

2025 FULL REPORTS OF THE MINAMATA CONVENTION ON MERCURY

Report submitted on 29 December 2025

*Question 4.3 amended by Spain on 7 April 2026



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.

REPORTING PERIOD:

1 January 2021 to 31 December 2024

UNOFFICIAL ENGLISH TRANSLATION

Attachments can be found on the website

▼ INFORMATION ON THE PARTY

1. Information on the party

Name of party

Spain

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

13 December 2021

Date of entry into force of the Convention for the party

13 March 2022

2. Information on the national focal point

Full name of the institution

Ministry for Ecological Transition and the Demographic Challenge

Title of Contact Officer

Ms.

Name of Contact Officer

M. Angeles Jiménez Redondo

Mailing address

Plaza de San Juan de la Cruz, 10, 28071, Madrid

Telephone number

+34 915976630

Fax number

{Empty}

E-mail

ajredondo@miteco.es

Second E-mail

{Empty}

Web page

{Empty}

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

ba33a_subsection

i. Please attach the results of your endeavour or indicate where it is available on the Internet;

- [ESP_3.3.xlsx](#)

i. Please attach the results of your endeavour or indicate where it is available on the Internet;

<https://miteco.sharepoint.com/:x:/r/sites/DGCEA->

[SGALSIAreadeQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7BD4768578-1FF8-4D00-AC4A-47D52B1320F7%7D&file=2025_anexo_respuesta_fuentes.xlsx&action=default&mobileredirect=true](https://miteco.sharepoint.com/:x:/r/sites/DGCEA-SGALSIAreadeQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7BD4768578-1FF8-4D00-AC4A-47D52B1320F7%7D&file=2025_anexo_respuesta_fuentes.xlsx&action=default&mobileredirect=true)

ii. Supplemental: Please provide any related information – for example, on the use or disposal of mercury from such stocks.

{Empty}

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.

Yes. In recent years, the country has taken specific actions to identify and eliminate supply–generating stockpiles of mercury exceeding 10 metric tons annually located within its territory.

As a result of these measures, these stockpiles have been eliminated, and there are currently no such sources within the national territory.

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

If yes, please explain the measures taken to ensure that the excess mercury was disposed of in accordance with the guidelines for environmentally sound management referred to in paragraph 3 (a) of article 11 using operations that did not lead to recovery, recycling, reclamation, direct re–use or alternative uses.

Pursuant to Article 11 of Regulation 2017/852, mercury and mercury compounds from this source are considered waste. Therefore, these facilities are obligated to dispose of this waste without detriment to

human health or the environment. Furthermore, as noted in the previous response, the Competent Authority maintains close contact with the chlor-alkali plants being decommissioned and keeps a record of their stockpiles.

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

{Empty}

▼ 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.

Article 5 of Regulation 2017/852 prohibits the import, export, and manufacture of products with added mercury listed in Part I of Annex A to the Minamata Convention.

Regulation (EC) No 649/2012 on the export and import of dangerous chemicals establishes an export notification procedure and rules for the application in the European Union of the Prior Informed Consent (PIC) procedure of the UNEP Rotterdam Convention. With regard to mercury, this Regulation prohibits the export (outside the European Union) of toilet soap containing mercury, certain mercury compounds (cinnabar ore, Hg_2Cl_2 , and HgO , except when exported for medical, analytical, or research and development purposes), and metallic mercury and mixtures thereof, including amalgams, containing at least 95% mercury by weight. The export of the remaining mercury compounds is subject to the procedures of this Regulation, known as the PIC Regulation.

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.

Yes, this product has been banned and, as a result, its use is discouraged and the adoption of safer and more environmentally friendly alternatives is encouraged.

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.

Dental amalgam is indeed subject to mandatory provisions following the amendment to Annex A adopted under Decision MC-4/3, which entered into force on 28 September 2023. In this respect, Spain fully applies these provisions.

Furthermore, dental amalgam is effectively prohibited in Spain in accordance with the applicable European Union legislation, which is directly implemented at national level.

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.

Numerous initiatives have been undertaken at both European and national levels aimed at reducing the incorporation of mercury into finished products and progressively limiting its presence on the market. In this regard, Article 5 of Regulation (EU) 2017/852 establishes a ban on the export, import, and manufacture within the European Union of products with added mercury listed in Annex II of that regulation, from the dates indicated therein. This annex includes the products described in Annex A of the Minamata Convention, thus ensuring consistency between European legislation and international commitments to eliminate products containing added mercury.

For its part, Regulation (EC) 1907/2006, better known as REACH, concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, establishes that mercury compounds intended for preventing biofouling on ship hulls, equipment used in fish farming, or equipment totally or partially submerged; for the protection of wood; may not be placed on the market or used in the European Union, either as substances or in mixtures. to the impregnation of heavy industrial textiles and the treatment of industrial wastewater. These restrictions have significantly contributed to reducing potential sources of mercury release into the environment.

Additionally, Regulation (EC) 552/2009, amending the REACH Regulation, prohibits the marketing in the European Union of fever thermometers and other general-purpose measuring devices, such as pressure gauges, blood pressure monitors, or barometers, containing mercury. This measure was subsequently extended by Regulation (EU) 847/2012, which also amends the REACH Regulation and extends the prohibition to mercury-containing measuring devices intended for industrial and professional use, thus facilitating a gradual but complete phase-out of these types of devices.

In the area of Spanish legislation, Royal Decree 106/2008, on batteries and accumulators and the environmental management of their waste, which transposes Directives 2006/66/EC and 2013/56/EU, prohibits the placing on the market of batteries and accumulators that exceed certain mercury content

thresholds. Furthermore, Royal Decree 219/2013 limits the use of certain hazardous substances, including mercury, in electrical and electronic equipment, aligning with European regulations on the restriction of hazardous substances (RoHS). These measures have allowed for a progressive reduction in the presence of mercury in consumer and professional products, facilitating a transition towards safer and more sustainable alternatives.

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.

Article 8 of Regulation (EU) 2017/852 prohibits economic operators from manufacturing and placing on the market within the European Union products containing added mercury that were not manufactured before 1 January 2018. Exceptions may only be authorized when it is demonstrated that the new mercury-based product or manufacturing process would provide significant benefits to health or the environment without generating relevant risks to either, and provided that there are no technically feasible mercury-free alternatives that can offer the same benefits. The article also provides a specific exemption for equipment intended for defense use, for products to be sent into space, and for technical improvements or redesigns of products containing added mercury whose manufacture began before 1 January 2018.

In recent years, the European Union has considerably strengthened the regulatory framework applicable to products containing added mercury. With the adoption of Regulation (EU) 2024/1849, the list of prohibited products has been expanded, and decisive progress has been made towards the progressive elimination of mercury from the European market. As a result of this revision, from 1 January 2025, the manufacture, import, and export of most products that still contained added mercury will be prohibited throughout the Union, except in the cases strictly provided for by the regulations. This expansion of the prohibition includes devices such as certain lamps and measuring instruments, reinforcing consistency with the obligations arising from the Minamata Convention on Mercury.

The new regulatory framework provides only very limited exceptions for essential product categories, such as equipment for military use, devices intended for space missions, and certain instruments used in scientific research or metrological calibration for which there are still no technically equivalent mercury-free alternatives. These exceptions aim to balance environmental protection objectives with very specific technical or strategic needs that require longer substitution timeframes.

The revised regulation thus consolidates a process of phasing out mercury in consumer, industrial, and professional products, in line with international objectives to reduce emissions and releases of this metal. Extending the restrictions from 2025 marks a significant step towards a mercury-free European environment and represents one of the most important regulatory advances since Regulation 2017/852 came into force.

Part E – Additional comments on this article

{Empty}

▼ 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)

If yes, please provide information on these measures.

Article 7 of Regulation 2017/852 prohibits the use of mercury and mercury compounds in a number of industrial processes from January 2022. There is a specific case for the production of chlor-alkali in which mercury is used as an electrode, which was prohibited earlier, on December 11, 2017.

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)

If yes, please provide information on these measures.

Yes, there are measures in place to restrict the use of mercury and mercury compounds in the processes included in Part II of Annex B, as the use of mercury is prohibited by Regulation (EU) 2017/852 of the European Parliament and of the Council, in accordance with the provisions set out therein.

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.

If yes, please provide information on the measures taken.

Yes, the Party has discouraged the development of this type of facility. In the past, an application was received to use a manufacturing process involving the intentional use of mercury, which was denied for failing to meet the established criteria, as it was deemed technically and environmentally unsuitable.

Part E – Additional comments on this article

{Empty}

▼ 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

Launched in 2005, the Global Mercury Partnership (GMP) plays a key role in catalyzing global action on mercury and providing information, capacity building, and awareness-raising in support of the implementation of the Minamata Convention. The GMP comprises eight areas of work, representing sectors that use mercury or process mercury-containing raw materials, as well as key issues in mercury science and management. Spain co-leads, along with Uruguay, the Mercury Supply and Storage area, which aims to identify and characterize relevant supply sources, the amount of mercury generated, and the fate of the mercury obtained. This will contribute to minimizing and, where feasible, eliminating the mercury supply, considering a hierarchy of sources, and removing mercury from the market for environmentally sound

management. One of the main concerns for this area has been the supply of mercury to artisanal and small-scale gold mining activities. This area has initiated work and consultations to gather information on this issue in order to combat it more effectively.

▼ 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)

If Yes, please explain

Yes, the Party has required the use of best available techniques and best environmental practices (BAT/BEP) to control and, where possible, reduce emissions from new sources within the established timeframe.

This requirement is applied under Law 16/2002 of 1 July, on integrated pollution prevention and control, which establishes the obligation to apply BAT at the affected facilities, in accordance with current Spanish and European regulations.

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

Among the measures adopted is the Agreement for a Just Energy Transition for closing thermal power plants, which articulates the orderly closure of the facilities, the progressive reduction of emissions associated with coal generation and the replacement of this activity with more sustainable energy and industrial uses and projects, contributing to the protection of the environment and the transition to a low-carbon energy model.

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

These measures are applied under Law 16/2002, of July 1, on integrated pollution prevention and control, which establishes, for example, the obligation to apply BAT in the affected facilities, in accordance with current Spanish and European regulations.

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

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?

10 December 2025

Please indicate where this inventory is available

[https://miteco.sharepoint.com/:x:/r/sites/DGCEA-](https://miteco.sharepoint.com/:x:/r/sites/DGCEA-SGALSIAreadeQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7B496D7FBA-FB23-44FB-83FB-29F044FFD937%7D&file=2025_anexo_respuesta_fuentes%20pertinentes.xlsx&action=default&mobileredirect=true)

[SGALSIAreadeQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7B496D7FBA-FB23-44FB-83FB-29F044FFD937%7D&file=2025_anexo_respuesta_fuentes%20pertinentes.xlsx&action=default&mobileredirect=true](https://miteco.sharepoint.com/:x:/r/sites/DGCEA-SGALSIAreadeQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7B496D7FBA-FB23-44FB-83FB-29F044FFD937%7D&file=2025_anexo_respuesta_fuentes%20pertinentes.xlsx&action=default&mobileredirect=true)

Attach

- [ESP_8.3.xlsx](#)

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

Because the existing regulatory framework is functioning effectively, it is not considered necessary to develop an additional specific plan. In particular, Regulation (EU) 2017/852 of the European Parliament and of the Council on mercury, together with Law 16/2002 of 1 July on integrated pollution prevention and control, ensure adequate control of emissions by prohibiting the use of mercury and mandating the application of best available techniques, and therefore emissions are being properly monitored.

▼ 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)

When was the inventory last updated?

10 December 2025

Please indicate where this inventory is available.

[ESP_9.2.xlsx](#)

Please explain

[https://miteco.sharepoint.com/:x:/r/sites/DGCEA-](https://miteco.sharepoint.com/:x:/r/sites/DGCEA-SGALSI/ReadQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7B496D7FBA-FB23-44FB-83FB-29F044FFD937%7D&file=2025_anexo_respuesta_fuentes%20pertinentes.xlsx&action=default&mobileredirect=true)

[SGALSI/ReadQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7B496D7FBA-FB23-44FB-83FB-29F044FFD937%7D&file=2025_anexo_respuesta_fuentes%20pertinentes.xlsx&action=default&mobileredirect=true](https://miteco.sharepoint.com/:x:/r/sites/DGCEA-SGALSI/ReadQuimicosInternacional/_layouts/15/Doc.aspx?sourcedoc=%7B496D7FBA-FB23-44FB-83FB-29F044FFD937%7D&file=2025_anexo_respuesta_fuentes%20pertinentes.xlsx&action=default&mobileredirect=true)

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.

According to paragraph 3 of Article 7 of Regulation 2017/852, the storage of mercury shall be carried out in an environmentally sound manner, in accordance with the thresholds and requirements set out in Directive 2012/18/EU of the European Parliament and of the Council (14), and in Directive 2010/75/EU.

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

Please describe measure and effectiveness of measures

Chapter IV (Waste and Mercury Waste Disposal) of Regulation 2017/852 establishes measures for the environmentally sound management and proper storage of mercury waste. Article 3 of the same regulation prohibits the export of mercury for recovery purposes.

Furthermore, Order AAA/661/2013 was approved, amending Annexes I, II, and III of Royal Decree 1481/2001, which regulates waste disposal by landfilling. This includes the transposition of Directive 2011/97/EU, which amends Directive 1999/31/EC (on landfill waste) with regard to specific criteria for the storage of metallic mercury considered waste.

Finally, Royal Decree 840/2015 was approved, establishing measures for controlling the risks inherent in major accidents involving hazardous substances, including the temporary storage of metallic mercury considered waste.

☐ 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

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.

....

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

Spain is developing a map of contaminated soils that includes soils contaminated by mercury within its territory. Furthermore, CIEMAT has carried out several projects to determine mercury levels in contaminated soils.

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

Spain has a specific department dedicated to compliance with several international conventions, including the Minamata Convention. The Institutional Coordination Area, within the Ministry for Ecological Transition and the Demographic Challenge, works to ensure the implementation of this Convention and facilitates the Ministry's coordination with Convention-related processes at the European and international levels.

Spain maintains an inventory of pollutant emissions, including mercury. PRTR-Spain is the State Register of Emissions and Pollutant Sources. This register provides public access to information on emissions of pollutants into the air, water, and soil, as well as data on waste transfers from major industries and other point and non-point sources.

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.

Spain does not participate in the Specific International Programme. However, due to its membership in the United Nations, it contributes to the Global Environment Facility trust fund. These contributions are made through efforts to reduce the impact of climate change, not through specific programs for chemicals. This activity falls under the purview of another Ministry, and specific figures are not currently available.

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

Spain ratified the Minamata Convention. Spain's contribution is made indirectly through its official contribution to the Global Environment Facility. Specific contributions to the Minamata Convention will be considered, although they are limited by a tight budget.

Please provide comments, if any.

{Empty}

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 Party has cooperated in providing technical assistance and capacity building pursuant to Article 14 of the Convention. Spain has played an active role in international cooperation on mercury and, in previous years, participated prominently in the Supply and Storage area of the Global Mercury Partnership, contributing to various technical and capacity-building initiatives driven by this framework and other relevant multilateral bodies.

Over the past few years, Spain has continued to participate in technical support activities for other Parties to the Convention, sharing regulatory expertise and knowledge derived from the transition to mercury-free technologies and the environmentally sound management of mercury waste and stockpiles. Key activities include participation in international workshops and forums focused on the decommissioning of chlor-alkali plants based on mercury technology, the management of contaminated sites, and the application of best available techniques and environmental best practices in industrial sectors subject to the Convention.

Spain has continued to contribute to technical work carried out within the framework of the United Nations Environment Programme and the Global Mercury Partnership, particularly in areas related to the safe storage of residual mercury, the environmentally sound management of mercury waste, and the exchange of experiences for emissions reduction. It has also collaborated in regional capacity-building activities, especially in Latin America and the Caribbean, sharing its accumulated experience in applying the European Mercury Regulation and in implementing measures for the phase-out of products containing added mercury.

These actions complement previous initiatives undertaken by Spain, including the presentation on the cessation of mercury-containing chlor-alkali production in Spain at the Mercury Contaminated Sites Management Workshop (2021), the technical assistance provided for the report "Mercury in Oil and Natural

Gas" (2020–2021), the organization of the workshop for training on decommissioning, waste management, and contaminated sites associated with the chlor-alkali industry (2018), and the workshop on the challenges of mercury management in the Latin America and Caribbean region (2012).

Taken together, these activities reflect Spain's ongoing commitment to strengthening the capacities of other Parties to the Convention and to promoting environmentally sound mercury management internationally.

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

☐ Yes

☒ No

Please specify

The Party has not required, nor requested, technical or capacity-building assistance

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

Spain has promoted and facilitated the development, transfer, dissemination, and access to updated and environmentally friendly alternative technologies. Spain has participated in various international initiatives aimed at replacing mercury-based technologies, improving the environmentally sound management of mercury waste and stockpiles, and facilitating the adoption of safe alternatives in other countries. In previous years, Spain played a significant role within the Supply and Storage area of the Global Mercury Partnership, contributing to the dissemination of technical knowledge and the exchange of experiences on mercury-free technologies.

In recent years, Spain has maintained this line of cooperation, participating in workshops, technical groups, and capacity-building activities focused on the transition to safer and more environmentally friendly technologies. Among the most noteworthy activities are the presentation of Spain's experience in the process of closing and replacing mercury-based chlor-alkali technology during the international workshop on Mercury-Contaminated Site Management held in 2021, as well as the technical assistance provided for the preparation of the report "Mercury in Oil and Natural Gas" between 2020 and 2021, which contributed to the development of alternative methodologies and technologies for the identification and management of mercury in this sector.

Spain has also participated in training activities for the decommissioning of facilities based on mercury technologies, the management of associated waste, and the remediation of contaminated sites, following the framework of the 2018 workshop on the decommissioning and waste management of the chlor-alkali industry. Similarly, Spain's experience has been shared in regional initiatives aimed at improving mercury management in Latin America and the Caribbean, continuing the work begun with the 2012 workshop on this subject.

Furthermore, Spain has participated in international technical forums dedicated to the development and dissemination of best available techniques (BAT) and best environmental practices (BEP) applicable to sectors regulated by the Minamata Convention, which has contributed to the transfer of knowledge and alternative mercury-free technologies.

Part E – Additional comments on this article

{Empty}

▼ 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.

Various measures have been taken to provide the public with information on mercury exposure, in accordance with paragraph 1 of Article 16 of the Convention. The Ministry for Ecological Transition and the Demographic Challenge maintains an active and up-to-date section on mercury on its institutional website, offering general information on the chemical characteristics of mercury, its origin and applications, the history of mercury in Spain, the health effects of mercury, and applicable national and international regulations, including the Minamata Convention. Since 2021, this section has been regularly updated to incorporate regulatory changes and new informational materials.

In 2019, the Spanish Agency for Food Safety and Nutrition (AESAN) updated its fish consumption recommendations for the general population and vulnerable groups due to the potential presence of mercury in certain species. These recommendations, which remain in effect, have been widely disseminated in subsequent years through information bulletins, social media campaigns, and informational materials aimed at families, schools, and healthcare professionals. Between 2021 and 2024, AESAN continued publishing clarifications, press releases, and frequently asked questions documents regarding mercury intake through food, especially in relation to fish and shellfish, reinforcing the dissemination of criteria based on scientific evidence.

During this period, informational content on various institutional platforms was also updated following developments in European regulations on mercury, including the review of restrictions on products with added mercury, the upcoming phase-out of dental amalgam, and the implications of Regulation (EU) 2024/1849. This information was disseminated to both healthcare professionals and the general public, facilitating access to clear explanations about the new limitations and available alternatives.

Furthermore, between 2021 and 2024, documents related to emissions monitoring, environmental surveillance data, and explanatory materials on the risks associated with mercury, particularly those linked to dietary exposure and industrial sources of emissions, were incorporated into public environmental information portals. These updates have helped improve public access to current, understandable, and prevention-oriented information.

Overall, the actions taken during this period have expanded the availability of information on mercury exposure and recommended preventive measures, in line with the obligations under Article 16 of the Convention.

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.

In addition to providing information to the public, numerous regulatory and health measures have been adopted to protect human health from mercury exposure, in accordance with Article 16 of the Minamata Convention. Regulation (EU) 2017/852, as well as complementary European and national legislation, establish strict limits on the presence of mercury in products, the environment, and various areas of human exposure.

At the national level, the limits established in Royal Decree 140/2003 on the quality of drinking water, which sets a limit of 1 µg/l for mercury, remain in force, as do the occupational exposure limits set out in Directive 2009/161/EU and its transposition by Royal Decree 374/2001, which establish a limit of 0.02 mg/m³ for mercury and its divalent inorganic compounds in air as an 8-hour time-weighted average.

Other regulations governing the presence of mercury in products that may represent routes of exposure for the population also remain applicable: Royal Decree 1205/2011 on toy safety; Regulation (EC) No 1223/2009 on cosmetic products, which prohibits the use of mercury and its compounds except in very limited circumstances; Regulation (EC) No 149/2008 establishing maximum residue limits for pesticides in food and feed; Royal Decree 1310/1990 on the use of sewage sludge in the agricultural sector, which sets limit values for heavy metals, including mercury, in soils and sludge; and Regulation (EC) No 1881/2006, which sets maximum mercury levels in various foodstuffs, especially fishery products.

Between 2021 and 2024, new measures were adopted as a result of the updated European framework for mercury control, including the review of bans on products with added mercury and the updating of restrictions applicable to industrial sectors. The adoption of Regulation (EU) 2024/1849 has particularly strengthened the protection of human health by extending the bans on products with added mercury and establishing the phase-out of dental amalgam from 1 January 2025, except in strictly justified cases. This change represents a further and significant reduction in a potential route of population exposure to mercury.

Furthermore, during this period, guidelines and materials for healthcare professionals and public health authorities were updated to ensure the proper implementation of the new regulatory obligations, especially regarding food safety monitoring, the control of mercury residues, and the adoption of safer alternatives in sectors where exceptions still existed.

On the other hand, the scientific assessments prepared by the European Food Safety Authority (EFSA) continue to be used as a reference, including its 2015 opinion on the risks of methylmercury in fish and shellfish compared to the nutritional benefits of their consumption. These assessments continue to be integrated into national and European recommendations on the safe consumption of fish, which are updated as necessary based on the available scientific evidence.

Taken together, these measures—regulatory, preventive, and surveillance-related—complement the provision of information to the public and contribute to reducing the population's exposure to mercury in its various forms.

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

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

{Empty}

☒ Information on the reduction or elimination of the production, use, trade, emissions and releases of mercury and mercury compounds

Information on the reduction or elimination of the production, use, trade, emissions and releases of mercury and mercury compounds

{Empty}

☒ Information on technically and economically viable alternatives to:

Mercury-added products

{Empty}

Manufacturing processes in which mercury or mercury compounds are used

{Empty}

Activities and processes that emit or release mercury or mercury compounds

{Empty}

☐ 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

{Empty}

▼ 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

☐ 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

The Ministry for Ecological Transition and the Demographic Challenge maintains an active section on mercury on its website (<https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/productos-quimicos/mercurio/>):

This section contains information on:

- General information about mercury (chemistry, origin, applications...)
- The Minamata Convention
- The history of mercury in Spain
- The effects of mercury on health
- Regulations on mercury

(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

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

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

Spain maintains and updates annually the official inventory of pollutant releases and transfers through PRTR-Spain, which includes verified data on mercury emissions to air, water, and soil, as well as off-site

transfers. This tool provides public and standardized information in accordance with the requirements of the Convention.

☒ 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

Spain carries out official mercury controls in food, especially fish and seafood, through the Spanish Agency for Food Safety and Nutrition (AESAN), in accordance with Regulation (EC) No 1881/2006. Mercury measurements are also carried out in water in accordance with the Water Framework Directive (WFD), which requires monitoring the chemical status of water bodies, including the analysis of priority contaminants such as mercury.

☒ 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

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

Spain uses EFSA assessments—including the 2015 Scientific Opinion on methylmercury in fish and shellfish—to evaluate dietary exposure and guide consumption recommendations for the general population and vulnerable groups. Official food control campaigns also allow for the assessment of the actual presence of mercury in seafood products distributed in Spain.

Furthermore, between 2019 and 2021, two CSIC projects were carried out in Colombia (Atrato and Chocó), the results of which included human and environmental biomonitoring, providing confirmed information on the effects of mercury in exposed communities.

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

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

The above activities are carried out using harmonised methodologies established by:

Regulation (EU) 2017/852 on mercury;

the Water Framework Directive for chemical monitoring;

European Union food safety legislation, in particular Regulation 1881/2006 and its amendments; and

the PRTR emissions reporting guidelines.

These methodologies ensure the comparability and consistency of the data.

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

Spain reports information on mercury trade to the European Union in compliance with Regulation (EU) 2017/852, which governs the import, export, and use of mercury and mercury-added products. The EU also maintains public information on technological alternatives and phased-out bans, which is used by Member States.

There is no evidence of any additional projects specific to Spain in this area between 2021 and 2024; therefore, unverified claims are not included.

☐ 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

{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}