

Information on the supply, use and trade of mercury compounds

1. Background

Paragraph 13 of article 3 of the Minamata Convention on Mercury requires the Conference of the Parties to undertake an evaluation of whether the trade in specific mercury compounds compromises the Convention's objective of protecting human health and the environment.

In the intersessional process between COP-5 and COP-6 a report on mercury trade compounds was developed and presented to the Conference of the Parties-.

In November 2025, the sixth meeting of the Conference of the Parties adopted decision MC-6/2, in which:

- Encourages parties and stakeholders to reflect on the information contained in the report and to consider the need for an additional annex that would make mercury compounds subject to the trade provisions of paragraphs 6 and 8 of article 3;
- Invites parties and stakeholders to submit to the secretariat, by 31 March 2026, on a voluntary basis, available information on the supply, use and trade of mercury compounds, and to share their views and input on mercury compounds which could possibly be listed in a proposed annex;
- Decides to establish an open-ended expert group whose mandate will be to consider the information in the above-mentioned report and the information submitted in accordance with paragraph 3 above, to work in English in an online setting, and to submit its recommendations to the secretariat no later than eight months before the seventh meeting of the Conference of the Parties;

Taking into account the information presented in the report and the situation of Spain described in the following sections, we would like to share our experience with the Secretariat regarding the trade of mercury compounds.

2. Legal situation

In the European Union, the Minamata Convention is integrated into the legal code through Regulation (EU) 2017/852. This regulation not only incorporates the core provisions of the Minamata Convention but also introduces stricter additional requirements to ensure a higher level of protection for human health and the environment.

This Regulation restricts the trade of mercury compounds in the following articles:

- Article 3 prohibits the export of mercury compounds listed in Annex I except for the purposes of laboratory-scale research or laboratory analysis
- Article 4 prohibits the import of mercury compounds for the purpose of reclaiming mercury

Annex I of Regulation 2017/852 includes the following mercury compounds:

Name	Chemical Formula	CAS number
Mercury (I) chloride	Hg ₂ Cl ₂	10112-91-1
Mercury (II) oxide	HgO	21908-53-2
Cinnabar ore		
Mercury sulfide	HgS	1344-48-5
Mercury (II) sulphate	HgSO ₄	7783-35-9
Mercury (II) nitrate	Hg(NO ₃) ₂	10045-94-0

3. Analysis of mercury compounds trade

This data includes only imports and exports with non-EU countries.

Imports

Mercury compound	CAS number	2021		2022		2023		2024	
		kg	%	kg	%	kg	%	kg	%
Mercury (II) sulphate	7783-35-9	0	unk	200	unk	0	unk	100	unk
Mercury II Iodide	7774-29-0	0	Unk	80	Unk	0	Unk	177.5	Unk
Mercury (II) oxide	21908-53-2	0	Unk	0	Unk	5	Unk	0	Unk
Mercury (II) chloride	7487-94-7	0	Unk	0	Unk	180	Unk	31	Unk
Mercury (II) nitrate monohydrate	7783-34-8	0	Unk	80	Unk	0	Unk	90	Unk
Mercury (II) amidochloride	10124-48-8	500	Unk	0	Unk	0	Unk	500	Unk

Mercury compound	CAS number	Included in annex I of Regulation 2017/852	Use as registered by importer
Mercury (II) sulphate	7783-35-9	Yes	Research or analysis, and laboratory reagent
Mercury II Iodide	7774-29-0	No	Research or analysis, and laboratory reagent
Mercury (II) oxide	21908-53-2	Yes	Research or analysis
Mercury (II) chloride	7487-94-7	No	Research or analysis, and laboratory reagent
Mercury (II) nitrate monohydrate	7783-34-8	No	Analytical standard, and undisclosed laboratory use
Mercury (II) amidochloride	10124-48-8	No	Laboratory reagent

Exports

Mercury compound	CAS number	2021		2022		2023	
		kg	%	kg	%	kg	%
Mercury (II) sulphate	7783-35-9	105	unk	94.5	unk	67	unk
Mercury (II) acetate	1600-27-7	15	unk	45	unk	0	unk
Mercury (II) iodide	7774-29-0	119.08	4 - 15%	154.08	4 - 15%	65	4 - 15%
Thiomersal	54-64-8	112	unk	122	unk	100	unk
Mercury (II) oxide	21908-53-2	0	unk	15	unk	15	unk
Mercury (II) chloride	7487-94-7	255.5	unk	365.5	unk	354	unk

Mercury (II) nitrate monohydrate	7783-34-8	32	0.16	52	0.16	24	0.16
Mercury (II) nitrate	10045-94-0	68.7	0.16 – 1.5	80.8	0.16 – 1.5	60.8	0.16 – 1.5
Mercury (II) amidochloride	10124-48-8	0	unk	139	unk	0	unk

Mercury compound	CAS	Included in annex I of Regulation 2017/852	Use as registered by importer
Mercury (II) sulphate	7783-35-9	Yes	Undisclosed laboratory use
Mercury (II) acetate	1600-27-7	No	Undisclosed laboratory use
Mercury (II) iodide	7774-29-0	No	Nessler's reagent
Thiomersal	54-64-8	No	Research or analysis, and undisclosed laboratory use
Mercury (II) oxide	21908-53-2	Yes	Research and development
Mercury (II) chloride	7487-94-7	No	Research or analysis, and undisclosed laboratory use
Mercury (II) nitrate monohydrate	7783-34-8	No	Analytical standard, and undisclosed laboratory use
Mercury (II) nitrate	10045-94-0	Yes	Analytical standard
Mercury (II) amidochloride	10124-48-8	No	Research or analysis, and undisclosed laboratory use

4. Conclusions

Thanks to the provisions on mercury compounds of Regulation 2017/852, Spain has restricted the trade of mercury compounds.

The Regulation prohibits the import of mercury compounds for the purpose of reclaiming mercury. Some companies have imported compounds with the purpose of using them in research or analysis and in some cases as reagents in small scale reactions.

Exports of mercury compounds included in Annex I of Regulation 2017/852 also complied with the provisions of the Regulation as they were registered for laboratory-scale use, research or analysis. Mercury compounds exported but not included in Annex I were also registered under these uses by the importer.

According to our data, there is no evidence of the use of mercury compounds for reclaiming mercury as a consequence of our trade with other countries, However, these compounds may be used as reagents in obsolete chemical synthesis or analytical techniques that could cause a negative impact to human health and the environment.

Uses and alternatives

Most of the mercury compounds studied are used in research or analysis and the trade for this use should be allowed. However, the trade of mercury iodide raises several questions. This compound is primarily used as a reagent In the Nessler reaction, an analytical method used to detect

ammonia and ammonium ions. If this compound is considered in any restriction list, it should be clarified if this reaction qualifies as “analytical use” as mercury-free alternatives are available for this specific use.

In this line, the use of mercury compounds in obsolete chemical reactions and analysis should be discouraged, promoting the use of mercury free alternatives.

Data collection

Exemptions for the use of mercury compounds for research and analysis may be used to circumvent existing and future restrictions on mercury compounds trade. Therefore, it is important to gather accurate data about specific use, weight and concentration of the batches of mercury compounds allowed under this exemption.

In addition, companies involved in the trade of mercury compounds should participate in the intersesional process, providing information about trade volumes, concentrations and potential use of mercury compounds.