Mercury Supply and Trade: Investigative Findings and Recommendations

EIA submission to the Minamata Convention Secretariat in response to decision MC-6/1

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Executive summary

The Environmental Investigation Agency (EIA US) welcomes the opportunity to share findings from its investigations of mercury supply and trade. EIA's work in the Americas, West Africa and international trading hubs identifies three related challenges relevant to implementation of the Minamata Convention: detecting mercury concealed in shipments declared as other goods; interpreting and applying the Convention's definition of primary mercury mining where mercury is recovered and commercialized alongside other metals; and maintaining oversight as mercury is traded and distributed after lawful import. These challenges arise at different stages of the supply chain and call for complementary measures under Article 3 and related provisions.

In July 2025, EIA published *Traffickers Leave No Stone Unturned*, documenting a Mexico-origin trafficking operation estimated to have moved more than 200 tonnes of mercury toward South American gold-mining markets between April 2019 and June 2025. Customs interventions in Peru and Bolivia between June 2025 and July 2026 demonstrated how mercury can be concealed in crushed stone, acrylic paint and automotive batteries. EIA's continued exchanges with enforcement authorities underline the importance of examining the wider commercial networks behind individual shipments. [1-5]

A second issue concerns the definition of primary mercury mining under Article 2(i), which turns on whether mercury is the *principal material sought*. UNEP's 2017 assessment classified mercury recovered from Tajikistan's Anzob antimony-mercury operation as by-product mercury, but that historical supply classification does not itself resolve how the Convention's legal definition applies to operations in which mercury is deliberately recovered and commercialized alongside another metal. The scale of mercury-related activity and international trade makes this question particularly significant. Tajikistan reported approximately 1,753 tonnes of mercury exports between 2018 and 2023, while EIA's investigation obtained accounts of approximately 400 tonnes in annual mercury-related activity associated with Anzob. EIA's investigations and trade-record analysis identified substantial mercury exports from Tajikistan to the United Arab Emirates (UAE) and, separately, UAE-linked mercury supplies reaching West Africa and South America, including Togo, Bolivia and the Guiana Shield. These findings point to supply and distribution networks connected to gold-mining markets in West Africa and the Amazon, without establishing a continuous shipment-level chain from Tajikistan to those downstream markets. Together, these findings highlight the importance of clarifying how the Convention's source restrictions apply to commercially significant mercury recovered from polymetallic operations. [6, 7, 8, 11, 12, 18, 19, 26]

EIA's investigations in West Africa and the Guiana Shield, together with Brazilian Federal Highway Police (PRF) seizures in 2026, illustrate a further challenge: mercury entering regional commerce through

import and wholesale channels may subsequently be diverted across national borders into illegal gold-mining economies. In West Africa, EIA investigations identified Togo's Port of Lomé as a significant mercury trading hub, documenting accounts of mercury being smuggled or otherwise transported onward to Ghana, Burkina Faso and other regional markets. In South America, EIA's investigations in Guyana and Suriname documented regional distribution networks serving Brazilian gold-mining demand. In March 2026, the PRF seized 217.8 kg of mercury reportedly acquired in Guyana and intended for illegal gold mining in Roraima. This was one of several interceptions in the region during the first half of 2026; by the end of June, the PRF reported having seized approximately 1.08 tonnes of mercury on federal highways in Roraima since the beginning of the year. Together, these findings reinforce the importance of monitoring mercury stocks, commercial transfers and downstream distribution beyond customs release. [14, 15, 19, 25, 26]

EIA encourages the Secretariat and Parties to build on existing implementation efforts by strengthening intelligence exchange and risk-based customs enforcement; developing practical guidance on interpreting and applying the Article 2(i) definition of primary mercury mining to polymetallic operations; maintaining information on mercury's original production source through international re-export; strengthening post-import monitoring of mercury stocks, sales and subsequent transfers, including cross-border cooperation to prevent diversion into illegal gold mining; and supporting the safe handling and environmentally sound management of seized mercury.

1. Lessons from mercury concealed in ordinary commercial cargo

EIA's investigations examined how mercury originating in Mexico reaches artisanal and small-scale gold-mining (ASGM) markets in Bolivia, Colombia and Peru through international trafficking networks. Between 2023 and 2025, EIA combined undercover research with customs and shipping records to investigate a Mexico-origin trafficking operation. EIA estimated that this network had trafficked more than 200 tonnes of mercury between April 2019 and June 2025. These findings were published in *Traffickers Leave No Stone Unturned*. [1]

One of the main findings was that mercury can cross borders concealed in shipments declared as other commodities, without being recorded as mercury in international trade statistics. The network relied on ordinary commercial cargo, established logistics arrangements and trading relationships across multiple jurisdictions to move the substance toward gold-mining markets.

In June 2025, Peru's customs authority (SUNAT) intercepted a consignment from Mexico declared as approximately 20 tonnes of crushed stone. SUNAT reported mercury in the shipment and estimated that approximately four tonnes could be recovered. Prior to the interception, EIA had shared intelligence concerning the concealment method and the commercial network with relevant enforcement authorities. [1, 2]

Two subsequent cases illustrate the variety of methods used to conceal mercury in commercial cargo:

- Bolivia, January 2026. Bolivian Customs identified mercury concealed in Mexico-origin acrylic paint routed through Chile. Prosecutors reported a consignment of 216 paint buckets weighing

approximately six tonnes in total, including the paint and packaging, and initiated an investigation. [3, 4]

- Peru, July 2026. SUNAT reported seizing approximately 2.5 tonnes of liquid mercury concealed in automotive batteries. The authority attributed the detection to customs intelligence, risk analysis and inspection. [5]

These interventions demonstrate the value of examining trade patterns, suppliers, freight relationships and destination markets alongside conventional commodity classification. Detecting particular concealment methods is important, but identifying the commercial networks behind shipments can also help authorities recognize changes in packaging, transport and routing.

EIA's investigative engagement has continued beyond the publication of its 2025 report. Throughout 2026, EIA maintained direct exchanges with authorities in Peru and Mexico, provided investigative intelligence in support of ongoing inquiries, and facilitated cross-border information sharing among relevant enforcement counterparts. This experience underscores the importance of sustained cooperation between investigative civil-society organizations and competent authorities, particularly when trafficking networks operate across multiple jurisdictions.

Practical lessons: effective enforcement benefits from timely intelligence sharing with appropriate confidentiality safeguards, risk-based customs targeting, laboratory capacity, safe procedures for inspecting hazardous cargo, and coordination among customs agencies, environmental authorities, police and prosecutors. Seizures must also be accompanied by secure storage and environmentally sound management of recovered mercury, supported by appropriate technical and financial assistance.

2. Applying the definition of primary mercury mining to polymetallic operations

Article 3 establishes important distinctions between mercury from primary mercury mining and mercury from other sources. Mercury from primary mercury mining is subject to source-specific phase-out and use restrictions that do not automatically apply to mercury recovered from other industrial activities, although other Convention and national controls remain relevant. Article 2(i) defines primary mercury mining as mining in which the *principal material sought is mercury*. The Convention does not, however, specify how this criterion should be applied where a mining operation deliberately produces and commercially markets both mercury and another metal. [7]

The distinction between industrial supply classifications and the Convention's legal definition is therefore important. UNEP's 2017 *Global Mercury: Supply, Trade and Demand* report defined by-product mercury, expressly for the purposes of its global supply assessment, by reference to mercury naturally occurring in ores and separated through industrial or chemical processes. This process-based classification differs from determining what material is principally sought through mining. UNEP classified mercury from Tajikistan's Anzob operation as by-product mercury because antimony was considered its principal output. That historical supply classification is an important technical reference, but it does not itself resolve the operation's legal classification under Article 2(i). [6, 7]

UNEP also recognized the regulatory consequences of this distinction in its discussion of mercury recovered from zinc and antimony operations in China, including the Xunyang antimony-mercury mine. The report observed that such sources *may not* be considered primary mercury mining and consequently may fall outside the phase-out and use restrictions specific to that category. However, it did not establish criteria for determining how the Convention's definition should apply where mercury is deliberately recovered and commercialized alongside another metal. [6]

The distinction is relatively straightforward where mercury is removed principally as an unwanted contaminant. It becomes more complex where a polymetallic operation deliberately exploits mercury-bearing ores, invests in dedicated recovery infrastructure and markets mercury as a substantial commercial product. Such circumstances may involve incidental by-product recovery, commercially significant by-product recovery, or potential co-production. These are analytical distinctions rather than categories established by the Convention. Article 2(i) does not specify whether mercury must be the single dominant product or may be considered a principal material sought alongside another metal, nor does it establish quantitative criteria for making that determination.

Tajikistan's Anzob/Jijikrut antimony-mercury operation illustrates why this distinction matters. The country's 2014 Extractive Industries Transparency Initiative report describes concentrates historically containing 40-60% antimony and up to 1% mercury, while separately identifying deeper ore zones with mercury concentrations above 1%. These figures concern different stages of mining and processing; neither represents annual elemental mercury production. [6, 12]

EIA's investigations provide further evidence of the potential commercial significance of mercury at the operation. During EIA's 2025 investigation, individuals associated with Anzob described approximately 400 tonnes in annual mercury-related activity, with higher volumes reported for earlier periods. Although the precise accounting basis of these figures has not been established, their reported scale warrants examination of whether mercury is merely incidental to antimony production or also a significant commercial objective of the mining activity. [18]

The scale of international trade further underscores the relevance of this question. Tajikistan reported approximately 1,753 tonnes of mercury exports between 2018 and 2023, including 824.6 tonnes worth approximately US$22.7 million declared as destined for the United Arab Emirates (UAE) in 2023. These are national export figures, not independently verified production quantities attributable to Anzob. Nevertheless, they illustrate the commercial scale at which questions concerning mercury's original production source and classification may arise. [11]

Determining whether mercury is a principal material sought cannot depend on a particular tonnage, ore grade or revenue percentage alone. Relevant evidence may include mining licences and mine plans, ore-selection priorities, investment in mercury-specific recovery infrastructure, production targets, sales arrangements and the extent to which mercury commercialization influences extraction and processing decisions. Such information could help competent authorities assess the actual objectives of a polymetallic operation without presupposing that Anzob or any other facility meets the Convention's definition of primary mercury mining.

A further issue is what happens to mercury recovered during industrial processing. Recovering mercury can help prevent harmful releases to the environment, but the recovered mercury may subsequently be sold into commercial markets. Practical guidance could recognize the environmental benefits of recovery while addressing how mercury that enters commercial trade should be classified and managed.

The interpretation of Article 2(i) has practical implications for international mercury trade, particularly for source certification and for maintaining information about mercury's original source through subsequent re-export. Where Article 3(8) applies, a Party importing mercury from a non-Party must obtain certification that the mercury does not originate from the sources identified as prohibited under Article 3(3) or 3(5)(b). The Convention's Form C provides for this certification. Tajikistan is not a Party to the Convention, whereas the UAE is, making the Tajikistan-UAE corridor particularly relevant to understanding how mercury's original production source is characterized and verified for international trade. [7, 21]

The question is therefore not only whether the original mine or recovery facility can be identified, but also what evidence supports the certification of its mercury source. Where mercury is commercially recovered alongside another metal, the industrial description of the operation or an existing by-product classification may not be sufficient to resolve the Article 2(i) question. Practical guidance clarifying how to apply the existing Article 2(i) definition, particularly the *principal material sought* criterion, would assist competent authorities in evaluating source certifications and their supporting documentation.

Re-export raises a separate challenge concerning continuity of source information. In 2023, Tajikistan reported 824.6 tonnes of mercury exports to the UAE, whereas UAE import records reported approximately 418.4 tonnes from Tajikistan. This discrepancy warrants comparison of reporting periods, customs procedures and underlying trade records. The UAE also reported mercury exports to other markets, including Togo and Ghana.

Separately, shipment-level records reviewed by EIA identified five Bolivian mercury import declarations from 2022-2023, totaling approximately 43.2 tonnes in declared gross weight, that recorded Tajikistan as the country of origin and the UAE as the country of provenance. More recent declarations from October 2025 and May 2026 identified UAE-based suppliers and recorded the UAE as the country of origin, including one shipment listing Hong Kong as its port of shipment. While these records document declared origins and commercial or routing connections, they do not independently establish the original mine or recovery facility, nor a continuous physical chain of custody through the UAE.

Together, the aggregate and shipment-level evidence illustrates the importance of maintaining information about mercury's original production source and classification as it moves through international trading hubs. [8, 11, 13]

EIA recommends that Parties consider practical arrangements to preserve original-source and source-classification documentation through changes of ownership and re-export. Such measures could build on existing Article 3 consent and certification processes without requiring a new non-Party Form C for each subsequent Party-to-Party transaction.

EIA's experience under the Montreal Protocol offers relevant lessons for mercury source verification and trade oversight. EIA's investigations of illegal trade in ozone-depleting substances documented cases in which newly produced chlorofluorocarbons (CFCs) were falsely declared as recovered or recycled material to circumvent restrictions on new supply. Investigations also demonstrated how transit countries, commercial intermediaries and incomplete documentation could obscure the original source and destination of controlled substances. Unlike the documented CFC cases, the question concerning mercury recovered from polymetallic operations may involve legal interpretation rather than misrepresentation. Nevertheless, this experience highlights a broader principle relevant to the Minamata Convention: regulating a hazardous substance according to its production source requires both a clear legal distinction between source categories and an effective means of verifying the factual basis of that classification. [22, 23, 27]

The Montreal Protocol's voluntary informal Prior-Informed Consent (iPIC) mechanism also illustrates how information-sharing and consultations between trading authorities can complement existing controls. As Article 3 of the Minamata Convention already requires written consent for covered mercury exports, the relevant lesson is to strengthen verification of original-source claims and continuity of supporting documentation through re-export, without prejudging the legal status of any particular operation. [24]

In 2025, the Ozone Secretariat reviewed licensing systems for controlled substances in 100 Parties to the Montreal Protocol. The review identified gaps in some national systems concerning exports and re-exports, transit and free-trade zones, online commerce, and controls over used and reclaimed substances. It also highlighted potentially replicable practices, including electronic licensing integrated with customs systems, cross-checking of trade information and documentation of downstream distribution. These experiences may inform efforts to strengthen verification and trade oversight under the Minamata Convention. [28]

3. Maintaining oversight over mercury after import

Source identification and import authorization are important, but after import mercury may subsequently be resold, divided into smaller quantities, transferred through intermediaries or transported across borders. At each stage, it may become more difficult to trace mercury from its initial import documentation to its ultimate destination or use. Article 7 and Annex C recognize the importance of strategies to manage mercury trade and prevent its diversion into artisanal and small-scale gold mining (ASGM). [7]

Guyana provides a relevant national example. Its 2016 Minamata Initial Assessment identified difficulties tracking mercury after customs release, while its 2021 ASGM National Action Plan called for improved licensing, transaction documentation, stock monitoring and controls over subsequent distribution. These documents demonstrate that Guyana has long recognized the challenge and provide a foundation for strengthening traceability. [9, 10]

During fieldwork in Guyana and Suriname in 2026, EIA investigated a regional mercury market involving licensed importers, wholesalers, smaller intermediaries and buyers linked to gold mining. Guyanese

commercial sources described obtaining mercury through Dubai-based suppliers and selling to buyers serving markets beyond Guyana. Several interviewees identified Brazilian gold-mining demand as a significant destination for mercury circulating in the region. [19]

These findings illustrate an important distinction between authorized importation and subsequent distribution. Mercury may enter through a formal import system and pass through domestic wholesale channels before buyers or other intermediaries arrange its onward movement. Import authorizations and initial sales receipts do not necessarily establish the mercury's ultimate destination or use.

Brazilian enforcement actions independently corroborate the cross-border movement of mercury acquired in Guyana toward illegal gold-mining markets. On 29 March 2026, the Brazilian Federal Highway Police (PRF) seized 217.8 kg of mercury reportedly acquired in Guyana and intended for illegal gold mining in Roraima. A second interception that day brought the combined quantity to approximately 399 kg. In April, the PRF seized a further 36 kg acquired in Guyana, as well as approximately 400 kg in another major operation. By 29 June, the agency reported having seized approximately 1.08 tonnes of mercury on federal highways in Roraima since the beginning of 2026. In September, the PRF seized approximately 34 kg of mercury in Boa Vista, reportedly acquired in the border region with Guyana. The cumulative seizure total includes mercury whose precise origin has not been established. [14-17, 25]

EIA's investigations in Suriname provide a complementary perspective. Interviews described mercury being distributed through mining-supply businesses, gold-linked traders and smaller intermediaries, including to Brazilian purchasers. Investigative accounts also identified cross-border transport networks capable of serving different destination markets. Although not every reported route has been verified through completed mercury shipments, the findings highlight the flexibility of regional distribution networks and the challenges of maintaining visibility over subsequent transfers. [19]

Similar challenges emerged from EIA's investigations in West Africa. In Togo, EIA identified the Port of Lomé as a significant mercury trading and distribution hub, with sources interviewed by EIA describing onward movement to Ghana, Burkina Faso, Niger and other regional gold-mining markets. Documentation obtained by EIA also included a Togolese authorization for the import and onward transport of mercury from the UAE, via the Port of Lomé and the Cinkassé border crossing, to Ouagadougou, Burkina Faso, for mineral extraction activities. These findings illustrate how mercury passing through international trading hubs and wholesale networks can be redistributed across multiple jurisdictions, complicating efforts to establish its ultimate destination and use. [8, 26]

Commercial incentives reinforce the importance of downstream oversight. EIA investigations documented substantial differences in mercury prices across international and regional supply-chain stages. In August 2026, an international supplier in Asia quoted USD 385 per kg for a minimum one-tonne order, compared with approximately USD 565 per kg at the regional wholesale level in South America, a 47% difference. Further downstream, in an Amazonian gold-mining region, a standard 34.5 kg flask was quoted at approximately USD 779 per kg in October 2026, 38% above the earlier regional wholesale quotation, while smaller quantities were quoted at USD 960 per kg, a further 23% increase. Overall, the highest downstream quotation was approximately 149% above the international supplier quotation. Although these observations do not represent transactions along a single verified supply

chain and reflect different purchasing conditions, they illustrate the substantial commercial value mercury can command as it moves through distribution networks, reinforcing the importance of monitoring trade and resale beyond initial importation. [20]

Experience under other international environmental agreements reinforces the importance of maintaining controls throughout commercial supply chains. In its 2025 briefing Mercury: An Amazon Emergency, EIA drew on lessons from international ivory trade restrictions, particularly the challenges created when prohibited trade coexists with legal domestic markets and commercial distribution channels. Although the legal frameworks governing ivory and mercury differ, a relevant lesson is that effective restrictions require not only controls on international trade, but also mechanisms to prevent prohibited or unauthorized material from entering and circulating through legitimate markets. For mercury, this reinforces the importance of source verification, monitoring commercial stocks and transactions, and preventing diversion into illegal gold-mining supply chains. [29]

Together, the investigative and enforcement evidence demonstrates the importance of monitoring mercury beyond customs clearance. Practical measures include reconciling authorized imports with inventories and recorded sales; documenting wholesale transfers, subsequent distribution and exports; verifying significant discrepancies in stocks or declared uses; and strengthening information exchange between authorities in source, transit and destination countries. Such measures would build on existing national implementation efforts, including Guyana's planning framework, and strengthen efforts to prevent mercury diversion into illegal gold-mining economies.

4. Recommendations for the Secretariat's report

Based on these experiences, EIA offers five recommendations for consideration in preparing the report requested under decision MC-6/1.

1. **Strengthen intelligence exchange and risk-based customs enforcement.** Encourage timely sharing of intelligence on suspected mercury trafficking, including relevant shipping, commercial and laboratory information, among customs authorities, environmental regulators, police and prosecutors, subject to appropriate confidentiality safeguards. Support analytical capacity to identify recurring commercial networks, linked shipments and emerging concealment methods, alongside the technical capacity to safely inspect hazardous cargo. Relevant experience could also be drawn from UNEP OzonAction's Compliance Assistance Programme under the Montreal Protocol, particularly its approaches to institutional strengthening, customs training and regional enforcement cooperation. [30]
2. **Facilitate practical guidance on applying the definition of primary mercury mining.** Encourage consideration by Parties, through appropriate Convention processes, of guidance on interpreting and applying Article 2(i) where mercury is deliberately recovered and commercialized alongside other metals. Such guidance could identify relevant evidence, including mining plans, ore-selection priorities, recovery infrastructure, production decisions and commercial objectives, without treating any particular tonnage or revenue share as a

determinative legal threshold. It should also distinguish industrial by-product classifications from the Convention's *principal material sought* criterion.

3. **Strengthen original-source documentation and its continuity through re-export.** Encourage Parties to document the original source of traded mercury, including the mine or recovery facility, the production process, and evidence supporting its classification under Article 3. Promote arrangements to preserve this information through subsequent international transfers and re-export, making it available to competent authorities for verification. Encourage cooperation between trading partners to investigate discrepancies in trade records and verify questionable source claims, drawing on relevant lessons from the Montreal Protocol.
4. **Support monitoring of mercury stocks and distribution after import.** Encourage Parties to strengthen practical systems for tracking mercury after customs release, including stock registers, licensing or registration of relevant traders, documentation of wholesale transfers and reconciliation of imports, inventories, sales, exports and declared end uses. Support risk-based verification of significant discrepancies and information exchange between authorities in neighboring countries where mercury may be diverted across borders. Such measures could build on existing national frameworks, including ASGM National Action Plans, to reduce diversion into illegal gold-mining supply chains.
5. **Support safe handling and environmentally sound management of seized mercury.** Help enforcement agencies access laboratory confirmation, trained hazardous-material personnel, documented chain-of-custody procedures, secure interim storage and appropriate arrangements for environmentally sound final management. Technical assistance and financing should address these needs as part of an effective enforcement response, including safeguards against seized mercury returning to unauthorized commercial circulation.

These recommendations are intended to support practical implementation, prevent mercury diversion into ASGM and inform further consideration by Parties of commercially recovered mercury. They do not prejudge the legal classification of any particular operation or establish that an identified national customs offense constitutes non-compliance with Article 3.

Conclusion

EIA's investigations illustrate three distinct but interconnected challenges for effective mercury oversight: detecting mercury concealed or misdeclared in commercial cargo; determining how the Convention's definition of primary mercury mining applies to polymetallic operations in which mercury is deliberately recovered and commercialized; and maintaining visibility over mercury as it moves through domestic and cross-border distribution networks. Identifying the original production source is important, but does not, by itself, resolve how mercury should be classified under Article 2(i) or establish its ultimate destination and use.

EIA's investigative findings in the Americas and West Africa, together with enforcement actions by competent authorities, mining records and UNEP's supply assessments, point to practical opportunities for strengthening implementation. Greater clarity in applying the Convention's source-specific

provisions, improved continuity of source information, stronger oversight of downstream distribution and sustained cross-border cooperation could help Parties address vulnerabilities at different stages of international mercury trade. EIA hopes these findings and recommendations will contribute to the Secretariat's report under decision MC-6/1 and inform consideration by COP-7.

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