

State of Qatar

Ministry of Environment and Climate Change

Chemical and Hazardous Waste Department

Date: 30/6/2026

To: Secretariat of the Minamata Convention on Mercury

United Nations Environment Programme (UNEP)

Subject: Submission on Challenges Associated with the Implementation of Obligations Related to Mercury-Added Cosmetics under Annex A, Part I of the Minamata Convention on Mercury

Dear Sir/Madam,

The State of Qatar is pleased to submit its observations in response to the invitation of the Secretariat regarding the challenges associated with the implementation of obligations related to mercury-added cosmetics under Annex A, Part I of the Minamata Convention on Mercury, as well as proposed measures to support effective implementation.

I. Key Challenges Identified

In this context, the State of Qatar notes several common challenges at the international level, which require further efforts and enhanced coordination, including the following:

1. Limitations in the current customs classification system, as Harmonized System (HS) codes, do not clearly distinguish between mercury-added cosmetics and products compliant with the requirements of the Minamata Convention, thereby limiting the effectiveness of import and export controls.
2. The need for clear, consistent, and internationally harmonized technical guidance to differentiate between trace contaminants and intentional use of mercury, in addition to the absence of unified indicative threshold levels.
3. Technical constraints arising from the lack of standardized identification methods and reliance on laboratory testing to verify compliance, alongside the need to strengthen technical and analytical capacities for detecting mercury content.
4. Challenges related to international coordination in enforcement, including limited resources, cross-border supply chains, and the continued circulation of non-compliant

products, as well as the need to enhance information sharing and technical expertise among countries.

5. The rapid expansion of e-commerce channels and the complexities they introduce in terms of control and regulation, combined with the difficulty of tracking products purchased through online platforms or received via personal shipments, increase the risk of non-compliant products entering the market.
6. The need to strengthen oversight of international supply chains, particularly with respect to mercury compounds that may be used for dual purposes.
7. Variations in institutional capacities and coordination among relevant authorities at the international level, resulting in uneven levels of control that may increase the risk of non-compliant products entering markets through weaker control points.
8. Continued demand for skin-lightening products, driven by limited awareness among consumers, importers and traders, contributing to the ongoing production and circulation of non-compliant products.
9. Challenges associated with managing the transitional phase of mercury phase-out, including handling existing products and stockpiles.

These challenges are cross-cutting in nature and cannot be effectively addressed at the national level alone, requiring coordinated international action.

II. Proposed Measures

In this regard, the State of Qatar encourages the Secretariat and Parties to consider the following measures:

1. Promoting the update of Harmonized System (HS) codes or the introduction of more detailed sub-codes at the international level through the World Customs Organization (WCO), to enable clearer differentiation between mercury-added and compliant products, thereby improving classification accuracy and enhancing compliance with the Convention.
2. Development of technical guidance by the Secretariat to harmonize the differentiation between contamination and intentional use of mercury, including the establishment of non-binding indicative threshold levels.
3. Development and standardization of identification methods for detecting mercury content, alongside strengthening technical and analytical capacities and supporting laboratories, to reduce sole reliance on laboratory testing.
4. Strengthening international coordination in enforcement by enhancing cooperation among regulatory and customs authorities, developing mechanisms for information sharing and exchange of technical expertise, and supporting capacity-building efforts to improve monitoring across cross-border supply chains.
5. Regulating e-commerce channels by engaging online platforms, clarifying roles and responsibilities, and enhancing information exchange and awareness, thereby supporting

the implementation of effective control measures and reducing the circulation of non-compliant products.

6. Strengthening supply chain controls, particularly regarding mercury compounds that may be used in the production of cosmetics.
7. Expanding capacity-building programmes under Article 14, with a focus on strengthening institutional coordination among authorities responsible for inspection and enforcement.
8. Implementing public awareness initiatives to reduce demand and promote safe and compliant alternatives.
9. Establishing transitional strategies with clear timelines and guidance for managing existing and non-compliant products, ensuring safe and gradual phase-out.

III. Conclusion

The State of Qatar reaffirms its strong commitment to fulfilling its obligations under the Minamata Convention. Addressing the above challenges requires enhanced technical support, strengthened international cooperation, and the development of practical and harmonized guidance.

Qatar looks forward to continuing collaboration with the Secretariat and other Parties to advance effective, consistent, and implementable measures aimed at eliminating mercury-added cosmetics at the global level.

Yours sincerely,

For and on behalf of the State of Qatar

Aisha Shikh Baobad

National Focal Point for the Minamata Convention

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