

Mercury Compounds Submission from the United States of America

March 2026

(Submitted June 2026)

Article 3, paragraph 13 of the Minamata Convention on Mercury (the Convention) requires the Conference of the Parties (COP) to evaluate whether the trade in specific mercury compounds compromises the Convention's objective of protecting human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds and to consider whether specific mercury compounds should, by their listing in an additional annex adopted in accordance with Article 27 of the Convention, be made subject to paragraphs 6 and 8 of Article 3.

Decision MC-6/2 of the Conference of the Parties invited Parties and stakeholders to submit, on a voluntary basis, available information on the supply, use, and trade of mercury compounds to the Secretariat by March 31, 2026, and to share their views and input on possible mercury compounds which could be listed in a proposed annex. The decision indicates that such compounds are limited to those that may be used in products or processes or can be converted to elemental mercury. The decision also specifies that compounds that fall within the definition of mercury wastes in Article 11, paragraph 2, are outside the scope of this invitation.

With respect to available information on the supply, use, and trade of mercury compounds, every three years the United States is required under Section 8(b) of the Toxic Substances Control Act (TSCA) (Pub. L. No. 94-469), as amended in 2008 by the U.S. Mercury Export Ban Act (MEBA) (Pub. L. No. 110-414) and in 2016 by the Frank R. Lautenberg Chemical Safety for the 21st Century Act (Lautenberg Act) (Pub. L. No. 114-182), 15 U.S.C. 2607(b)(10)(B), to compile and publish, assisted by information received from relevant stakeholders as required by the Mercury Inventory Reporting Rule, 40 CFR Part 713, an inventory of mercury supply, use, and trade in the United States. The Lautenberg Act defines "mercury" as "elemental mercury" or "a mercury compound."

Additionally, in 2016, the Lautenberg Act expanded Section 12(c) of TSCA, which included the prohibition of five mercury compounds. In enacting MEBA in 2008, the U.S. Congress expressed its concern about the use of U.S. mercury in dispersive practices involving mercury in other countries and the impacts of global mercury releases on the United States. Under MEBA, exports of elemental mercury were generally prohibited; the law also provided for long-term management and storage of elemental mercury in the United States and prevented the sale, distribution, or transfer of elemental mercury held by U.S. federal agencies. The five mercury compounds that the mercury export ban was expanded to include via the 2016 Lautenberg Act are: mercury (I) chloride or calomel, mercury (II) oxide, mercury (II) sulfate, mercury (II) nitrate, and cinnabar or mercury sulfide. The export ban on these five compounds took effect on January 1, 2020.

The Office of Chemical Safety and Pollution Prevention at the U.S. Environmental Protection Agency (U.S. EPA) will publish its third iteration of the mercury inventory report in 2026, which will present a comprehensive picture of the information required by law to be reported to U.S. EPA on mercury supply, use, and trade in the United States, including with respect to mercury compounds (U.S. EPA's TSCA Chemical Substance Inventory lists 38 mercury compounds as commercially available in the United States). Once the inventory report has been published, the United States will look forward to sharing further views and input on whether there is trade in specific mercury compounds that compromises the Convention's objective of protecting human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds such that the Parties should consider listing such compounds, should there be any, in an additional annex to the Convention in accordance with its Article 27. In the interim, the United States would like to note that it did provide comments with respect to UNEP/MC/COP.6.5/Add.1 that the expert group will hopefully be able to consider further and offers the following information, some of which has already been described above, to assist the expert group in its consideration of available information for its submission of recommendations, as requested by Decision MC-6/2.

SUPPLY

	2018	2021**	2024**	Δ 2018-2024
Manufactured in the United States*	219	84	5	-214
Stored On-site (max) for Manufacturers and Processors*	1,411	1,810	645	-766
Stored Off-site (max) for Manufacturers and Processors*	185	0	0	-185
* All measurements are in pounds (lbs.).				
**These numbers do not include mercury sulfide (CASRN 1344-48-5) related to waste/disposal operations.				

- For 2024, the 5 lbs. of mercury compounds manufactured in the United States consisted of cadmium mercury telluride (CASRN 29870-72-2), which were reported by two companies for use in guided missile, space vehicle, and semiconductor manufacturing.
- In 2024, the 645 lbs. of mercury compounds stored on-site were reported by nine companies and consist primarily of formulated products (e.g., preservatives, reagents) for use in laboratory or diagnostic materials, as well as for use in guided missile, space vehicle, and semiconductor manufacturing.
- The mercury compounds reported as being stored on-site in 2024 include:
 - Mercury (II) acetate (CASRN 1600-27-7)
 - Mercurate (1-), (4-carboxylatophenyl) hydroxy-, sodium (1:1) (CASRN 138-85-2)
 - Mercurate(1-), ethyl[2-(mercapto-.kappa.S)benzoato(2-).kappa.O]-,sodium (1:1) (CASRN 54-64-8)
 - Thiocyanic acid, mercury (2+) salt (2:1) (CASRN 592-85-8)
 - Mercury, (acetato-.kappa.O) phenyl- (CASRN 62-38-4)
 - Mercury, (acetato-.kappa.O)(4-aminophenyl)- (CASRN 6283-24-5)
 - Mercury iodide (HgI₂) (CASRN 7774-29-0)
 - Sulfuric acid, mercury (2+) salt (1:1) (CASRN 7783-35-9)
 - Mercury bromide (HgBr₂) (CASRN 7789-47-1)
 - Mercury (II) nitrate monohydrate (CASRN 7783-34-8)
 - Basic phenylmercury nitrate (CASRN 8003-05-2)
 - Cadmium mercury telluride (CASRN 29870-72-2)
- After an initial total of 185 lbs. stored off-site in 2018, no mercury compounds were reported as such in reporting years 2021 and 2024.
- As a potential point of interest, mercury sulfide* was reported to the mercury inventory for CASRN 1344-48-5 for 2021 (169,050 lbs.) and 2024 (108,675 lbs.). These numbers are not included in this submission as they relate to waste/disposal operations.

USE

	2018	2021	2024	Δ 2018-2024
Sold in the United States*	1,393	45	381	-1,012
In Products Made in the United States*	1,907	1,979	2,645	+738
Products Sold in the United States *	442	252	227	-215
Mercury Used in a Manufacturing Process*	34	485	134	+100
*All measurements are in pounds (lbs.).				

- For 2024, the 381 lbs. of mercury compounds sold in the United States were reported by six companies and consisted primarily of formulated products (e.g., preservatives, reagents) for use in laboratory or diagnostic materials, as well as for use in guided missile, space vehicle, and semiconductor manufacturing.
- The mercury compounds reported as being sold in the United States include:
 - Mercury (II) acetate (CASRN 1600-27-7)
 - Mercurate (1-), (4-carboxylatophenyl) hydroxy-, sodium (1:1) (CASRN 138-85-2)
 - Mercurate (1-), ethyl[2-(mercapto-.kappa.S)benzoato(2-).kappa.O]-, sodium (1:1) (CASRN 54-64-8)
 - Thiocyanic acid, mercury (2+) salt (2:1) (CASRN 592-85-8)
 - Mercury, (acetato-.kappa.O) phenyl- (CASRN 62-38-4)
 - Mercury, (acetato-.kappa.O)(4-aminophenyl)- (CASRN 6283-24-5)
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 - Mercury (II) nitrate monohydrate (CASRN 7783-34-8)
 - Basic phenylmercury nitrate (CASRN 8003-05-2)
 - Cadmium mercury telluride (CASRN 29870-72-2)
- In 2024, the 2,645 lbs. of mercury compounds made in the United States were reported by seventeen companies and consisted primarily of formulated products (e.g., preservatives, reagents) for use in laboratory or diagnostic materials, as well as for use in semiconductor wafers and infrared sensors.
- In 2024, 227 lbs. of mercury compounds were reported by twenty-one companies as being sold in the United States and consisted primarily of formulated products (e.g., preservatives, reagents) for use in laboratory or diagnostic materials, as well as uses in semiconductor wafers, mercury vapor lamps, alkaline batteries, and pressure switches.
- In 2024, 134 lbs. of mercury compounds were reported by three companies as being used in a manufacturing process, primarily to produce polyurethane.
- Mercury sulfide* reported to the mercury inventory for CASRN 1344-48-5 that relates to waste/disposal operations are not included in this submission.

TRADE

	2018	2021	2024	Δ 2018-2024
Imported*	248	245	346	+98
In Imported Products*	1,459	7,229	352	-1,107
Exported*	148	176	81	-67
In Exported Products*	2,053	962	179	-1,874
*All measurements are in pounds (lbs.).				

- In 2024, the 346 lbs. of mercury compounds imported into the United States were reported by four companies.
- The mercury compounds reported as being imported into the United States include:
 - Mercurate (1-), ethyl[2-(mercapto-.kappa.S) benzoato (2-).kappa.O]-, sodium (1:1) (CASRN 54-64-8)
 - Mercury, (acetato-.kappa.O) phenyl- (CASRN 62-38-4)
 - Mercurate (1-), (4-carboxylatophenyl) hydroxy-, sodium (1:1) (CASRN 138-85-2)
 - Thiocyanic acid, mercury (2+) salt (2:1) (CASRN 592-85-8)
 - Acetic acid, mercury (2+) salt (2:1) (CASRN 1600-27-7)
 - Mercury iodide (HgI₂) (CASRN 7774-29-0)
 - Sulfuric acid, mercury (2+) salt (1:1) (CASRN 7783-35-9)
 - Mercury bromide (HgBr₂) (CASRN 7789-47-1)
 - Basic phenylmercury nitrate (CASRN 8003-05-2)
 - Mercury, (acetato-.kappa.O)(4-aminophenyl)- (CASRN 6283-24-5)
- For 2024, the 352 lbs. of mercury compounds imported into the United States in products were reported by twenty-three companies and included a variety of lighting, lamps, and bulbs, as well as formulated products, alkaline batteries, and pressure switches.
- In 2024, the 81 lbs. of mercury compounds exported from the United States were reported by two companies.
- The mercury compounds reported as being exported from the United States include:
 - Mercurate (1-), ethyl[2-(mercapto-.kappa.S)benzoato(2-).kappa.O]-, sodium (1:1) (CASRN 54-64-8)
 - Mercury, (acetato-.kappa.O) phenyl- (CASRN 62-38-4)
 - Mercurate (1-), (4-carboxylatophenyl) hydroxy-, sodium (1:1) (CASRN 138-85-2)
 - Thiocyanic acid, mercury (2+) salt (2:1) (CASRN 592-85-8)
 - Acetic acid, mercury (2+) salt (2:1) (CASRN 1600-27-7)
 - Sulfuric acid, mercury (2+) salt (1:1) (CASRN 7783-35-9)
 - Mercury (II) nitrate monohydrate (CASRN 7783-34-8)
 - Mercury iodide (HgI₂) (CASRN 7774-29-0)
 - Mercury bromide (HgBr₂) (CASRN 7789-47-1)
 - Basic phenylmercury nitrate (CASRN 8003-05-2)
 - Mercury, (acetato-.kappa.O) (4-aminophenyl)- (CASRN 6283-24-5)
- In 2024, the 179 lbs. of mercury compounds exported from the United States in products were reported by twenty-three companies and included a nearly equal blend of formulated products and lighting, lamps, and bulbs, as well as infrared sensors.
- Mercury sulfide* reported to the mercury inventory for CASRN 1344-48-5 that relates to waste/disposal operations are not included in this submission.