2025 FULL REPORTS OF THE MINAMATA CONVENTION ON MERCURY

Report submitted on 28 July 2025

MINAMATA CONVENTION ON MERCURY

REPORTING PERIOD:
1 January 2021 to 31 December 2024

UNOFFICIAL ENGLISH TRANSLATION

DISCLAIMER

This is a secretariat version translation of the submitted report by the Party. The text has not been officially translated and edited, and is provided for information purposes. In case of any error or omission in the translation, the original submission prevails.

▼ INFORMATION ON THE PARTY

1. Information on the party

Name of party
Comoros

Date on which its instrument of ratification, accession, approval or acceptance was deposited
July 23, 2019

Date of entry into force of the Convention for the party
October 21, 2019

2. Information on the national focal point

Full name of the institution
Directorate General for the Environment and Forestry

Title of Contact Officer
Mom

Name of Contact Officer
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3. Information about the contact officer submitting the reporting format if different from the above

Focal Point is submitting the national report

- (●) Information is submitted by the national focal point
- ( ) Information is submitted through the national focal point by the contact officer

▼ ART. 3: MERCURY SUPPLY SOURCES AND TRADE

3.1: Does the party have any primary mercury mines that were operating within its territory at the date of entry into force of the Convention for the party?

- ○ Yes – primary mercury mining with available data
- ○ Yes – primary mercury mining with no available data
- ◉ No

3.2: Does the party have any primary mercury mines that are now in operation that were not in operation at the time of entry into force of the Convention for the party?

- ○ Yes – primary mercury mining with available data
- ○ Yes – primary mercury mining with no available data
- ◉ No

3.3: (A) Has the party endeavoured to identify individual stocks of mercury or mercury compounds exceeding 50 metric tons that are located within its territory?

3.3: (A) Has the party endeavoured to identify individual stocks of mercury or mercury compounds exceeding 50 metric tons that are located within its territory?

- ○ Yes – with new data* (also to be selected by parties reporting for the first time)
- ○ Yes – endeavoured and indicates same stocks as reported in the previous report
- ◉ No

If the party answered no to the question, please explain.
Since the inventories carried out by the MIA, no new inventories have been conducted.
However, as part of the ISLANDS project, an inventory of hazardous chemical products and waste, including those containing added mercury, is planned for May.
It should be noted that the Comoros do not have any gold mines.

3.3: (B) Has the party endeavoured to identify individual sources of mercury-supply-generating stocks exceeding 10 metric tons per year that are located within its territory?

3.3:(B) Has the party endeavoured to identify individual sources of mercury-supply-generating stocks exceeding 10 metric tons per year that are located within its territory?

- ○ Yes – with new data* (also to be selected by parties reporting for the first time)
- ○ Yes – endeavoured and indicates same stocks as reported in the previous report
- ◉ No

If the party answered no to the question, please explain.
Since the inventories carried out by the MIA, no new inventories have been conducted.
However, as part of the ISLANDS project, an inventory of hazardous chemical products and waste, including those containing added mercury, is planned for May.
It should be noted that the Comoros do not have any gold mines.

3.4: Has the party determined that it has excess mercury available from the decommissioning of chlor-alkali facilities?

- ○ Yes
- ◉ No – has determined it has no excess mercury
- ○ No – has not made a determination

3.5: *Has the party received consent, or relied on a general notification of consent, in accordance with article 3, including any required certification from importing non-parties, for all exports of mercury from

the party's territory in the reporting period?

- [ ] Yes - exports to parties
- [ ] Yes - exports to non-parties
- [x] No - no export took place
- [ ] No - consent was not given

3.6: Has the party allowed the import of mercury from a non-party?

- (●) No
- ( ) Yes
- ( ) The importing party has relied on paragraph 7 of article 3

Part E - Additional comments on this article

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▼ ART. 4: MERCURY-ADDED PRODUCTS

4.1. Has the party taken any appropriate measures to not allow the manufacture, import or export of mercury-added products listed in Part I of Annex A of the Convention after the phase-out date specified for those products?

- (●) Yes
- ( ) No
- ( ) Yes (implementing paragraph 2 of article 4)

If yes, please provide information on the measures.
The Comoros have recently updated and promulgated the framework law relating to the environment, and implementing texts relating to the prohibition of the manufacture and use of products containing added mercury are being drawn up.

If yes, has the party registered for an exemption pursuant to article 6?

- ( ) Yes
- (●) No

4.3: (A) Has the party taken two or more measures listed in subparagraphs (i) to (ix) of part II of annex A for the mercury-added products listed in part II of annex A in accordance with the provisions set out therein?

4.3:(A) Has the party taken two or more measures listed in subparagraphs (i) to (ix) of part II of annex A for the mercury-added products listed in part II of annex A in accordance with the provisions set out therein?

- ( ) Yes
- (●) No

If the party answered no to question 4.3(A) above, please explain
The Comoros have recently updated and promulgated the framework law relating to the environment, and implementing texts relating to the prohibition of the manufacture and use of products containing added mercury are being drawn up.

4.3: (B) If the amendment to annex A adopted in decision MC-4/3 has entered into force for the party, has the party (please check the

appropriate box below) taken relevant measures:

4.3:(B) If the amendment to annex A adopted in decision MC-4/3 has entered into force for the party, has the party (please check the appropriate box below) taken relevant measures:

- ○ Yes
- ◉ No
- ○ Not applicable

If the party answered no to question 4.3(B) above, please explain
We are currently drafting the implementing texts relating to the prohibition and sanctions. However, confirmation regarding the incorporation of the amendment in Annex A, adopted by decision MC-4/3, has not yet been obtained.

4.4: Has the party taken measures to prevent the incorporation into assembled products of mercury-added products whose manufacture, import and export are not allowed for it under article 4?

- ◉ Yes
- ○ No
- ○ No - not applicable (do not have facilities assembling products using mercury-added products)

If yes, please provide information on the measures.
The Comoros have recently updated and promulgated the framework law relating to the environment, and implementing texts relating to the prohibition of the manufacture and use of products containing added mercury are being drawn up.

4.5: Has the party discouraged the manufacture and the distribution in commerce of mercury-added products not covered by any known use in accordance with article 4, paragraph 6?

- ◉ Yes
- ○ No - no action taken
- ○ No - an assessment of the risks and benefits of the product demonstrates benefits to human health or the environment

If yes, please provide information on the measures.
The Comoros have recently updated and promulgated the framework law relating to the environment, and implementing texts relating to the prohibition of the manufacture and use of products containing added mercury are being drawn up.

Part E - Additional comments on this article

By the end of the year, the Union of the Comoros will have put in place a legal instrument prohibiting the import, export and marketing of products containing added mercury.

▼ ART. 5: MANUFACTURING PROCESSES IN WHICH MERCURY OR MERCURY COMPOUNDS ARE USED

5.1: Are there facilities within the territory of the party that use mercury or mercury compounds for the processes listed in Annex B of the Minamata Convention in accordance with paragraph 5 of article 5 of the Convention?

- ○ Yes
- ◉ No
- ○ Do not know

5.2: Are measures in place to not allow the use of mercury or mercury compounds in manufacturing processes listed in Part I of Annex B after the phase-out date specified in that Annex for the individual process?

CHLOR-ALKALI PRODUCTION

- ○ Yes
- ○ No
- ◉ Not applicable (do not have these facilities)

ACETALDEHYDE PRODUCTION IN WHICH MERCURY OR MERCURY COMPOUNDS ARE USED AS A CATALYST

- ○ Yes
- ○ No
- ◉ Not applicable (do not have these facilities)

5.3: Are measures in place to restrict the use of mercury or mercury compounds in the processes listed in Part II of Annex B in accordance with the provisions set out therein?

VINYL CHLORIDE MONOMER PRODUCTION

- ○ Yes
- ○ No
- ◉ Not applicable (do not have these facilities)

SODIUM OR POTASSIUM METHYLATE OR ETHYLATE

- ○ Yes
- ○ No
- ◉ Not applicable (do not have these facilities)

PRODUCTION OF POLYURETHANE USING MERCURY-CONTAINING CATALYSTS

- ○ Yes
- ○ No
- ◉ Not applicable (do not have these facilities)

5.4: Is there any use of mercury or mercury compounds in a facility using the manufacturing processes listed in Annex B that did not exist prior to the date of entry into force of the Convention for the party?

- ○ Yes
- ◉ No

5.5: Has the party discouraged the development of any facility using any other manufacturing process in which mercury or mercury compounds are intentionally used that did not exist prior to the date of entry into force of the Convention?

- ○ Yes
- ○ No - no action taken
- ◉ No - the party demonstrated to the Conference of the Parties the significant environmental and health benefits of the manufacturing process and that there are no technically and economically feasible mercury-free alternatives available providing such benefits.

Part E - Additional comments on this article

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▼ ART. 7: ARTISANAL AND SMALL-SCALE GOLD MINING

7.1: Have steps been taken to reduce, and where feasible eliminate, the use of mercury and mercury compounds in, and the emissions and releases to the environment of mercury from, artisanal and small-scale gold mining and processing subject to article 7 within your territory?

- ○ Yes
- ○ No
- ◉ There is no artisanal and small-scale gold mining and processing subject to article 7 in which mercury amalgamation is used in the territory

7.2: Has the party determined, and notified the secretariat, that artisanal and small-scale gold mining and processing within its territory is more than insignificant?

- ○ Yes
- ◉ No

7.5: Supplemental: Has the party cooperated with other countries or relevant intergovernmental organizations or other entities to achieve the objective of this article?

- ○ Yes
- ◉ No

Please provide information

{Empty}

Part E - Additional comments on this article

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▼ ART. 8: EMISSIONS

8.1: Identify any Annex D source categories for which there are new sources of emissions of mercury or mercury compounds as defined in paragraph 2 (c) of article 8.

For each of those source categories describe the measures in place, including the effectiveness of such measures, to implement the requirements of paragraph 4 of article 8.

- ☐ Coal-fired power plants

- [ ] Coal-fired industrial boilers
- [ ] Smelting and roasting processes used in the production of non-ferrous metals
- [x] Waste incineration facilities

Waste incineration facilities
In the Union of the Comoros, there are no landfills that meet standards; waste is stored in illegal dumps and often burned in the open air.

- [ ] Cement clinker production facilities

Has the party required the use of best available techniques or best environmental practices (BAT/BEP) to control and where feasible reduce emissions for new sources no later than 5 years after the date of entry into force of the Convention for the party?

- (•) Yes
- ( ) No (please explain)

If Yes, please explain
the promulgation of the framework law on the environment

8.2: Identify any Annex D source categories for which there are existing sources of emissions of mercury or mercury compounds as defined in paragraph 2 (e) of article 8.

For each of those source categories, select and provide details on the measures implemented under paragraph 5 of article 8 and explain the progress that these applied measures have achieved in reducing emissions over time in your territory:

▼ COAL-FIRED POWER PLANTS

- [ ] A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Use of BAT/BEP to control emissions from relevant sources
- [ ] Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- [ ] Alternative measures to reduce emissions from relevant sources

Measures
{Empty}

Progress
{Empty}

▼ COAL-FIRED INDUSTRIAL BOILERS

- [ ] A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Use of BAT/BEP to control emissions from relevant sources
- [ ] Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- [ ] Alternative measures to reduce emissions from relevant sources

Measures
{Empty}

Progress
{Empty}

▼ SMELTING AND ROASTING PROCESSES USED IN THE PRODUCTION OF NON-FERROUS METALS

- [ ] A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Use of BAT/BEP to control emissions from relevant sources
- [ ] Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- [ ] Alternative measures to reduce emissions from relevant sources

Measures
{Empty}

Progress
{Empty}

▼ WASTE INCINERATION FACILITIES

- [ ] A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Use of BAT/BEP to control emissions from relevant sources
- [ ] Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- [ ] Alternative measures to reduce emissions from relevant sources

Measures
{Empty}

Progress
{Empty}

▼ CEMENT CLINKER PRODUCTION FACILITIES

- [ ] A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- [ ] Use of BAT/BEP to control emissions from relevant sources
- [ ] Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions

☐ Alternative measures to reduce emissions from relevant sources

Measures
{Empty}

Progress
{Empty}

Have the measures for existing sources under paragraph 5 of article 8 been implemented no later than 10 years after the date of entry into force of the Convention for the party?

○ Yes

◉ No

Please explain
Since the implementation of the MIA, no concrete measures have been taken to date. However, the ISLAND project plans to implement actions aimed at reducing emissions from mercury-containing products.

8.3: Has the party prepared an inventory of emissions from relevant sources within 5 years of entry into force of the Convention for it?

○ Yes

○ No

◉ Have not been a party for 5 years

8.4: Has the party chosen to establish criteria to identify relevant sources covered within a source category?

○ Yes

◉ No

8.5: Has the party chosen to prepare a national plan setting out the measures to be taken to control emissions from relevant sources and its expected targets, goals and outcomes?

○ Yes

◉ No

Part E - Additional comments on this article

{Empty}

▼ ART. 9: RELEASES

9.1: Are there, within the party's territory, relevant sources of releases as defined in paragraph 2 (b) of article 9?

○ Yes

◉ No

○ Do not know (please explain)

9.2: Has the party established an inventory of releases from relevant sources within 5 years of entry into force of the convention for it?

○ Yes

○ Relevant sources do not exist in the territory

◉ Have not been a party for 5 years

No (please explain)

Part E - Additional comments on this article

{Empty}

▼ ART. 10: ENVIRONMENTALLY SOUND INTERIM STORAGE OF MERCURY, OTHER THAN WASTE MERCURY

10.1: Has the party taken measures to ensure that the interim storage of non-waste mercury and mercury compounds intended for a use allowed to a party under the Convention is undertaken in an environmentally sound manner?

Yes

No (please explain)

Do not know (please explain)

If yes, please indicate the measures taken to ensure that such interim storage is undertaken in an environmentally sound manner, and the effectiveness of those measures.
As part of the ISLAND project, plans are in place to build a facility for the storage of hazardous chemical products and waste, including those containing mercury, for export to countries capable of managing them in an environmentally sound and rational manner.

Part E - Additional comments on this article

{Empty}

▼ ART. 11: MERCURY WASTES

11.1: Have measures outlined in article 11, paragraph 3, been implemented for the party's mercury waste?

Yes

No

Yes - the party has taken measures so that mercury waste is managed in an environmentally sound manner

Yes - the party has taken measures so that mercury waste is recovered, recycled, reclaimed or directly re-used for a use allowed to a party under the Convention or for environmentally sound disposal pursuant to paragraph 3 (a)

Yes - the party has taken measures so that mercury waste is not transported across international boundaries except for the purpose of environmentally sound disposal

Please describe measure and effectiveness of measures
As part of the ISLAND project, plans are in place to build a facility for the storage of hazardous chemical products and waste, including those containing mercury, for export to countries capable of managing them in an environmentally sound and rational manner.

If the party answered yes to any measures above, please describe the measures implemented pursuant to paragraph 3, and please also describe the effectiveness of those measures.
As part of the ISLAND project, plans are in place to build a facility for the storage of hazardous chemical products and waste, including those containing mercury, for export to countries capable of managing them in an environmentally sound and rational manner.

11.2: *Are there facilities for final disposal of waste consisting of

mercury or mercury compounds in the party's territory?

- Yes
- No
- Do not know (please explain)

Part E - Additional comments on this article

{Empty}

▼ ART. 12: CONTAMINATED SITES

12.1: Has the party endeavoured to develop strategies for identifying and assessing sites contaminated by mercury or mercury compounds in its territory?

- Yes
- No

Please elaborate
Inventories are currently being carried out as part of the ISLAND project.

Part E - Additional comments on this article

{Empty}

▼ ART. 13: FINANCIAL RESOURCES AND MECHANISM

13.1: Has the party undertaken to provide, within its capabilities, resources in respect of those national activities that are intended to implement the Convention in accordance with its national policies, priorities, plans and programmes?

- Yes
- No

Please specify
lack of funding

13.2: Supplemental: Has the party, within its capabilities, contributed to the mechanism referred to in paragraph 5 of article 13?

- Yes
- No

Please provide comments, if any.
The Comoros is one of the small island developing states

13.3: Supplemental: Has the party provided financial resources to assist developing-country parties and/or parties with economies in transition in the implementation of the Convention through other bilateral, regional and multilateral sources or channels?

- Yes
- No

Please specify
The Comoros is one of the small island developing states

Please provide comments, if any.
The Comoros is one of the small island developing states

Part E - Additional comments on this article

{Empty}

▼ ART. 14: CAPACITY-BUILDING, TECHNICAL ASSISTANCE AND TECHNOLOGY TRANSFER

14.1: Has the party cooperated to provide capacity-building or technical assistance, pursuant to article 14, to another party to the Convention?

- ○ Yes
- ◉ No

Please specify

The Comoros are among the least developed countries and small island developing states

14.2: Supplemental: Has the party received capacity-building or technical assistance pursuant to article 14?

- ○ Yes
- ◉ No

Please specify
To date, the Comoros have never benefited from capacity building nor provided technical assistance to another Party to the Convention.

Please provide comments, if any.
{Empty}

14.3: Has the party promoted and facilitated the development, transfer and diffusion of and access to, up-to-date environmentally sound alternative technologies?

- ○ Yes
- ◉ No
- ○ Other

Please specify
The Party has not yet established specific mechanisms to encourage or facilitate the development, transfer, or dissemination of environmentally sound alternative technologies. This situation is mainly due to technical, institutional, and financial constraints, as well as the lack of structured partnerships with institutions or Parties possessing such technologies.

Part E - Additional comments on this article

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▼ ART. 16: HEALTH ASPECTS

16.1: Have measures been taken to provide information to the public on exposure to mercury in accordance with paragraph 1 of article 16?

- ○ Yes
- ◉ No

16.2: Have any measures been taken to protect human health in accordance with article 16 beyond the provision of information to the public on exposure to mercury (referred to in question 16.1)?

- Yes
- No

Part E - Additional comments on this article

{Empty}

▼ ART. 17: INFORMATION EXCHANGE

17.1: Has the party facilitated the exchange of information referred to in article 17, paragraph 1?

- Yes
- No

Part E - Additional comments on this article

However, the Comoros are currently conducting an inventory of products containing added mercury.

▼ ART. 18: PUBLIC INFORMATION, AWARENESS AND EDUCATION

18.1: Have measures been taken to promote and facilitate the provision to the public of the kinds of information listed in article 18, paragraph 1?

- Yes
- No

(Art. 18 (1) (a) and (b))

Part E - Additional comments on this article

{Empty}

▼ ART. 19: RESEARCH, DEVELOPMENT AND MONITORING

19.1: Has the party undertaken any research, development and monitoring in accordance with paragraph 1 of article 19?

- Yes
- No

(Art. 19 (1) (a)-(g))

Part E - Additional comments on this article

{Empty}

▼ COMMENTS REGARDING POSSIBLE CHALLENGES IN MEETING THE OBJECTIVES OF THE CONVENTION

Part C: Comments regarding possible challenges in meeting the objectives of the Convention

{Empty}

▼ COMMENTS REGARDING THE REPORTING FORMAT AND POSSIBLE IMPROVEMENTS, IF ANY

Comments regarding the reporting format and possible improvements, if any

{Empty}

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