

# 2025 FULL REPORTS OF THE MINAMATA CONVENTION ON MERCURY

Report submitted on 23 December 2025



## REPORTING PERIOD:

1 January 2021 to 31 December 2024

### ▼ INFORMATION ON THE PARTY

#### 1. Information on the party

**Name of party**

Portugal

**Date on which its instrument of ratification, accession, approval or acceptance was deposited**

28 August 2018

**Date of entry into force of the Convention for the party**

26 November 2018

#### 2. Information on the national focal point

**Full name of the institution**

Portuguese Environment Agency

**Title of Contact Officer**

Ms.

**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 there are no mercury mines in Portugal, and our industry has decommissioned the use of mercury a long time ago, following the publication of the BAT Reference Documents, we saw no need to identify stocks of mercury exceeding 50 metric tons and sources of mercury supply generating stocks exceeding 10 metric tons per year.

**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.**

Portugal doesn't have any sources of mercury supply.

**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
- 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

Portugal didn't need to import mercury.

#### ▼ 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.

Portugal, as an EU member state, has European legislation with phased-out dates for all products listed in Part I of Annex A (Regulation (EU) 2017/852 of the European Parliament and the Council of 17 May 2017. Since the manufacture, import, or export of mercury-added products has been phased out in Europe a long time ago, Portugal took the appropriate measures at that time. Regulation EU 2017/852 is much more restrictive than the Convention.

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 yes, please provide information on the measures.

In Portugal, dentists have been using mercury-free alternatives for dental restoration for a long time. Additionally, Portugal has set out a dental amalgam phase-out in June 2020, in accordance with Article 10 Regulation EU 2017/852.

### 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 yes please select from the bellow checkboxes

- Excluded or not allowed, by taking measures as appropriate, the use of mercury in bulk form by dental practitioners
- Excluded or not allowed, by taking measures as appropriate, or recommended against, the use of dental amalgam for the dental treatment of deciduous teeth of patients under 15 years of age and of pregnant and breastfeeding women, except when such use is considered necessary by the dental practitioner based on the needs of the patient

If the party answered yes to either option above, please provide information on the measures.

According to European mercury legislation, it is forbidden:

- The use of dental amalgam other than in the form of pre-dosed capsules;
- The use of bulk mercury;
- The use of dental amalgam for dental treatments of deciduous teeth, children under 15 years of age, and pregnant or breastfeeding women, unless considered strictly necessary by a dentist, stomatologist, or dentist.

**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)

**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 manufacture and distribution of mercury-added products in commerce have been forbidden at the EU level. (Regulation 2017/852, REACH Regulation, etc).

**Part E – Additional comments on this article**

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▼ 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**

An installation that uses mercury would never be permitted if other economically viable alternatives were available.

#### **▼ 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
- Waste incineration facilities
- 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)

**No (please explain)**

Portugal has no new sources (as defined in paragraph 2 (c) of article 8)

## **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**

Portugal had 3 Coal-fired power plants: Carregado, Sines, and Pego. The Carregado power plant closed in 2010, the Sines power plant in January 2021, and the Pego power plant in November 2021.

#### **Progress**

These power plants were shut down as a measure to reduce air pollution and prevent CO2 emissions.

### **▼ 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**

All our waste incineration facilities, except one, are IPPC facilities and, as such, must comply with the Associated Emission Values (AEV) established in the BREF Documents. Our only waste incineration facility that is not covered by IPPC (Recauchutagem Nortenha) is covered by chapter IV of the Industrial Emissions Directive (Directive 2010/75/EU) and by chapter IV of our national legislation that transposes Directive 2010/75/EU ("Decreto-Lei n.º 127/2013")

**Progress**

Since the first IPPC Directive (Directive 96/61/EC) and its transposition into national law (Decreto-Lei n.º 194/2000), air emissions, and subsequently mercury air emissions had a huge reduction.

▼ **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

Our cement clinker production facilities are IPPC facilities and, as such, comply with the Associated Emission Values (AEV) established in the BREF Documents.

#### Progress

Since the first IPPC Directive (Directive 96/61/EC) and its transposition into national law (Decreto-Lei n.º 194/2000), air emissions, and subsequently mercury air emissions had a huge reduction.

**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

**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

**If yes, when was the inventory last updated?**

31 December 2023

**Please indicate where this inventory is available**

<https://industry.eea.europa.eu/analyse/pollutant-and-sector>

**Attach**

{Empty}

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

- Yes
- No

**If yes, please explain how the criteria for any category include at least 75 percent of the emissions from that category and explain how the party took into account guidance adopted by the Conference of the Parties.**

The identification of the relevant sources follows our National and European legislation, namely the Industrial Emissions Directive (Directive 2010/75/EU) and its transposition into national law ("Decreto-Lei n.º 127/2013)

**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

Portugal does not have its own national plan, it follows national and EU legislation, including legislation on industrial emissions.

### ▼ 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 no, please explain

Portugal does not have interim storage of non-waste mercury and mercury compounds intended for a use allowed to a party.

## Part E – Additional comments on this article

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### ▼ ART. 11: MERCURY WASTES

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

- Yes
- No

**If no, please explain**

Portugal does not have any mercury waste listed in the table annexed to Decision MC-3/5 of the Conference of the Parties.

**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**

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**▼ 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**

The following Technical Guidelines and Recommendations were made available on the Portuguese Environment Agency (APA) website to support operators and interested parties:

- (i) "Technical Guidelines – Reference Values for Soil" (APA, 2019);
  - (ii) "Technical Guidelines – Soil Sampling Plan and Soil Monitoring Plan" (APA, 2019);
  - (iii) "Technical Guidelines – Risk analysis and risk acceptability criteria" (APA, 2019);
  - (iv) "Technical Guidelines – Reference matrices for presenting analytical results" (APA, 2020);
  - (v) "Measures / Recommendations to be adopted concerning licensing, monitoring and inspection of urban operations – soil assessment and remediation" (APA, 2019);
  - (vi) "Recommendation regarding the transmission of the property right of a contaminated or potentially contaminated soil" (APA, 2020).
- The waste legislation already foresees the licensing of soil remediation projects.

**Part E – Additional comments on this article**

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**▼ 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**

Participation in technical working groups respecting chemical safety at multiple levels: national level, EU level, OECD level.

**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.

{Empty}

**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

{Empty}

Please provide comments, if any.

{Empty}

## Part E – Additional comments on this article

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### ▼ 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

We are not aware of Portugal's cooperation, as a Party, providing capacity-building, technical assistance, and technology transfer. Nevertheless, Portugal cooperated as a member state of the EU.

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

Yes

No

Please specify

{Empty}

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

Portugal has some mercury-contaminated sites and has provided contributions in this matter (see answer to question 13.1). Apart from contaminated sites, our research community (namely Universidade de Aveiro, IST – Instituto SuperiorTécnico) has also participated in international technical working groups.

## 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

**Supplemental: If yes, describe the measures that have been taken.**

As Portugal is the EU MS with the highest fish consumption per person ([https://oceans-and-fisheries.ec.europa.eu/news/eu-fish-market-report-2024-reveals-trends-and-insights-2024-12-12\\_en](https://oceans-and-fisheries.ec.europa.eu/news/eu-fish-market-report-2024-reveals-trends-and-insights-2024-12-12_en)), there are campaigns (targeting mainly vulnerable groups such as pregnant women) warning about the risk of mercury exposure by eating large quantities of some fish species.

#### 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

**Supplemental: If yes, describe the measures that have been taken.**

As already mentioned, the "mercury problem" in Portugal lies in the existence of contaminated sites. Regarding these sites, the Portuguese environmental authorities have issued guidelines concerning the construction sector, remediation operations, etc.

Our research community, namely the ENSP – National School of Public Health, has been developing some research on mercury exposure due to fish consumption.

## Part E – Additional comments on this article

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### ▼ ART. 17: INFORMATION EXCHANGE

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

Yes

No

**If yes, the Party may wish to indicate in the space provided below the exchange of information it has facilitated, such as:**

Scientific, technical, economic and legal information concerning mercury and mercury compounds, including toxicological, ecotoxicological and safety information

**Scientific, technical, economic and legal information concerning mercury and mercury compounds, including toxicological, ecotoxicological and safety information**

Through our research agencies (namely Universidade de Aveiro, IST, and ENSP, already mentioned), Portugal has provided scientific, technical, and information concerning mercury and mercury compounds, including toxicological, ecotoxicological, and safety information; and epidemiological information concerning health impacts associated with exposure to mercury and mercury compounds (namely mercury waste), in close cooperation with the World Health Organization and other relevant organizations.

- Information on the reduction or elimination of the production, use, trade, emissions and releases of mercury and mercury compounds
- Information on technically and economically viable alternatives to:
- Epidemiological information concerning health impacts associated with exposure to mercury and mercury compounds, in close cooperation with the World Health Organization and other relevant organizations, as appropriate. (Art. 17.1 (a)-(d))

## Part E – Additional comments on this article

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### ▼ 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

If yes, the party may wish to indicate in the space provided below, the measures it has taken to promote and facilitate information to the public, such as:

(a) Provision to the public of available information on:

- The effects of mercury and mercury compounds on human health and the environment

#### The effects of mercury and mercury compounds on human health and the environment

Provision to the public of available information on the risk of mercury exposure due to excessive consumption of certain fish species

- Alternatives to mercury and mercury compounds
- The topics identified in paragraph 1 of article 17
- The results of its research, development and monitoring activities under article 19
- Activities to meet its obligations under the Convention

(b) Education, training and public awareness related to the effects of exposure to mercury and mercury compounds on human health and the environment in collaboration with relevant intergovernmental and non-governmental organizations and vulnerable populations, as appropriate.

Activities to meet its obligations under the Convention

{Empty}

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

## Part E – Additional comments on this article

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### ▼ 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

If yes, the party may wish to indicate in the space provided below, the research, development and monitoring it has undertaken, such as:

Inventories of use, consumption, anthropogenic emissions to air and releases to water and land of mercury and mercury compounds

Modelling and geographically representative monitoring of levels of mercury and mercury compounds in vulnerable populations and in environmental media, including biotic media such as fish, marine mammals, sea turtles and birds, as well as collaboration in the collection and exchange of relevant and appropriate samples

**Modelling and geographically representative monitoring of levels of mercury and mercury compounds in vulnerable populations and in environmental media, including biotic media such as fish, marine mammals, sea turtles and birds, as well as collaboration in the collection and exchange of relevant and appropriate samples**

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Assessments of the impact of mercury and mercury compounds on human health and the environment, in addition to social, economic and cultural impacts, particularly in respect of vulnerable populations

Harmonized methodologies for the activities undertaken under subparagraphs (a), (b) and (c) of paragraph 1 of article 19

Information on the environmental cycle, transport (including long-range transport and deposition), transformation and fate of mercury and mercury compounds in a range of ecosystems, taking appropriate account of the distinction between anthropogenic and natural emissions and releases of mercury and of remobilization of mercury from historic deposition

Information on commerce and trade in mercury and mercury compounds and mercury-added products

Information and research on the technical and economic availability of mercury-free products and processes and on best available techniques and best environmental practices to reduce and monitor emissions and releases of mercury and mercury compounds

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

## **Part E – Additional comments on this article**

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### **▼ 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}