Call for Information on Supply Sources and Trade

Emerging evidence from GEF Project ID 11047 – *Accelerate Minamata Convention compliance through improved understanding and control of mercury trade in Latin America*

1. Introduction and scope of the contribution

This submission provides emerging information from the GEF-funded regional project *"Accelerate Minamata Convention compliance through improved understanding and control of mercury trade in Latin America"* (GEF ID 11047), implemented by UNEP and executed by the Basel Convention Coordinating Centre, Stockholm Convention Regional Centre, for Latin America and the Caribbean (BCCC-SCRC), with participation from Bolivia (Plurinational State of), Colombia, Ecuador, Honduras, Mexico and Peru.

The contribution responds to the Minamata Convention Secretariat's Call for Information on Supply Sources and Trade, particularly its request for experiences from ongoing GEF projects concerning prevention and control of illegal mercury trade and implementation of Article 3.

The project became operational in November 2024 and held its regional inception workshop in March 2025. Technical assessments of mercury supply, trade routes, legal frameworks and control mechanisms remain under development. Accordingly, this submission distinguishes between information already documented, issues currently under investigation, and information gaps that the project is expected to address during its remaining implementation period.

The information presented below reflects the evidence available to the project as of June 2026. Where assessments are still under development, the information is presented as preliminary and subject to updating as the implementation of the project progresses.

2. Scope and current understanding of mercury supply and trade in LAC

Known. Available information reviewed under the project indicates a continuing discrepancy between declining officially reported mercury trade and evidence of continued mercury use in the region, particularly in artisanal and small-scale gold mining (ASGM). This discrepancy constitutes an important starting point for examining mercury flows that may not be captured through official supply-chain information. The project has begun compiling and systematizing information on mercury production, trade and distribution flows and mapping institutions responsible for mercury regulation, customs control and environmental management. Existing legislation, previous national studies and available statistics are also being reviewed.

Under investigation. These national baselines are being used to analyze mercury trade dynamics and identify legal and potentially illegal supply routes at national and regional levels, without assuming that a potential route represents an illegal flow until supported by additional

evidence. The project is also assessing the relationship between supply sources, imports, domestic distribution and mercury demand, particularly in ASGM sector. **Information gap.** At this stage, the project does not yet have a consolidated regional estimate of the volume of informal or illegal mercury trade, nor a fully validated regional mapping of supply, transit and destination routes. These are expected outputs of the ongoing technical work.

3. Informal and illegal mercury flows in LAC

The strongest quantitative evidence currently documented through the project comes from Mexico.

Known – Mexico. A report prepared within the project framework documented several cases of illicit mercury trafficking involving the seizure of a combined 15.7 tons of mercury. This quantity has been reported in the project's 2026 PIR as materialized progress against GEF Core Indicator 9.2 on mercury reduction. For the purposes of this submission, the 15.7 tons should be understood as documented seizures associated with illicit trafficking cases and not as an estimate of the total volume of illegal mercury trade in Mexico or the region. The documented cases demonstrate that illicit mercury movements can involve significant quantities and highlight the importance of strengthening understanding of supply sources, intermediaries, transport routes and end users. **Known –** Colombia. A further example concerns the seizure of more than 1.3 tons of mercury in Cartagena, Colombia. The case highlighted an additional challenge beyond detection of illegal trade: the safe storage and environmentally sound management of mercury once confiscated. Technical discussions were held with the Ministry of Environment, the National Directorate of Taxes and Customs (DIAN), the Colombian Geological Survey and specialized waste-management organizations to identify coordinated solutions. These discussions highlighted the need to clarify institutional responsibilities and strengthen technical arrangements for the secure custody, storage and environmentally sound management of confiscated mercury. **Under investigation.** The project is examining whether documented national cases and available trade information can help identify broader patterns of potential origin, transit and destination across participating countries.

Information gap. Current evidence does not yet support a comprehensive quantification of illegal mercury trade across the six countries or definitive conclusions regarding all transboundary routes. The ongoing national and regional assessments are intended to address these limitations.

4. Domestic distribution, traceability and end use

Known. Preliminary assessments have identified weaknesses in traceability and information sharing within existing mercury-management systems. In particular, the project has identified a need to improve information exchange and coordination among databases and information systems managed by environmental, customs and enforcement authorities. This is particularly relevant because border controls provide only part of the information needed to understand mercury flows. Tracking mercury after entry into a country including distribution, storage,

transfer and eventual end use is necessary to determine whether legally imported mercury may subsequently be diverted to unauthorized or informal activities. This information is also important for distinguishing authorized domestic supply chains from potential diversion into unauthorized uses. **Under investigation.** Participating countries are reviewing mercury production, import, export, transport, storage and distribution systems and identifying institutional and regulatory gaps affecting traceability. ASGM is an important consideration because it represents a major mercury-use sector in the region.

Information gap. The project has not yet established complete mercury traceability systems across the participating countries. The degree to which legally imported mercury can currently be followed through domestic supply chains therefore remains under assessment.

5. Institutional coordination and implementation of Article 3

Known. Mercury control responsibilities are distributed among multiple institutions. The project has therefore prioritized coordination among environmental authorities, customs administrations, mining agencies, prosecutors and other enforcement bodies. National Coordination Mechanisms are intended to provide institutional platforms for sustained cooperation among relevant authorities. As of June 2026, coordination mechanisms progressed at different rates across the participating countries. For example, Colombia had consolidated its National Coordination Mechanism under the Ministry of Environment; Peru had established its mechanism involving MINAM, MINEM, SUNAT, the police and other relevant institutions; and Honduras was integrating the mechanism within its existing national chemicals-management structure. These examples illustrate different institutional approaches to national coordination rather than a uniform regional model. The project is also reviewing national legal and regulatory frameworks governing mercury production, import, export, transport and storage and is designed to support the drafting or adaptation of provisions controlling import, export and internal transfers in accordance with Article 3. **Under investigation.** The assessments examine national regulatory gaps, institutional responsibilities and operational procedures required for effective implementation and enforcement of Article 3. **Important information gap.** Detailed evidence concerning the practical implementation of Article 3 consent forms, including difficulties encountered in issuing, receiving or verifying the forms between trading countries, remains limited in the information collected by the project to date. Additional information from national authorities in this area would help strengthen the evidence base and inform the project's ongoing assesment.**6. Regional and transboundary cooperation**

Known. Participating countries have established regional coordination arrangements to exchange experiences, implementation challenges and approaches to mercury trade monitoring and enforcement. National teams have shared implementation challenges and practical approaches, creating professional networks among institutions responsible for mercury management.

For Bolivia, Colombia, Ecuador and Peru, the project also builds upon cooperation through the Andean Community and its Andean Mercury Observatory, which provides an existing platform that can support information exchange and future regional monitoring of mercury flows. **Under investigation.** As national mercury-flow assessments advance, the project intends to compare findings across countries to identify possible connections among supply sources, transit countries and destinations and to support the development of coordinated regional responses.

Information gap. Validated transboundary routes and the relative importance of different source, transit and destination countries have not yet been established through the project.

7. Key emerging findings, information gaps and limitations

At this stage of implementation, the available evidence points to several emerging findings:

- **Illegal mercury trade is documented, but its overall scale remains uncertain.** The seizures documented in Mexico and Colombia provide concrete evidence of illicit mercury movements. However, these cases cannot yet be extrapolated to estimate the overall scale of illegal mercury trade at the national or regional level. **Official trade statistics provide only a partial picture of mercury flows.** Customs and trade data need to be complemented with environmental, mining, enforcement and end-use information to better understand mercury flows and potential discrepancies between reported trade and mercury use, particularly in ASGM.
- **Domestic traceability remains a critical information gap.** Information on the movement, storage, transfer and end use of mercury after legal importation is limited. Strengthening traceability would help distinguish authorized domestic supply chains from potential diversion into informal or illegal channels.
- **Institutional fragmentation can limit effective control.** Improved interoperability among customs, environmental and enforcement information systems has already been identified as a priority. **Article 3 implementation requires further documentation.** More country-specific evidence is needed regarding the practical application of trade consent procedures and documentation.

Regional conclusions remain preliminary. Baseline studies and analyses of legal and illegal trade routes are ongoing, and current information should therefore not be interpreted as a comprehensive regional assessment. Implementation delays associated with cooperation agreements, institutional transitions, administrative processes and differences in national readiness have also affected the pace at which this evidence could be generated and consolidated. Field assessments in some remote ASGM areas have faced additional accessibility and security constraints.

8. Next steps and expected contribution to Article 3 implementation

During the remaining implementation period, GEF ID 11047 will deepen the national and regional assessments of mercury supply sources, domestic distribution, legal and illegal trade routes, regulatory frameworks and control mechanisms.

The project is expected to generate:

- comparable national mercury-flow profiles and a regional comparative analysis;
- identification and assessment of potential legal and illegal trade flows and routes, where supported by evidence;
- recommendations for strengthening national regulatory and institutional frameworks;
- strengthened mercury traceability and information-sharing mechanisms;
- capacity building for customs, border-control and other competent authorities together with UNODC and Interpol as project partners;
- improved regional information exchange; and
- additional evidence concerning implementation of Article 3, including trade-control procedures.