



## Secretariat of the Minamata Convention on Mercury

United Nations Environment Programme

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## Battery Industry Joint Position Paper for COP5 of Minamata Convention

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The representatives of the undersigned associations encompassing battery producers in Japan, Europe, North America, and Latin America are writing to express our opinion on the revision of Annex A, Part I to the Minamata Convention. This responds to the calls for information issued by the Secretariat in COP4-2. We already posted the first position paper in April 2020 focusing on availability of mercury-free alternatives. In this second paper we aim to reinforce our opinion with more comprehensive information.

### 1. Availability of mercury-free alternatives

- a) All members of BAJ, EPBA, NEMA and ALPiBa have already ceased manufacturing mercury-added button batteries and supply mercury-free alternatives across the world. The members of these signatory associations have prominent button battery brands such as Varta, Rayovac, Maxell, Seiko, Sony, Murata, GP, Panasonic, Duracell, Energizer, etc. When it comes to silver oxide and zinc air batteries exempted by Annex A, we believe our products collectively represent 90% of the global market.
- b) Though we are based in Japan, Europe, and American Continent, our products are widely available in other regions. To take an example from the important Asian markets, India, which has no local producer of button batteries, imports 96 % of silver oxide batteries from Hong Kong and Japan. Hong Kong in turn imports 93 % of those batteries from Japan. As a result, most silver oxide batteries used in India can be seen mercury-free. Many countries depend on import and there are similar cases to India.

### 2. Technical and economic feasibility of mercury-free alternatives

- a) Mercury-free technology in button batteries has years of history and there exist a lot of usable patents. Technical hurdles to mercury-free alternatives are not so high.
- b) Mercury-free button batteries are already comparable in price with mercury-added ones. As mentioned above, major manufacturers have completely shifted to mercury-free. If they had to restart production of mercury-added products, it could be higher in costs.

### 3. Environmental impacts

- a) Because of their tiny size, waste button batteries are difficult to collect separately. Quite a few of them are incinerated with household wastes, leading to mercury emissions into the air. As long as mercury-added button batteries are left to exist, this risk continues.
- b) Mercury-free button batteries can make easier waste management because they need no special treatment of mercury.

4. Progress of mercury-free regulations in the world

With increasing availability of mercury-free alternatives as a backdrop, 42 countries/regions have already banned mercury use in **all the batteries**.

Europe	EU27, UK, Switzerland, Norway, Moldova, Bosnia & Herzegovina
N.America	USA(Connecticut, Rhode Island, Maine, Wisconsin, Illinois), Canada
Asia	China, South Korea, Taiwan, Singapore

2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
-Connecticut, USA	-EU27			-Switzerland		-Taiwan			-South Korea	
-Rhode Island, USA	-UK			-Norway		-Moldova			-Bosnia & Herzegovina	
-Maine, USA		-Wisconsin, USA			-Canada		-Singapore			
		-Illinois, USA								-China

5. Conclusion: Proposal to revise Annex A, Part1

Therefore, we propose to **put an end to button battery exemptions and set threshold of 5ppm** as per the following table:

<table: Annex A, Part I (subject to mercury ban) >

Current Stipulation	Our Proposal
Batteries, except for button zinc silver oxide batteries with a mercury content < 2% and button zinc air batteries with a mercury content < 2%	<b>Batteries, with a mercury content &gt; 5ppm</b>

NOTE: The proposal contains a 5ppm threshold because mercury exists in nature and is difficult to eliminate completely in manufactured products. The 5ppm threshold is consistent with the EU Batteries Directive<sup>1</sup> that is referenced around the globe. Batteries with a mercury content less than or equal to 5ppm are regarded as mercury-free (*i.e.*, not intentionally mercury-added).

Yours sincerely,

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<sup>1</sup> DIRECTIVE 2006/66/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 6 September 2006 on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC

**About BAJ**

Battery Association of Japan is the industry organization representing 100 battery-related companies in Japan and focuses on promoting standardization, environmental preservation, product safety, etc.

**About EPBA**

European Portable Battery Association is the authoritative voice of the portable power industry. It supports the common interests of its members regarding portable batteries and battery chargers with European institutions and other leading international bodies to provide consumers with complete power solutions which are sustainable across their life cycle.

**About NEMA**

The National Electrical Manufacturers Association represents US-based electrical equipment and medical imaging manufacturers. The NEMA Dry Battery Section responds to battery-related regulatory issues in North America.

**About ALPiBA**

Latina American Battery Association (Asociacion Latinoamericana de Pilas y Baterias AC) performs lobbying for the development of regulatory processes on batteries in the Latin American region.