INDONESIA'S EXPERIENCES IN PREVENTING AND COMBATTING THE ILLEGAL TRADE OF MERCURY

1. Policy Framework and the Bali Declaration

Indonesia recognizes that illegal trade in mercury poses a serious threat to human health and the environment, driven largely by continued demand from Artisanal and Small-Scale Gold Mining (ASGM). As part of its commitment to the Minamata Convention, Indonesia initiated the Bali Declaration on Combatting Global Illegal Trade of Mercury, which was launched at the fourth meeting of the Conference of the Parties (COP-4) in Bali in March 2022. The Declaration calls for stronger international cooperation, practical tools for monitoring and information sharing, and the exchange of experience among Parties. Indonesia submits the following information in that spirit, and in response to paragraphs 4 and 5 of decision MC-6/1.

At the national level, Presidential Regulation No. 21 of 2019 on the National Action Plan (NAP) for the Reduction and Elimination of Mercury (RAN-PPM) provides a strong policy framework. It covers the inventory and mapping of mercury sources, the monitoring and control of mercury supply and distribution, the monitoring of domestic trade, and measures to address ASGM and illegal mercury trade. The use of mercury in ASGM is prohibited under Regulation No. 07 of 2022 on the Distribution and Supervision of Hazardous Substances.

2. Enforcement Experience

a. Seizure of Illegal Cinnabar

The Government of Indonesia has seized mercury originating from illegal cinnabar mining operations, as well as mercury from non-reusable sources, which is intended for management as hazardous waste. This includes, inter alia, the confiscation of 333 tonnes of cinnabar ore, reflecting the authorities' ongoing commitment to regulatory enforcement and environmental protection.

b. ASGM Management in 2023–2025

From 2023 to 2025, Indonesia continued its efforts to formalize and manage Artisanal and Small-Scale Gold Mining (ASGM) activities, including through the designation of People's Mining Areas (WPR) and the issuance of People's Mining Permits (IPR). As of 2025, a total of 1,216 WPR blocks had been designated across 20 provinces, with 15 IPRs

issued in five provinces. The management requirements for WPR also include a prohibition on the use of mercury in gold processing and refining activities.

c. Enforcement Against Illegal Mining Activities

Indonesia has established a Task Force for Forest Area Enforcement (Satuan Tugas Penertiban Kawasan Hutan or Satgas PKH) pursuant to Presidential Regulation No. 5/2025. In 2025, enforcement efforts under this initiative resulted in action being taken against 12 cases of illegal gold mining within forest areas. This initiative forms part of Indonesia's broader efforts to strengthen oversight and law enforcement against illegal mining activities, including preventing the potential use of mercury in illegal gold processing operations.

d. Use of Forms Related to Article 3 on Mercury Trade

With regard to the use of Forms Related to Article 3 on Mercury Trade under the Minamata Convention, Indonesia has no experience in using these forms, as there have been no mercury import or export activities in the country to date.

3. Lessons Learned

a. Strengthening Coordination on the Handling of Mercury

During the 2023–2025 period, the Indonesian National Police recorded 23 criminal cases related to ASGM activities and/or the illegal trade of mercury across several regions of Indonesia. These cases involved the transportation, storage, and sale of mercury without permits. This highlights the importance of strengthening coordination among relevant government institutions in addressing mercury-related violations.

b. Integrating ASGM Formalization with Mercury Control

Indonesia has designated WPRs and issued IPRs as part of its efforts to formalize ASGM activities. The requirements for issuing WPRs also prohibit the use of mercury in gold processing and refining. This shows that formalizing ASGM must be accompanied by monitoring and enforcement.

4. Challenges

Indonesia continues to face several challenges in combatting illegal mercury trade and ensuring the proper management of seized mercury, including:

a. Limited coordination between the national and sub-national levels and information sharing among relevant agencies, particularly in monitoring illegal mercury trade, conducting enforcement actions, and ensuring appropriate follow-up on seized mercury.
b. Limited technical capacity and resources, particularly at the sub-national level, for the identification, safe handling, packaging, transportation, and storage of seized mercury.
c. Limited availability of appropriate facilities and technologies for the safe storage and environmentally sound final management of seized mercury, to prevent its re-entry into circulation and minimize potential risks to human health and the environment.
d. Lack of policies and regulations among relevant agencies for the handling and storage of seized mercury.

5. Cooperation

These challenges cannot be fully addressed through national efforts alone. Indonesia would welcome international support, including from the Global Environment Facility, the Specific International Programme, and relevant partner organizations referred to in paragraph 9 of decision MC-6/1, in four priority areas:

a. strengthening policies and regulations for law enforcement and customs officers;
b. capacity building for law enforcement and customs officers, particularly at the sub-national level, on the identification, handling, packaging, and safe storage of seized mercury;
c. technical assistance and technology transfer for the standardized storage and environmentally sound final management of seized mercury; and
d. support for sustained, coordinated monitoring and enforcement operations in areas vulnerable to illegal mercury trade.