Sun Siam Co., Ltd.	285210.90	090	KH	14,253.00
	Camel Brand Industrial Co., Ltd.	285210.10	090	VN	5,000.00
		285210.90	090	VN	462,537.00

2. Verification of Information from Business Operators

Based on Thailand’s export data of mercury compounds, as detailed in Table 3, such exports are classified under statistical code 090 (Others). This classification does not allow for the identification of specific types of mercury compounds or their intended uses as prescribed under the Minamata Convention. Therefore, the Pollution Control Department issued formal letters to both companies to request their cooperation in verifying the export data on mercury compounds. The results of the verification are as follows:

2.1 Sun Siam Co., Ltd.

Sun Siam Co., Ltd. primarily engages in the manufacture and distribution of high-quality lubricants. Its product range includes automotive engine oils, gear oils, motorcycle oils, greases, and lubricants for various industrial applications. The company reported that, upon reviewing export declarations for the year 2023, it was found that the shipping agent responsible for handling the company’s export procedures had **declared an incorrect HS Code that did not correspond to the actual exported products.** The category of products exported by the company is “lubricants (HS Code 2710.19.46),” and none of the exported products contain mercury. Further details are provided in [Figure 1](#).

13	RD 002/2023	5 Pails	110.000 KGM (115.500 KGM)	THB 33,000.00	
	"TWISTER BRAND" ประเททกักานัด TH, ฆาอไปอ้ง KH		100.000 LTR (5.000 PL)	THB 33,000.00	
	GEAR OIL, TRANSMISSION FLUID, OTHERS TW UPPER II น้ำมันทดอัดฉัน Permit No: กศ.05-01 เลขวันทึ 66011000102309 0994000160461 10/03/2023		9PART3		FREE
			2710.19.46 090/LTR		0.00
----- INV.NO:RD 002/2023 ----- เข้าหน้าทึ --->					
14	RD 002/2023	1 Drum	179.000 KGM (195.450 KGM)	THB 17,264.00	
	"TWISTER BRAND" ประเททกักานัด TH, ฆาอไปอ้ง KH		208.000 LTR (1.000 DR)	THB 17,264.00	
	GEAR OIL, TRANSMISSION FLUID, OTHERS TW LAMPATA MOTOR OIL น้ำมันทดอัดฉัน Permit No: กศ.05-01 เลขวันทึ 66011000102309 0994000160461 10/03/2023		9PART3		FREE
			2852.10.90 090/KGM		0.00
----- INV.NO:RD 002/2023 ----- เข้าหน้าทึ --->					

Figure 1 Export declaration indicating an HS Code that does not correspond to the actual exported products of Sun Siam Co., Ltd.

In this regard, the Pollution Control Department verified the quantity of exported goods as indicated in the company’s export declarations against the data presented in the report. It was found that the total export volume recorded in the export declarations amounted to 13,814.67 kilograms, which is consistent with and closely corresponds to the data reported in the Global supply, production, trade and use of mercury compounds. As detailed in **Table 2**, the report indicates that Thailand exported 13,868.00 kilograms of mercury compounds to Cambodia.

2.2 Camel Industries Co., Ltd.

Camel Industries Co., Ltd. primarily engages in the manufacture and distribution of tires and inner tubes for motorcycles, bicycles, and mopeds, with its main production bases located in Thailand and Vietnam. The company reported that, upon reviewing export declarations for the year 2023, it was found that the shipping agent responsible for handling the company’s export procedures had **declared an incorrect HS Code that did not correspond to the actual exported products**. The products exported by the company fall under the category of “chemicals used in rubber manufacturing (HS Codes 3812.10.00, 3404.90.00, and 3505.10.00),” which do not contain any mercury compounds. These products were exported to an affiliated company located in Vietnam for use in the production of bicycle and motorcycle tires, as detailed in **Figure 2**.

8	-DO-	25 Bag	500.000 KGM	1,375.00 USD	FREE
			500.000 KGM		
	"NO BRAND"		9PART3 003 50001	44,865.43	
	ZINC STEARATE FOR TIRE สารเร่งเทยางลุด		28521090-090/KGM	0.00	
4	-DO-	25 Bag	น้ำหนักสุทธิ 500.000 KGM	ราคาของ FOB (เงินต่างประเทศ)	ใช้สิทธิพิเศษ
			ปริมาณ 500.000 KGM	1,005.00 USD	อัตราอากร FREE
	"NO BRAND"		ประเภทพิกัด 9PART3 003 50001	ราคาของ FOB (บาท)	
	ZINC STEARATE FOR TIRE แป้งเคมี		รหัสสถิติ หน่วย 28521010-090/KGM	34,695.31 ราคาประเมินอากร 0.00	อัตราอากร 0.00
1	CRV VIETNAM #1-440	20 Bag	น้ำหนักสุทธิ 500.000 KGM	ราคาของ FOB (เงินต่างประเทศ)	ใช้สิทธิพิเศษ
			ปริมาณ 500.000 KGM	1,245.00 USD	อัตราอากร FREE
	"NO BRAND"		ประเภทพิกัด 9PART3 003 50001	ราคาของ FOB (บาท)	
	HMMM แป้งเคมี		รหัสสถิติ หน่วย 28521010-090/KGM	42,476.16 ราคาประเมินอากร 0.00	อัตราอากร 0.00

Figure 2 Export declaration indicating an HS Code that does not correspond to the actual exported products of Camel Industries Co., Ltd.

In this regard, the Pollution Control Department verified the quantity of exported goods as indicated in the company's export declarations against the data presented in the report. It was found that the total export volume recorded in the export declarations amounted to 460,056.00 kilograms, which is consistent with the data reported in the Global supply, production, trade and use of mercury compounds. As detailed in **Table 2**, the report indicates that Thailand exported 460,056.00 kilograms of mercury compounds to Vietnam.

Actions Undertaken Following the Data Verification

According to the results of the report on the Global supply, production, trade and use of mercury compounds for the year 2023, which state that **“Thailand is a leading exporter of mercury compounds”** a verification of the accuracy of such data against the study results for 2023 revealed that Thailand did not export mercury compounds. Instead, Thailand exported only “elemental mercury” derived from the treatment of mercury-contaminated waste, in the amount of 36,190 kilograms, and solely with prior written consent for export to the Republic of India. Such export was conducted in compliance with the requirements set forth under Article 3, paragraph 6 of the Minamata Convention, which stipulates that a Party shall not allow the export of mercury except to another Party that has provided written consent to the exporting Party. In addition, the export was authorized by the Department of Industrial Works under the Hazardous Substances Act B.E. 2535 (1992). In this regard, Thailand is currently in the process of revising export data to ensure alignment with the correct HS Codes in the online United Nations Commodity Trade Statistics Database (UN Comtrade).