



Environment and Social Development Organization

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Submission of Information and Views on Mercury Compounds under Article 3(13)

Submitted by: Environment and Social Development Organization - ESDO

To

Executive Secretary
Minamata Convention on Mercury
UN Environment Programme
Geneva, Switzerland

Dear Executive Secretary,

Greetings from the Environment and Social Development Organization – ESDO!

We are pleased to submit information and our views in response to the invitation issued following the sixth meeting of the Conference of the Parties (COP-6) of the Minamata Convention on Mercury. ESDO welcomes the opportunity to provide input under **Article 3, paragraph 13**, regarding the supply, use, and trade of **mercury compounds**, and to share our perspectives on mercury compounds that could be considered for listing in a possible additional annex under the Convention.

1. Available Information on Supply, Use, and Trade of Mercury Compounds

Supply and Availability

The following mercury compounds are listed under Article 3:

- Mercury (I) chloride (calomel)
- Mercury (II) oxide
- Mercury (II) sulfate
- Mercury (II) nitrate
- Mercury sulfide (cinnabar)

These compounds are mainly available for laboratory, industrial, and limited traditional uses. However, national data on production, import, and export are not disaggregated, and mercury compounds are typically grouped within broader chemical categories. This results in limited traceability of supply sources.

Use

Mercury compounds are used in:

- Laboratory and research applications
- Certain industrial processes and testing
- Limited traditional or informal uses

The presence of mercury in consumer products identified through national studies also indicates **broader systemic gaps in mercury control**, including potential upstream availability of mercury compounds.

Trade

- Mercury compounds are not separately identified in national trade systems
- Imports may occur through both formal and informal channels, including e-commerce
- Due to a lack of classification and reporting, trade flows remain largely unquantified

Partner of





2. Views on Trade and Need for Listing under Article 3(13)

ESDO considers that the **current lack of transparency and control over the trade of mercury compounds may compromise the objective of the Convention**, particularly in contexts where regulatory and monitoring capacity is limited.

Key Concerns

- Absence of clear trade data limits the ability to monitor cross-border movement
- Potential for diversion to informal, unsafe, or non-compliant uses
- Weak traceability increases the risk of mercury re-entering supply chains despite global phase-out efforts

3. Mercury Compounds for Consideration for Listing

Based on the above concerns, ESDO recommends that the following mercury compounds be considered for evaluation for inclusion in a possible annex under Article 3(13):

- Mercury (I) chloride (calomel)
- Mercury (II) oxide
- Mercury (II) sulfate
- Mercury (II) nitrate
- Mercury sulfide (cinnabar)

4. Justification for Listing

Listing these compounds under an additional annex could:

- Make sure exports and imports happen only with prior approval and proper information (paragraphs 6 and 8).
- Improve traceability and transparency in international trade
- Reduce the risk of diversion to non-allowed uses
- Support Parties with limited regulatory capacity in controlling mercury flows

5. Concluding Input

ESDO supports further evaluation of mercury compounds under Article 3(13), particularly in relation to their trade and potential impacts on the objectives of the Convention. Strengthening international control measures for mercury compounds would contribute to improved global mercury management and risk reduction.

With best regards,

Siddika Sultana

Executive Director

Environment and Social Development Organization - ESDO

Partner of

