



Project for
**Promoting
Minamata
Convention
on Mercury**



by making the most of Japan's
knowledge and experiences

Customs Training to Enhance Monitoring of Trade of Mercury and Mercury Compounds

Regional training

Presentations at the workshop in Sri Lanka on 3-4 June 2025

Indonesia Country Profile

Indonesia - Geological and Socio-Economic Profiles

- Indonesia: An Archipelagic Nation with Thousands of Small Islands
- Location: At the convergence of three major tectonic plates (Eurasian, Indo-Australian, Pacific)
- Volcanic Activity: Over 120 active volcanoes (e.g., Mount Merapi, Semeru)
- Seismic Risk: Prone to earthquakes and tsunamis (e.g., Cianjur quake, Semeru eruption)
- Natural Resources: Rich in coal, nickel, gold, copper, and natural gas

- Population (2024): ~279.7 million (4th largest globally)
- Median Age: 29.9 years (young population)
- Ethnic Diversity: Over 600 ethnic groups;

- GDP Growth (Q1 2025): 4.87% (slightly down from 5% in 2023)
- Key Sectors: Manufacturing (19.3%), Trade (13.2%), Agriculture (11.6%), Construction (10.2%), Mining (9.3%)
- Inflation Rate (May 2025): 1.60% (due to increased rice production)

National Situation of Mercury Trade in Indonesia

Illegal Trade

- Indonesia has the potential to become a transit country in the illegal mercury trade due to its strategic geographic location and porous maritime borders.
- Smuggling occurs via informal ports, border areas and online platforms.
- Involves transnational criminal networks exploiting weak enforcement and limited surveillance.

Import & Export

- Officially banned under Minamata Convention, but illicit import continues
- Multiple cases of illegal importation seized by Customs in recent years.

Mercury-Added Products

- Despite regulations, mercury-added items such as batteries, thermometers, lamps, and cosmetics are still found in informal markets.
- Enforcement is difficult in remote or under-resourced regions.

Formal Sector

- Mercury use is largely phased out in regulated industries.
- Large-scale mining operations have transitioned to non-mercury alternatives.

Informal Sector

- Artisanal and Small-Scale Gold Mining (ASGM) remains the largest mercury consumer.
- Severe impacts: mercury poisoning, environmental degradation, water pollution

Mercury Waste Management

- Poor handling leads to soil and water contamination.
- Gaps include:
 - Limited hazardous waste infrastructure
 - Lack of secure landfills and incineration facilities
 - Insufficient monitoring of contaminated sites

Legal Framework And Mercury Trade Control

- Presidential Regulation No. 21/2019: National Action Plan for Mercury Reduction and Elimination
- Government Regulation No. 74/2001: Mercury and its compounds are classified as restricted hazardous substances (B3) with limitations on use, import, and production.
- Government Regulation No. 80/2019: E-commerce platforms must not sell prohibited or restricted goods, including mercury and mercury-added products.
- Minister of Trade Regulation No. 40/2022 (amending No. 18/2021): Cinnabar ore (HS Code 2617.90.00) is prohibited for export.
- Minister of Trade Regulation No. 8/2024: Mercury (HS 2805.40.00) is banned from importation for use in gold mining and cosmetic industries.
- BPOM Regulation No. 23/2019: Mercury is strictly prohibited as an ingredient in cosmetics.

More than 6-digit HS codes for mercury added products

- In line with the ASEAN Agreement on Customs, which was ratified through Presidential Regulation No. 137 of 2014, Indonesia is obligated to implement the Harmonized System (HS) and the 8-digit ASEAN Harmonized Tariff Nomenclature (AHTN) in accordance with the AHTN Protocol.
- **Indonesian Customs Tariff Book (BTKI)**
 - Developed based on **Harmonized System (HS) 2022** and **ASEAN Harmonized Tariff Nomenclature (AHTN) 2022**.
 - Applies an **8-digit structure** consistent with AHTN 2022.
 - Includes **Chapters 98 and 99** for special provisions and specific national policies.

Pengaturan existing Permendag 25/2022 (Pembatasan Impor)

Merkuri dengan Pos Tarif/HS 2805.40.00 dilarang impornya untuk digunakan oleh atau didistribusikan kepada pertambangan emas dan industri kosmetik.

No	Pos Tarif	Uraian Barang	Nama Bahan Kimia	Nomor CAS	Kode Daftar	Kemasan Terkecil Distributor		Persyaratan	Keterangan	IT/IP	PI	LS	Post Border
						Keperluan Lain Tidak Untuk Pangan	Laboratorium/Penelitian						
		dihitung dari berat kering.						memenuhi syarat keamanan, keselamatan, kesehatan pekerja dan lingkungan hidup; dan	b. Data yang tersedia, dalam hal Negara Komoditas belum ditetapkan.				
	28.05	Logam alkali atau logam alkali tanah; logam tanah jarang, skandium dan itrium, dicampur atau dipadu maupun tidak; merkuri.						2. Surat	Verifikasi atau				
3517.	2805.40.00	- Merkuri		7439-97-6	-	-	-	pernyataan bermeterai yang ditandatangani oleh penanggung jawab	Penelusuran Teknis Impor (VPTI) dilakukan di:	√	√	√	
	28.10	Oksida boron; asam borat.											
3518.	2810.00.20	- Asam borat		10043-35-3	-	1 kg	25 g		a. Negara muat;	√	√	√	

Pengaturan existing Permendag 40/2022 (Pelarangan Impor)

X. JENIS ALAT KESEHATAN YANG MENGANDUNG MERKURI

No	Pos Tarif/HS	Uraian Barang	Keterangan
165.	ex 2853.90.90	Amalgam gigi yang mengandung merkuri	
166.	ex 9018.90.90	Alat ukur tekanan darah (sfigmomanometer) mengandung air raksa	
167.	ex 9025.11.00	Termometer mengandung air raksa	

MENTERI PERDAGANGAN REPUBLIK INDONESIA,

ttd.

MUHAMMAD LUTFI

Salinan sesuai dengan aslinya

Sekretariat Jenderal

Kementerian Perdagangan

Kepala Biro Hukum,


SRI HARIYATI

Proposal Secretariat dan BTKI 2022

In the following table, the first column shows existing codes used by some parties and the second column provides proposed codes to distinguish mercury-added products from other products. The proposed codes and descriptions are shown in shaded cells

Cosmetics

Existing code	Proposed statistical codes	Description
3304.10.01		Lip make-up preparations
	3304.10.01.10	With mercury content less than or equal to 1 ppm
	3304.10.01.20	With mercury content more than 1 ppm
3304.20.01		Eye make-up preparations
	3304.20.01.10	With mercury content less than or equal to 1 ppm
	3304.20.01.20	With mercury content more than 1 ppm and mercury is used as a preservative
	3304.20.01.30	With mercury content more than 1 ppm and mercury is not used as a preservative
3304.30.00		Manicure or pedicure preparations
	3304.30.00.10	With mercury content less than or equal to 1 ppm
	3304.30.00.20	With mercury content more than 1 ppm
3304.90.00		Other
	3304.90.00.10	With mercury content less than or equal to 1 ppm
	3304.90.00.20	With mercury content more than 1 ppm
3304.91.01		Powders, including compacts
	3304.91.01.10	With mercury content less than or equal to 1 ppm
	3304.91.01.20	With mercury content more than 1 ppm

33.04

Preparat kecantikan atau rias dan preparat untuk perawatan kulit (selain obat-obatan), termasuk preparat pelindung kulit terhadap sinar matahari atau pencoklat kulit; preparat manikur atau pedikur.

3304.10.00

- Preparat rias bibir

3304.20.00

- Preparat rias mata

3304.30.00

- Preparat manikur dan pedikur

- Lain-lain :

3304.91.00

- - Bubuk, dipadatkan maupun tidak

3304.99

- - Lain-lain :

3304.99.20

- - - Preparat anti jerawat

3304.99.30

- - - Krim dan losion lainnya untuk wajah atau kulit

3304.99.90

- - - Lain-lain

Proposal Secretariat dan BTKI 2022

Soap and organic surface-active products and preparations, in the form of bars, cakes, moulded pieces or shapes, and paper, wadding, felt and nonwovens, impregnated, coated or covered with soap or detergent		
For toilet use (including medicated products)		
3401.11.01	Soaps for toilet use (incl. medicated)	
	3401.11.01.10	With mercury content less than or equal to 1 ppm
	3401.11.01.20	With mercury content more than 1 ppm
3401.19.00	Other	
	3401.19.00.10	With mercury content less than or equal to 1 ppm
	3401.19.00.20	With mercury content more than 1 ppm
3401.20.01	Soap in other forms	
	3401.20.01.10	With mercury content less than or equal to 1 ppm
	3401.20.01.20	With mercury content more than 1 ppm
3401.30.01	Organic surface-active products and preparations for washing the skin, in the form of liquid or cream and put up for retail sale, whether or not containing soap	
	3401.30.01.10	With mercury content less than or equal to 1 ppm
	3401.30.01.20	With mercury content more than 1 ppm

	- Sabun dan produk serta preparat aktif permukaan organik, dalam bentuk batangan, cake, potongan atau bentukan yang dicetak, dan kertas, gumpalan, kain kempa dan bukan tenunan, diresapi, dilapisi atau ditutupi dengan sabun atau deterjen :
3401.11	- - Untuk keperluan toilet (termasuk produk mengandung obat) :
3401.11.40	- - - Sabun mengandung obat termasuk sabun desinfektan
3401.11.50	- - - Sabun lainnya termasuk sabun mandi
	- - - Lain-lain, dari kain kempa atau bukan tenunan, diresapi, dilapisi atau ditutupi dengan sabun atau deterjen :
3401.11.61	- - - - Dari bukan tenunan dalam kemasan untuk penjualan eceran
3401.11.69	- - - - Lain-lain
3401.11.70	- - - Lain-lain, dari kertas, diresapi, dilapisi atau ditutupi dengan sabun atau deterjen
3401.11.90	- - - Lain-lain
3401.19	- - Lain-lain :
3401.19.10	- - - Dari kain kempa atau bukan tenunan, diresapi, dilapisi atau ditutupi dengan sabun atau deterjen
3401.19.20	- - - Dari kertas, diresapi, dilapisi atau ditutupi dengan sabun atau deterjen
3401.19.90	- - - Lain-lain
3401.20	- Sabun dalam bentuk lain :
3401.20.20	- - Kepingan sabun
	- - Lain-lain :
3401.20.91	- - - Dari jenis yang digunakan untuk memisahkan tinta pada kertas daur ulang
3401.20.99	- - - Lain-lain
3401.30.00	- Produk dan preparat aktif-permukaan organik untuk membersihkan kulit, dalam bentuk cair atau krim dan disiapkan untuk penjualan eceran, mengandung sabun maupun tidak

Proposal Secretariat dan BTKI 2022

Measuring devices

Existing code	Proposed statistical codes	Description
		Other instruments and appliances, including sphygmomanometers
9018.90.92		Devices for measuring blood pressure
	9018.90.92.10	Sphygmomanometers containing mercury
	9018.90.92.90	Other
9025.11.10		Clinical thermometers, liquid filled, for direct reading
	9025.11.10.10	Containing mercury
	9025.11.10.90	Other
9025.11.40		Liquid-filled thermometers, for direct reading, not combined with other instruments, other than clinical thermometers
	9025.11.40.10	Containing mercury
	9025.11.40.90	Other
9025.80.01		Other instruments, including barometers
	9025.80.01.10	Barometers containing mercury
	9025.80.01.90	Other
9025.80.02		Other instruments: hygrometers
	9025.80.02.10	Hygrometers containing mercury
	9025.80.02.90	Other
9026.20.10		Instruments and apparatus for pressure measurement or control, manometers
	9026.20.10.10	Manometers containing mercury
	9026.20.10.90	Other

90.18

Instrumen dan peralatan yang digunakan dalam ilmu medis, bedah, perawatan gigi atau kedokteran hewan, termasuk aparatus scintigraphic, selain aparatus elektro-medis dan instrumen penguji penglihatan.
 - Aparatus elektro-diagnostik (termasuk aparatus untuk menguji fungsi eksploratori atau untuk memeriksa parameter fisiologi) :

9018.90

- Instrumen dan peralatan lainnya :

9018.90.10

- - Lampu kepala fiber optik dari jenis yang dirancang untuk kegunaan medis

9018.90.20

- - Set pemberian intravena

9018.90.31

- - Instrumen dan peralatan elektronik :

- - - Instrumen dan peralatan elektro bedah atau elektro medis

9018.90.39

- - - Lain-lain

9018.90.90

- - Lain-lain

90.25

Hidrometer dan instrumen apung semacam itu, termometer, pirometer, barometer, higrometer dan psikrometer, dengan perekam atau tidak dan berbagai kombinasi dari instrumen tersebut.

- Termometer dan pirometer tidak dikombinasi dengan instrumen lainnya :

9025.11.00

- - Berisi cairan, untuk pembacaan langsung

9025.19

- - Lain-lain :

- - - Dioperasikan secara elektrik :

9025.19.11

- - - - Pengukur suhu untuk kendaraan bermotor

9025.19.19

- - - - Lain-lain

9025.19.20

- - - Tidak dioperasikan secara elektrik

9025.80.00

- Instrumen lainnya

9025.90.00

- Bagian dan aksesoris

Needs and Challenges in Mercury Trade

Data Availability

- Incomplete and fragmented data on mercury flows, especially in informal sectors and illegal trade routes.

Policy & Regulation Gaps

- Enforcement of existing laws is inconsistent, especially in remote or border regions.
- Limited coordination across agencies (e.g., customs, trade, environment, health).

Institutional Capacity

- Limited technical capacity and resources for inspection, monitoring, and analysis (e.g., mercury detection tools, lab testing).
- Understaffed enforcement units at local levels.

Public Awareness

- Low awareness among ASGM communities, online sellers, and local traders about mercury risks and legal prohibitions.

Needs and Challenges in Mercury Trade

Law Enforcement

- Weak surveillance in small ports and illegal border crossings.
- Prosecution of mercury-related crimes remains rare.

Online Sale

- Mercury and mercury-added products are still available via social media and e-commerce platforms despite regulations.

Control of Mercury-Added Products

- Monitoring of thermometers, batteries, lamps, and skin whitening products remains limited in rural areas.

Supply Chain Practices

- Illegal supply chains for mercury continue to operate through informal networks with regional connections.

COUNTRY PRESENTATION

MALAYSIA



COUNTRY PROFILE

Malaysia consists of 13 states (i.e., Johor, Kedah, Kelantan, Melaka, Negeri Sembilan, Pahang, Penang, Perak, Perlis, Sabah, Sarawak, Selangor and Terengganu) and 3 federal territories (i.e., Kuala Lumpur, Labuan and Putrajaya) (Figure 1.1). These states and federal territories are located in 2 separated regions, namely peninsular Malaysia and island of Borneo, and these 2 regions are separated by 640 km (or 400 miles) of the South China Sea.



Source: Department of Statistics Malaysia 2018a

Figure 2.1: Map of Malaysia

COUNTRY PROFILE

IN 2024, MALAYSIA'S GROSS DOMESTIC PRODUCT (GDP) EXPERIENCED SIGNIFICANT GROWTH, REACHING A NOMINAL VALUE OF \$444 BILLION AND A PPP (PURCHASING POWER PARITY) VALUE OF \$1.47 TRILLION. THE COUNTRY'S POPULATION WAS ESTIMATED AT 34.1 MILLION

Gross Domestic product by sector, 2022 - 2024
(at constant 2015 prices)

	Share(%)	Change(%)		
	2023 ¹	2022	2023 ¹	2024 ²
Service	59.3	10.9	5.5	5.6
Manufacturing	23.5	8.1	1.4	4.2
Agriculture	6.3	0.1	0.6	1.2
Mining	6.1	2.6	-0.8	2.7
Construction	3.6	5.0	6.3	6.8
Gross Domestic Product	100.0	8.7	~4.0³	4.0-5.0

¹ Estimate

² Forecast

³ Approximate

Note: Total may not add up due to rounding and exclusion of import duties component

Source: Statistic Department and Finance Ministry

*TheStar*graphics

COUNTRY PROFILE

TABLE 2: MAJOR EXPORT PRODUCTS (JANUARY 2025)

Products	Jan 2025 ^P	Dec 2024 ^P	Jan 2024 ^P
	RM Million	RM Million	RM Million
Total Exports	122,790.8	138,475.8	122,410.5
Electrical & Electronic Products	50,525.7	58,777.8	44,023.0
Petroleum Products	9,759.2	9,778.0	14,806.3
Palm Oil & Palm Oil Based Agriculture Products	6,688.1	8,192.4	6,150.3
Machinery, Equipment & Parts	5,921.0	6,473.2	5,491.5
Chemicals & Chemical Products	5,506.4	6,081.7	6,033.6
LNG	5,245.4	5,840.7	6,051.5
Manufactures of Metal	5,002.3	5,799.0	4,970.3
Optical & Scientific Equipment	4,242.1	5,084.4	4,897.8
Palm Oil-Based Manufactured Products	3,287.5	3,018.8	2,878.3
Processed Food	2,755.0	3,314.1	2,623.1

TABLE 4: MAJOR IMPORT PRODUCTS (JANUARY 2025)

Products	Jan 2025 ^P	Dec 2024 ^P	Jan 2024 ^P
	RM Million	RM Million	RM Million
Total Imports	119,157.2	119,342.1	112,238.0
Electrical & Electronic Products	46,315.7	42,629.6	32,884.6
Machinery, Equipment & Parts	9,714.7	10,762.5	8,906.4
Petroleum Products	9,109.9	9,776.2	11,712.9
Chemicals & Chemical Products	7,749.3	8,311.2	8,885.7
Manufactures of Metal	5,606.2	5,885.4	6,817.3
Transport Equipment	4,417.4	5,029.4	4,148.3
Crude Petroleum	4,181.8	4,118.9	5,437.7
Processed Food	2,516.1	2,866.6	3,017.6
Iron & Steel Products	2,499.7	2,599.1	3,273.1
Optical & Scientific Equipment	2,469.0	3,050.4	2,694.4

LEGISLATION FRAMEWORK



The Chemical Governance Committee



Chaired by the Minister of Natural Resources and Environmental Sustainability



Secretariat : Ministry of Natural Resources and Environmental Sustainability (NRES)



Objective : To establish a coordinated and cross-sectoral approach to chemical management, promoting good practices for safe and sustainable chemicals management

LEGAL FRAMEWORK AND MERCURY TRADE CONTROL

MINISTRY OF NATURAL RESOURCES AND ENVIRONMENTAL SUSTAINABILITY (NRES)

- THE PRIMARY DEPARTMENT RESPONSIBLE FOR REGULATING MERCURY IS THE NATURAL RESOURCES AND ENVIRONMENTAL SUSTAINABILITY (NRES). THEY ARE INVOLVED IN THE IMPLEMENTATION OF THE [MINAMATA CONVENTION ON MERCURY](#), A GLOBAL AGREEMENT AIMED AT PROTECTING HUMAN HEALTH AND THE ENVIRONMENT FROM THE HARMFUL EFFECTS OF MERCURY. NRES OVERSEES THE NATIONAL STEERING COMMITTEE ON MERCURY, WHICH IS RESPONSIBLE FOR COORDINATING EFFORTS TOWARDS IMPLEMENTING THE CONVENTION IN MALAYSIA.

MINISTRY OF HEALTH (MOH)- REGULATES MERCURY IN MEDICAL DEVICES AND PROTECTS PUBLIC HEALTH.

MINISTRY OF INTERNATIONAL TRADE AND INDUSTRY (MITI)-OVERSEES INDUSTRIAL/TRADE POLICY; MANAGES MERCURY-RELATED CHEMICAL TRADE

MINISTRY OF DOMESTIC TRADE AND COSTS OF LIVING (KPDN)-ENFORCES CONSUMER PROTECTION ACT; SETS PRODUCT SAFETY STANDARDS

DEPARTMENT OF OCCUPATIONAL SAFETY AND HEALTH (DOSH)- MONITORS MERCURY EXPOSURE IN WORKPLACES.

DEPARTMENT OF ENVIRONMENT (DOE)-MONITORS MERCURY EMISSIONS AND WASTE UNDER ENVIRONMENTAL QUALITY ACT 1974

DEPARTMENT OF AGRICULTURAL (DOA)-REGULATES MERCURY CONTAINING PESTICIDES

DEPARTMENT OF MINERAL AND GEOSCIENCE (JMG)-OVERSEES MINING AND MINERAL-RELATED MERCURY REGULATIONS

ROYAL MALAYSIAN CUSTOMS DEPARTMENT (CUSTOMS)- CONTROLS IMPORT/EXPORT OF MERCURY AND CONDUCTS INSPECTIONS AND SEIZURES.

LEGAL FRAMEWORK AND MERCURY TRADE CONTROL

LEGISLATIVE AND REGULATORY MEASURES

- **ENVIRONMENTAL QUALITY ACT 1974 (EQA):** MAIN LEGISLATION ADDRESSING POLLUTION, INCLUDING MERCURY MANAGEMENT UNDER THE DEPARTMENT OF ENVIRONMENT (DOE).
- **CUSTOMS (PROHIBITION OF IMPORTS) ORDER 2023 AND CUSTOMS (PROHIBITION OF EXPORTS) ORDER 2013:** REGULATES IMPORT/EXPORT OF MERCURY AND MERCURY-ADDED PRODUCTS.
- **POISON ACT 1952:** MERCURY IS CLASSIFIED UNDER SCHEDULED POISONS AND REQUIRES LICENSING FOR HANDLING.

TRADE RESTRICTIONS

- MALAYSIA BANNED THE IMPORT, EXPORT, AND MANUFACTURE OF SEVERAL MERCURY-ADDED PRODUCTS (THERMOMETERS, SPHYGMOMANOMETERS, BATTERIES, SWITCHES) AS OF 2020, IN COMPLIANCE WITH ANNEX A OF THE MINAMATA CONVENTION.
- MALAYSIA DOES NOT PRODUCE PRIMARY MERCURY BUT IMPORTS FOR INDUSTRIAL USE (E.G., CHLOR-ALKALI, SMALL-SCALE GOLD MINING IN THE REGION).

LEGAL FRAMEWORK AND MERCURY TRADE CONTROL

ENFORCEMENT

- ROYAL MALAYSIAN CUSTOMS DEPARTMENT (RMCD) MONITORS AND CONTROLS MERCURY TRADE AT POINTS OF ENTRY.
- INSPECTIONS, SEIZURES, AND PROSECUTION ARE CONDUCTED FOR NON-COMPLIANT SHIPMENTS, INCLUDING UNDECLARED OR MISLABELED MERCURY.
- [P.U.\(A\)128- PERINTAH KASTAM \(LARANGAN MENGENAI IMPORT\) PINDAAN 2024.PDF](#)

NATIONAL SITUATION OF TRADE OF MERCURY, MERCURY COMPOUNDS AND MERCURY ADDED PRODUCTS

ILLEGAL TRADE AND TRANSBOUNDARY MOVEMENT

- SMUGGLING OF MERCURY CONTINUES DUE TO ITS DEMAND IN ARTISANAL AND SMALL-SCALE GOLD MINING (ASGM) IN THE REGION.
- MALAYSIA IS BOTH A TRANSIT AND DESTINATION COUNTRY, INCREASING THE COMPLEXITY OF ENFORCEMENT.
- THERE IS INCOMPLETE DATA ON MERCURY USE ACROSS INDUSTRIES, ESPECIALLY IN MEDICAL WASTE, E-WASTE, AND ARTISANAL ACTIVITIES
- LACK OF NATIONAL MERCURY MONITORING AND INVENTORY HINDERS EFFECTIVE POLICY IMPLEMENTATION.
- LIMITED CAPACITY IN DETECTION TECHNOLOGIES, WASTE MANAGEMENT INFRASTRUCTURE, AND TRAINED PERSONNEL.
- ENFORCEMENT AGENCIES NEED GREATER COORDINATION, DATA SHARING, AND TECHNICAL KNOWLEDGE ON MERCURY HANDLING.

MERCURY TRADE INFORMATION AND REPORTED CASE OF ILLEGAL TRADE OF MERCURY

EXPORTS	TOP DESTINATION	SHARE OF MY IN GLOBAL EXPORTS	IMPORTS	TOP ORIGIN	SHARE OF MY IN GLOBAL IMPORTS
\$5.73k	Laos	0.013%	MYR20.5k	Germany	0.05%
Ranking 4,145 / 4,393 (2023)	\$5.73k (2023)	Ranking 38 / 58 (2023)	Ranking 5,126 / 5,342 (Mar 2024 - Feb 2025)	MYR9.86k (Mar 2024 - Feb 2025)	Ranking 39 / 93 (2023)

❑ IN 2024, MALAYSIA IMPORTED MYR 17.6K OF MERCURY, WITH THE MAIN SOURCES BEING GERMANY, INDIA, SINGAPORE, THE UNITED STATES, AND SOUTH KOREA. IN 2023, MALAYSIA EXPORTED \$5.73K OF MERCURY, PRIMARILY TO LAOS.

Source: <https://oec.world/en/profile/bilateral-product/mercury/reporter/mys>

❑ ILLEGAL TRADE OF MERCURY IS NOT HAD RECORDED SINCE 2022 UNTIL NOW IN MALAYSIA.

HS CODES FOR MERCURY ADDED PRODUCTS

No.	Item	Hs Code
1	Mercury	2805.40 000
2	Amalgam	2843.90 000
3	Inorganic and organic compounds of mercury (exclude amalgam)	2852.10 000, 2852.90 000
4	Organo-mercury compounds	2852.10 000, 2852.90 000
5	Dental alloy containing mercury	3006.40 110

Source: https://www.customs.gov.my/en/pg/Pages/pg_prthkastam.aspx

NEEDS/CHALLENGES

ONGOING AND PLANNED INITIATIVES

- ❑ NATIONAL ACTION PLAN ON MERCURY MANAGEMENT: A COMPREHENSIVE STRATEGY UNDER DEVELOPMENT TO GUIDE LONG-TERM CONTROL.
- ❑ PHASING-OUT PROJECTS: TARGETED INITIATIVES TO PHASE OUT MERCURY IN HEALTHCARE AND INDUSTRY.
- ❑ CAPACITY-BUILDING AND TRAINING: WORKSHOPS FOR CUSTOMS, HEALTH, AND ENVIRONMENTAL OFFICIALS.
- ❑ REGIONAL COOPERATION: MALAYSIA PARTICIPATES IN ASEAN AND UN ENVIRONMENT MERCURY-RELATED CAPACITY-BUILDING AND ENFORCEMENT COORDINATION

NEEDS/CHALLENGES

MALAYSIA HAS MADE NOTABLE PROGRESS IN ALIGNING ITS MERCURY MANAGEMENT WITH THE MINAMATA CONVENTION THROUGH REGULATORY BANS, CUSTOMS ENFORCEMENT, AND INSTITUTIONAL DEVELOPMENT. HOWEVER, PERSISTENT CHALLENGES SUCH AS ILLEGAL TRADE, LIMITED TECHNICAL CAPACITY, AND INSUFFICIENT DATA CALL FOR:

- ❑ STRENGTHENED INTER-AGENCY COORDINATION;
- ❑ ENHANCED MERCURY MONITORING AND NATIONAL INVENTORY SYSTEMS;
- ❑ INVESTMENT IN MERCURY-FREE TECHNOLOGIES AND ALTERNATIVES;
- ❑ CONTINUED PUBLIC AWARENESS CAMPAIGNS AND REGIONAL COLLABORATION.

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products (3–4 June 2025)

Maldives – Country Presentation

Country Profile

- Situated in the central part of the Indian Ocean
- Consists of approximately 1,190 low-lying coral reef islands that form 26 natural atolls
- Total population: Approximately 568,362, dispersed across 187 inhabited islands, ~2/3 in Greater Male' Region
- Total area over 90,000 sq kms, over 99% ocean = high dependence
- Economy heavily depends on tourism and fisheries
- Low exports (mainly fish/fish products), high dependence on imports for most economic activities



National Situation of Trade of mercury, mercury compounds and mercury added products

- Only source of mercury in the Maldives: **Import and transboundary pollution**
 - No mining, manufacturing or production of mercury/mercury added products
- Mercury containing products **imported** into the Maldives (**Minamata Initial Assessment, 2019**)
 - Batteries, Compact fluorescent lamps, Dental amalgam, Thermometers, Sphygmomanometers, mercury-preserved paints, and some cosmetics
- Mercury products have been **phased out from the health sector**
 - Report indicated that dental amalgam is kept in select hospitals for emergency use
- Mercury release sources (Minamata Initial Assessment, 2019):
 - 84% from 'waste incineration and open waste burning'
 - 15% from 'use and disposal of other products'
- Mercury **waste**: import is illegal, export requires **EPA consent and Basel PIC procedure**
 - EPA records does not show any mercury waste exports = stockpiles exist/waste mixed in landfills/**potentially exported without consent**
 - Lack of proper **hazardous waste management** facilities or capacity (interim hazardous waste storage facility has been built)

National Situation of Trade of mercury, mercury compounds and mercury added products

Issues:

- Limited **awareness** in the public and businesses on mercury sources/products and health impacts
- Limited capacity in **regulatory agencies**, eg. Customs, EP
- **No HS codes specifically for any mercury** added products (except under 8539): difficult to track mercury/added product imports, likelihood of mercury added products entering the country – **unlabelled/undetected**

8539	ELECTRIC FILAMENT OR DISCHARGE LAMPS, INCLUDING SEALED BEAM LAMP UNITS AND ULTRA-VIOLET OR INFRA-RED LAMPS; ARC-LAMPS; LIGHT EMITTING DIODE (LED) LAMPS.	853931	FLUORESCENT, HOT CATHODE	8539310000	DISCHARGE LAMPS, OTHER THAN ULTRA-VIOLET LAMPS, FLUORESCENT, HOT CATHODE
		853932	MERCURY OR SODIUM VAPOUR LAMPS; METAL HALIDE LAMPS	8539320000	MERCURY OR SODIUM VAPOUR LAMPS; METAL HALIDE LAMPS
		853939	OTHER	8539390000	DISCHARGE LAMPS, NOT ULTRA-VIOLET LAMPS, MERCURY OR SODIUM VAPOUR LAMPS NES

- Risks of illegal trade, particularly through **misdeclarations or concealed shipments**
- Wide use of **skin lightening products**, many of which are sold in informal markets and/or by small businesses online – lack of data on whether these SLPs comply with the 1<ppm mercury guideline

Legal Framework and mercury trade control

- **No overarching legislation** exists: The Ministry of Tourism and Environment is in the process of developing a law to align with the obligations of the chemicals conventions including Minamata convention
- The Ministry of Tourism and Environment is responsible for the Minamata Convention (MIA, Ratification, etc): Maldives ratified the Minamata Convention in late 2024
- Hazardous Chemicals Regulation: Hazardous chemicals can only be imported with a permit through the online MAKUDI system managed by the Ministry of Defense
- Mercury Free Policy for Health Care 2018 (Policy /23-MOH/2018/01): Hg products phased out from healthcare facilities
- Waste Management Regulation (2013/R-58): Hg waste import is illegal, export/treatment/recycling requires EPA consent
- Export-Import Act of the Maldives (Act No. 31/79): primary legal framework governing the import and export of goods in the Maldives. This Act outlines the procedures and duties rates.
- Environment Protection and Preservation Act – Law No.4/93

Mercury trade information and reported case of illegal trade of mercury

- No HS codes for mercury: difficult to track imports of mercury/mercury added products
- No seizure reports specific to mercury reported by Customs
- In case of illegal import and seizure: products will be inspected and documented by Customs and stored at their warehouse with protective measures if necessary
- No export permits records by EPA for mercury exports
- As hazardous waste cannot be properly managed in Maldives: export is the main method recommended for eliminating hazardous substances

Needs

- Legislative strengthening
- Define obligations and roles of different institutions in controlling and monitoring mercury and mercury-containing products
- Strengthen coordination and communication between enforcement agencies
- Capacity building for law enforcement to identify mercury added products
- Improve imports data: introduce sub classification within the HS codes to capture Hg products.
- Better regulate cosmetics sector, particularly the small/informal markets
- Develop and gazette national list of banned consumer products containing mercury
- Public awareness on mercury added products, exposure, harms
- Awareness targeting businesses and importers

Ongoing efforts:

- Legislation being developed
- Mercury exposure study ongoing – hair mercury study
- Awareness activities planned following the hair study



Sub-Regional Customs Training to Enhance Monitoring of Trade of Mercury Based Products

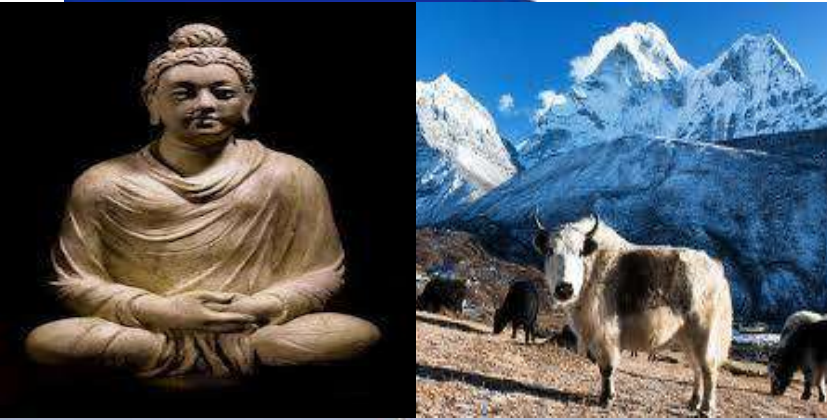
3-4 June, 2025
Colombo, Srilanka

COUNTRY PROFILE: NEPAL

Presented by:
Manoj Nidhi Wagle, SDC
Department of Customs
&
Team Nepal

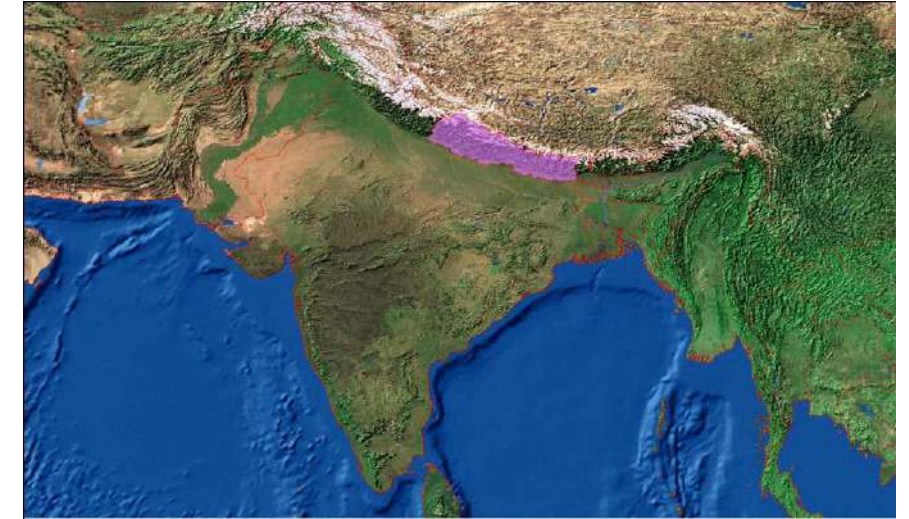
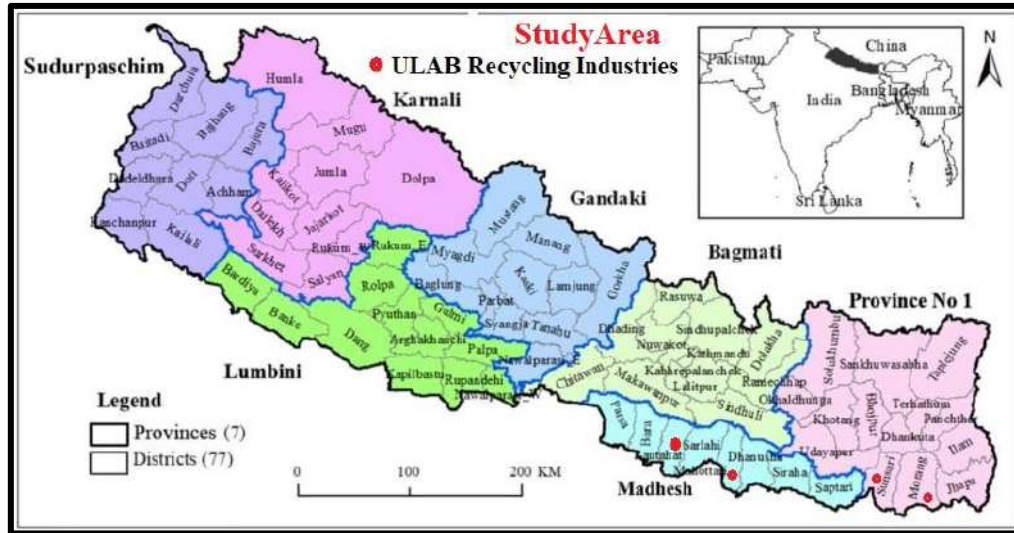


Country Profile: Facts



- ❖ The lap of the highest mountain Mount [Everest](#). (8 of the 10 highest mountains in the world)
- ❖ The Holy Land, the birthplace of the "light of Asia", Lord Buddha.
- ❖ A country of unity and also great diversity of ethnicity, culture and religions, living peacefully together, respecting each other's beliefs.
- ❖ Flourish with 124 ethnic groups of people having separate languages, Scripts and cultures
- ❖ Wide bio-diversity, one-horned rhinos, Bengal tigers, elephants, sloth bears and many other animals and birds.
- ❖ Nepal is a culturally and religiously diverse land, majority are Hindus, followed by Buddhists.
- ❖ Popular tourist destination due to its natural beauty and cultural heritage.
- ❖ [Human Resources](#), Agricultural products, Medicinal Herbs, Tourism and Green energy are strengths of economy.
- ❖ Limestone is a major explored mineral Source.

Federal Democratic Republic of Nepal



Physiographic Region	Area (Km2)	Percent	No. of Districts	Population (based on 2021 Census)
Mountain	51817	35.2 (15% snow covered)	16	17,72,948 (6.08%)
Hill	61345	41.7	40	1,17,57,624(40.31%)
Terai	34019	23.1 (17% flat)	21	1,56,34,006(53.61%)
Total	147181	100	77	2,91,64,578

Trade of mercury, mercury compounds and mercury added products

- Mercury- based **pesticides** is restricted and controlled.
- Mercury-based **medical instruments and Dental amalgam** are controlled.
- No known case or Seizure for Mercury waste.
- **PIC procedure: In case of Pesticides**
- Mercury-added products like cosmetics are not controlled, but voluntary Nepal Standards for a wide range of products like lipsticks, whitening cream have been formulated.

Legal Framework and mercury trade control

- Constitution of Nepal 2015: Right to Live in a Healthy Environment and Right to Health.
- Environment Protection Act 2019 and Environment Protection Regulation 2020 define Pollution as "'Pollution" means the activities that significantly degrade, damage the environment or harm the beneficial or useful purpose of the environment, by changing the environment directly or indirectly as a result of wastes, chemical, heat, noise, electrical, electro-magnetic wave or radioactive ray.
- EPA has the right to restrict the IESU ban environment pollutants.
- MoHP decided not to use Mercury-Based Medical Equipment and Dental Amalgam in Health facilities and Health Institutions.



Office Seal

Government of Nepal

Ministry of Health and Population

(Quality Standard and Regulation Division)

4262596
4262802
4262706
4262935
4262862
4223580

Ramshah Path
Kathmandu, Nepal

Received Ref. No.:
Ref. No.: 076/77
Dispatch No.: 02/72

Date: 2076/05/15 BS
(September 01, 2019 AD)

Subject: Regarding Mercury based Equipments and Dental Amalgam

M/s Ministry of Forest and Environment, Singhdurbar, Kathmandu
M/s Ministry of Social Development, all seven provinces
M/s Department of Health Services, Teku
M/s Department of Drug Administration, Bijulibajar
M/s Department of Ayurveda and Alternative Medicine, Teku
M/s Nepal Dental Association, Balkumari, Lalitpur
M/s Association of Private Health Institution Nepal (APHIN), Jwagal, Lalitpur
M/s Tribhuvan University, Kirtipur
M/s Patan Academy of Health Sciences, Lalitpur
M/s B.P. Koirala Institute of Health Sciences, Dharan
M/s Council of Technical Education and Vocational Training (CTEVT)

With reference to above mentioned subject, it is hereby requested as per the decision of Government of Nepal (Hon. Deputy Prime Minister & Minister for Health and Population Level) dated 2076/05/04 BS (August 21, 2019 AD) to implement and make to implement the following decisions regarding Mercury based Equipments and Dental Amalgam.

1. Complete ban the use of mercury dental amalgam in pregnant and breast feeding women and children below 15 years.
2. Ban the use of (Mercury Dental Amalgam) in other age group of people within five years upon available of alternatives.
3. Amend the curriculum from the use of mercury dental amalgam itself of Institution providing dental health education under Universities and Academies.
4. Ban using of mercury dental amalgam in practical exercise.

MOHP initiation to Reduce Mercury Based
Equipment and Dental Amalgam

International Award to Government of Nepal

- Successful Mercury Free Dentistry Policy adoption as a result of the research-based policy of Nepal won the Future Policy Award 2023 during ICCM5, 2023, in Bonn Germany from WFC (World Future Council).
- Future Policy Award 2023 awarded to the Government of Nepal



Mercury Free Dentistry Policy of Nepal won the Future Policy Award 2023, ICCM5 from WFC.

Nationwide Compliance Monitoring of MFHCFs and MFD Policy (CEPHED-GON, MOHP & WHO, 2023)

Mercury Free Health Care Facilities (MFHCFs)

- 92.85% of HCFs were found not to be using mercury thermometers.
- None of the HCFs found to be using Mercury Sphygmomanometer
- 73.8% were found to be known about the government's decision

Mercury Free Dentistry (MFD)

- 93.62% of Dental Health Care facilities (DHCF) were found to be shifted to mercury-free alternative
- 93.62% of the DHCF are aware of GON Mercury Free Dentistry decisions

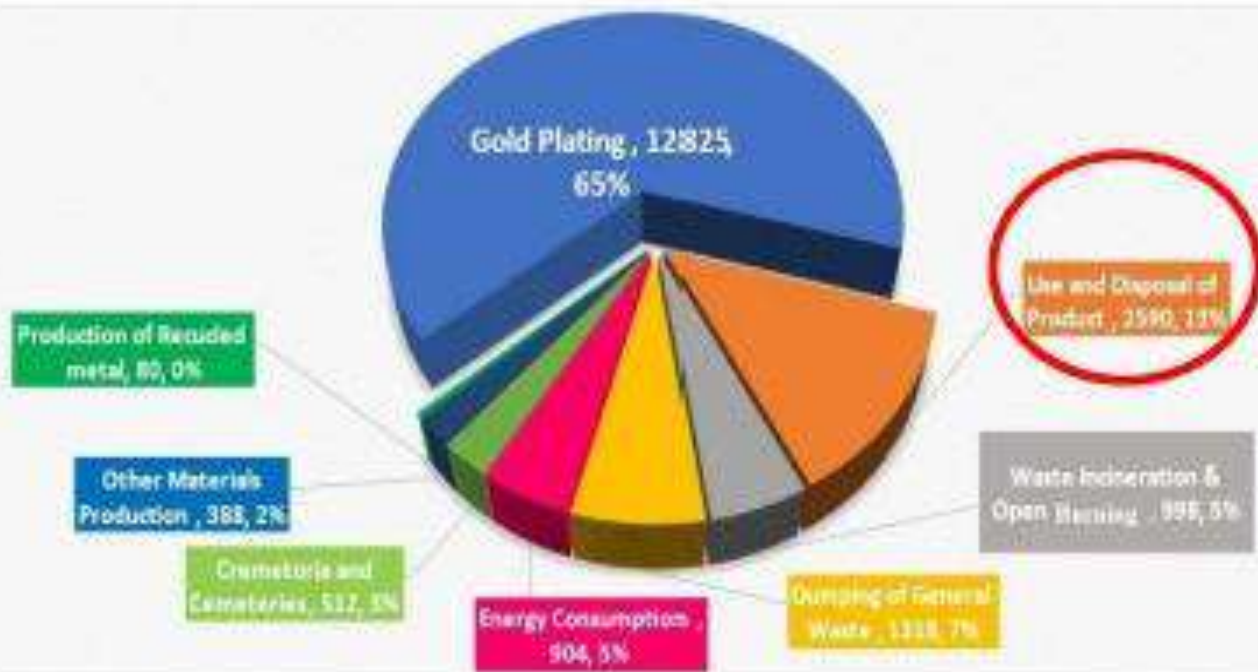
Status toward ratification to the Minamata Convention

- Signed in 2013
- GON has prepared the Minamata Convention Initial Assessment (MIA) Report in 2019
- Prepared for the Ratification of the Convention
- Prepared the detailed study report required by the national legal provision for ratification.

Minamata Convention Initial Assessment (MIA) Report 2019

https://minamataconvention.org/sites/default/files/documents/minamata_initial_assessment/Nepal_MIA_2019.pdf

Sources Contributing to Mercury Release (Kg Hg/Yr., %), MOFE, MIA 2019



- **Gold Plating** – 12,825 Kg (65%)
- **Use and Disposal of Product** – 2,590 Kg (13%)
- **Dumping of General Waste** – 1,318 Kg (7%)
- **Waste Incineration & Open Burning** – 998 Kg (5%)
- **Energy Consumption** – 904 Kg (5%)
- **Crematoria and Cemeteries** – 512 Kg (3%)
- **Other Materials Production** – 388 Kg (2%)
- **Production of Recycled Metal** – 80 Kg (0%)

Mercury trade information and reported case of illegal trade of mercury

				(Import Value and Imports Revenue are in Rs. Thousands)	
HSCode	Description	Unit	Quantity	Imports_Value	Imports_Revenue
28054000	Mercury	Kg	3	83	17
85393200	Mercury or sodium vapour lamps; metal halide lamps	PCS	5110	1376	492
85393900	Discharge lamps, other than ultra-violet lamps, mercury or sodium vapour lamps,	PCS	32524	3739	1360

Mercury trade information and reported case of illegal trade of mercury

- evidence of illegal trade of mercury (place, weight, year) if any.
(e.g. year, weight, place, summary of data).
 - NO SEIZURE DATA yet
- Customs existing procedures for sound handling of seized commodities, including mercury, mercury added products and mercury waste.
 - Authority to prohibit or control the exportation or importation of any goods notified order in the Nepal Gazette:
 - Customs Act/Regulation
 - Customs Tariff Act/Regulation

Needs/Challenges

- Ratification of the Convention
- Trade Regulation Mechanism
 - Legal
 - Technology
- Tracking the mercury-based products and wastages



THANK YOU!



BAGONG PILIPINAS



COUNTRY PRESENTATION

Sub-regional Customs Training
to Enhance Monitoring of Trade of Mercury and Mercury Compounds



BAGONG PILIPINAS

ORDER OF PRESENTATION

- 1 **Brief Overview of Mercury Trade in the Philippines**
- 2 **Philippines' Commitment and Legal Framework**
- 3 **Border Control and Customs Seizures**
- 4 **Challenges in Enforcement**
- 5 **Ongoing Efforts and International Cooperation**



Brief Overview

**Historical Context: Widespread use
Mercury in artisanal small-scale gold**



A Paracale (Camarines Norte) miner panning for gold. On a visit in 2010, the mercury level was so high that Ban Toxics' instruments could not measure it

Philippines' Commitment and Legal Framework

The Minamata Convention: a binding international treaty (2013) to phase out mercury



The Philippines, represented by then Environment Secretary Ramon Paje, became a signatory to the historic Minamata Convention on Mercury on Friday, October 11, 2013 signifying the country's willingness to reduce and eventually phase out the highly-toxic chemical mercury.

Philippines' Commitment and Legal Framework



Revised Chemical Control Order (DENR Administrative Order 2019-20): Regulates mercury and its compounds.



Department of Health Administrative Order No. 2020-0020: *Phases out dental amalgam containing mercury.*



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Philippines' Commitment and Legal Framework



Food and Drug Administration (FDA) Circular No. 2022-003: *Banning all mercury-added thermometers, sphygmomanometers, and dental amalgam capsules.*



Periodic bans on mercury-containing skin-lightening products - banned over 135 skin whitening products for containing mercury

Border Control and Customs Seizures



The **Bureau of Customs (BOC)**, under the auspices of the **Department of Finance (DOF)**, plays a crucial role in the Philippines by regulating the flow of goods across its borders, ensuring compliance with laws, and collecting lawful revenues.



BAGONG PILIPINAS

Overview

VISION

A modernized and credible Customs administration that upholds good governance and is among the world's best.

MISSION

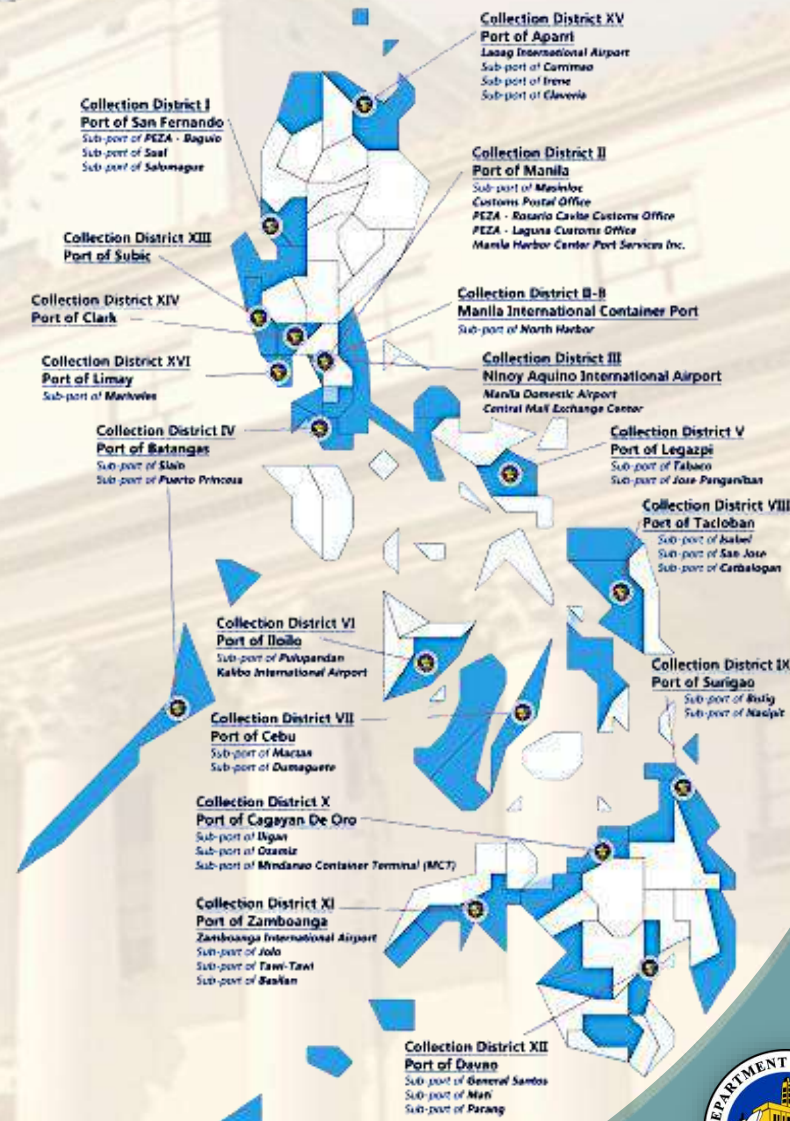
To enhance trade facilitation, strengthen border control, and improve collection of lawful revenues

CORE VALUES

Professionalism
Excellence
Integrity
Accountability



BUREAU OF CUSTOMS PORTS AND SUB-PORTS



Border Control and Customs Seizures

Significant Seizure - a year after signing the treaty



*MANILA, Philippines – The Bureau of Customs (BOC) Tuesday, December 23, busted 7 container vans from China misdeclared as paper utensils and T-shirts. But the cargoes, which one of them inspected, apparently contained **360 kilos of mercury estimated to cost P1.8 million (\$40,277.47)**, and various painkillers, apart from knock-off footwear and apparel.*

Border Control and Customs Seizures

From 2020 to 2024, the BOC apprehended several shipments of mercury-containing cosmetics and beauty products in different Ports of Entry

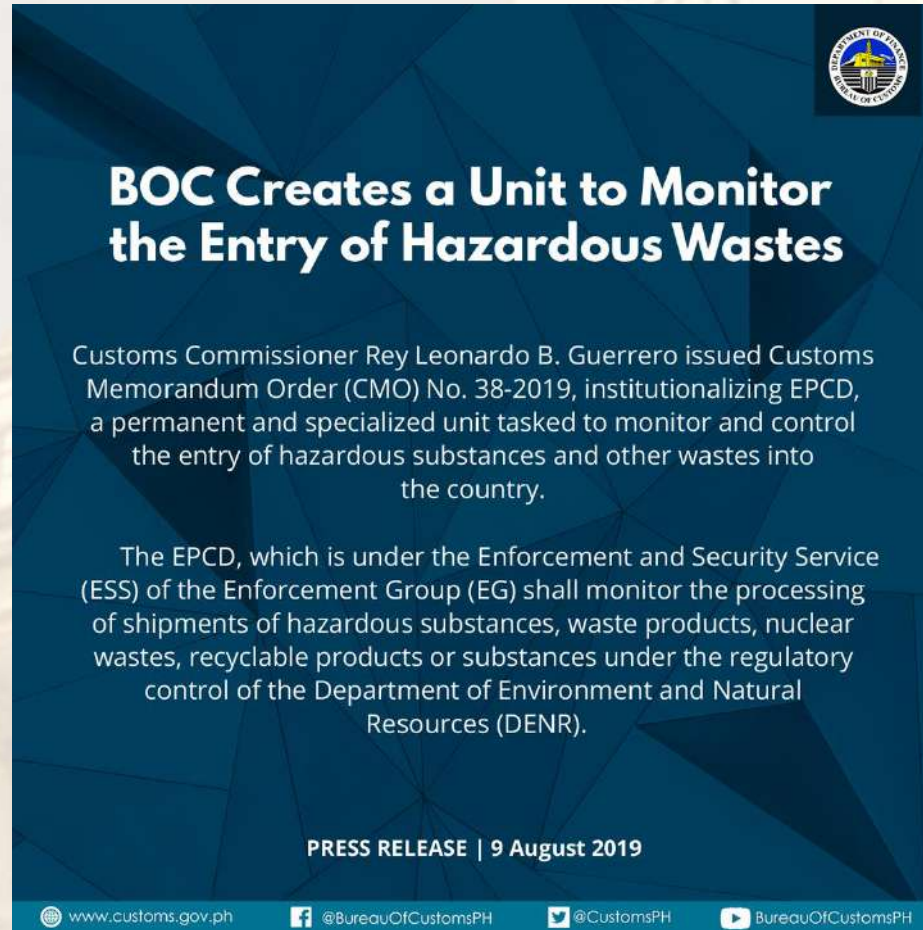


BOC-NAIA destroyed another 1.5 tons of various seized imported goods including an estimated 400 kilograms of Goree beauty products on June 11, 2020 in Trece Martires, Cavite.

Under FDA Advisory No. 2017-289, the use and distribution of Goree products which were found to contain toxic mercury levels beyond the limit set by the agency are strictly prohibited.

Border Control and Customs Seizures

BOC Creates a Unit to Monitor the Entry of Hazardous Wastes

A blue graphic with a geometric pattern and a small BOC logo in the top right corner. It contains the title, a paragraph about the creation of the EPCD unit, a paragraph about its functions, and social media links at the bottom.

BOC Creates a Unit to Monitor the Entry of Hazardous Wastes

Customs Commissioner Rey Leonardo B. Guerrero issued Customs Memorandum Order (CMO) No. 38-2019, institutionalizing EPCD, a permanent and specialized unit tasked to monitor and control the entry of hazardous substances and other wastes into the country.

The EPCD, which is under the Enforcement and Security Service (ESS) of the Enforcement Group (EG) shall monitor the processing of shipments of hazardous substances, waste products, nuclear wastes, recyclable products or substances under the regulatory control of the Department of Environment and Natural Resources (DENR).

PRESS RELEASE | 9 August 2019

www.customs.gov.ph @BureauOfCustomsPH @CustomsPH BureauOfCustomsPH



BAGONG PILIPINAS

Challenges in Enforcement

Smuggling routes via boats and backdoor channels



Balikbayan boxes (personal effects and household goods) as smuggling channels

Ongoing Efforts and International Cooperation

Promotion of Mercury-free Technologies



Despite the Philippines' ban on mercury, some goldminers still use the toxic metal to separate gold. In the PlanetGold method, seen here, the ore is crushed and the gold separated mechanically, using no mercury and far less cyanide

Collaboration with NGOs and International Partners



The Philippine Healthcare and Mercury Wastes Management (HCW) Project officially began its five-year implementation with a workshop on January 31, 2025, involving over 100 stakeholders from hospitals, waste facilities, government agencies, and partners. Launched in December 2023 and supported by UNIDO, DENR-EMB, and GEF funding, the project aims to reduce toxic healthcare waste, including mercury, promoting environmental safety and sustainable healthcare practices in the Philippines.

End of Presentation
THANK YOU



DEPARTMENT OF FINANCE
**BUREAU OF
CUSTOMS**
(02) 8705-6000

boc.cares@customs.gov.ph 

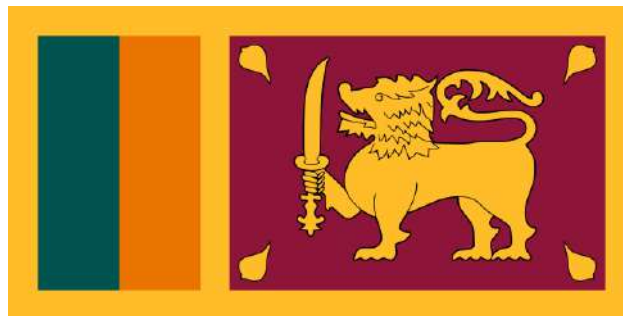
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COUNTRY PROFILE : SRI LANKA

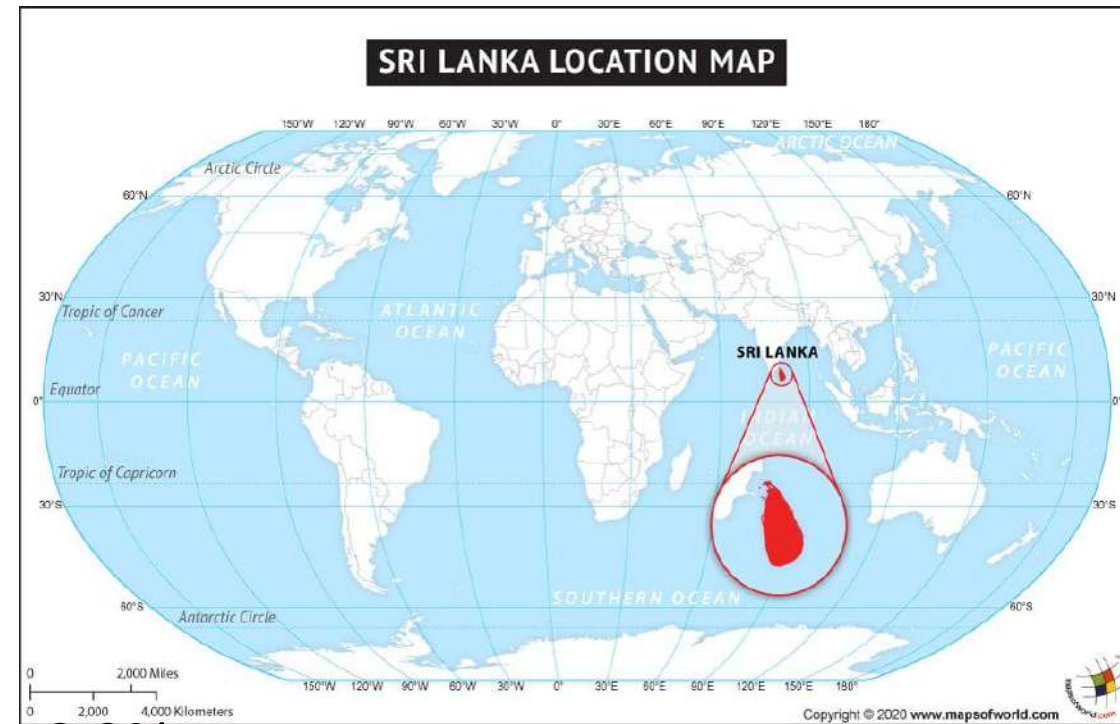
Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury and Mercury Compounds

3 -4 June 2025

Colombo

Geographical and Socio - economic Information

- ▶ Land area : 65,610 Km²
- ▶ Coast line : 1,585 Km
- ▶ 9 Provinces and 25 Districts
- ▶ Population : 22.07 million
- ▶ Pop. density : 323/km²
- ▶ Ethnic Groups: Sinhala 74.88%, Tamil 11.2%, Muslim 9.2%, Other 4.72%
- ▶ Gross Domestic Product (2022): Rs.24.147 trillion
- ▶ GDP structure
 - Agriculture - 8.7%
 - Industry - 30.3 %
 - Services - 56.1%
 - Taxes less subsidies on products – 4.9%



Minerals in Sri Lanka

- Sri Lanka possesses an abundance of non metallic mineral resources.



- Many of Sri Lanka's minerals are renowned worldwide for their high purity.
- Primary mining does not exist in Sri Lanka.
- Domestic demand of mercury is totally met through imports.

National Situation on Mercury

Minamata Convention in Sri Lanka

- Date of Signature : 08th October 2014
- Date of Ratification : 19th June 2017
- National Focal Point : Ministry of Environment

Use of Mercury in Sri Lanka

Industry Sector

- Small Scale Jewellery Manufacturing Sector

Health Sector

- Use of Dental amalgam
 - Reduce since 2013 and replace with composite fillings
- Mercury containing medical devices
 - Many hospitals have switched to digital alternatives
- Mercury added medication – Ayurveda & Homeopathy drug preparations

Education Sector

- Schools / Universities / Education institutions use metallic mercury mainly as a reference metal to study the physical characteristics
- Metallic mercury is used in experimental apparatus

Mercury Inventory/Mass Flow

- National Inventory on Mercury Emissions and Releases (2017) developed under Minamata Initial Assessment Project
- The inventory was developed accordance with UNEnvironment's "Toolkit for identification and quantification of Mercury Releases", guideline for inventory level 1
- Based on mass balances for each mercury release source type
- Industry, Health and Education sectors were considered

Major Sources of Mercury in Sri Lanka

Major sources of releases and emissions of mercury are anthropogenic.

- Use and disposal of mercury-added products (4,418 kg Hg/year or 58%)
- Waste incineration and open waste burning (1,229 kg Hg/year or 16%)
- Combustion of coal, other fossil fuels and biomass (742 kg Hg/year or 10%)
- Informal dumping of general waste (396 kg Hg/year or 5%)
- Application, use and disposal of dental amalgam fillings (331 kg Hg/year or 4%)

The estimated total mercury input to society in Sri Lanka is 7,630 kg/year.

(National Mercury Inventory, 2016 - MIA, Sri Lanka)

Legal Framework on Mercury and Mercury added Products

- Pesticides containing Mercury compounds were regulatory banned in 1987 and legally banned in 2001 by the Extraordinary Gazette No. 1190/24 of 29/06/2001 under the control of pesticides act No. 33 of 1980
- import of waste and scrap of the rare earth metals including mercury classified in HS code 2805.30.10 is controlled under the Special Import License and Payment Regulations, Extraordinary Gazette No. 1813/14 dated 05/06/2013 now amended by Extraordinary Gazette No. 2312/77 dated 01.01.2023.
- Emission , Disposal and Management of industrial and domestic waste regulated by the National Environmental Act (NEA)
 - ▶ Under the NEA there are 2 major regulations related to the Hg Waste Management
 1. Regulation published in the Gazette Notification No.2264/17 of 27/01/2022-EPLs
 2. Regulation published in the Gazette Notification No.1534/18 of 01/02/2008 –SWML
- In order to obtain the EPL, waste water generated from them should be conformed to the standards stipulated in the Environment Quality Regulations published in the Gazette Notification 2264/17 of 27/01/2022.

Legal framework cont....

- According to the Standards ,Hg level in the Industrial waste water should be below than **0.001 mg/1**
- Therefore all the waste water generated from these industries should be purified or treated up to the standards before discharge in to the environment
- According regulation No.1534/18 of 01/02/2008 Hg is scheduled as a Hazardous waste . Therefore in order to handle this waste a SWML should be obtained from CEA. In order to obtain this license Hg Waste should be handled environmental safe manner until the final disposal
- Guidelines regarding management of Mercury in the health sector (Issued by Ministry of Health, dated 24-01-2013)
 - procure non mercury thermometers and phase out use of mercury in health ministry
 - procure non mercury aneroid sphygmomanometers and phase out use of mercury containing sphygmomanometers
- Consumer Affairs Authority regulates the presence of heavy metals in cosmetics products with specified maximum permissible limits. For example, the CAA has issued notifications outlining limit for mercury in skincare products, with permissible maximum limits of 1mg per kg.
- Sri Lanka Standard SLS 743:2014 for the maximum permissible limit for Hg in Cosmetics is 1 ppm

Cases of Illegal trade or imports

- The Consumer Affairs Authority (CAA) conducted raids uncovering body lotions in the market with mercury concentrations up to 30,000 times the permissible level.
- Some imported skincare products have high concentrations of Hg
- Consignee bringing undeclared cosmetics without getting NMRA approval prior to the Importation.
- Some Canned fish imports have rejected by SLSI because of the Hg Contained.

HS codes for mercury and mercury added products

	HS Code	Description	Status
1	2805.40.00	Mercury (Elemental, Metallic Hg)	Not Control
2	2852.10.00	Inorganic or organic compounds of Hg whether or not chemically defined (excluding amalgams)	Control by ICL
3	3006.40.00	Dental amalgams	Not control
4	3304.99.00	Skincare products	Control by ICL
5	8539.31.00	Florescent lamps	Not control
6	8539.31.10	Energy efficient AC compact florescent lamps	Control

HS Codes cont....

	HS Code	Description	Status
7	8539.31.20	12V DC florescent lamps	Not control
8	8549.31	Hg containing waste	Control
9	9025.11.00	Liquid filled thermometers (Hg or alcohol)	Not control
10	9018.90	Other instruments (ex: Sphygmomanometers etc) No specific HS code	Not control

- New HS sub codes have to be introduced to trace the exact type of mercury – containing equipment
- The Ministry of Environment is currently taking steps to develop HS codes for mercury added products with the support of relevant authorities.

Needs / Challenges

- Minimization of Hg waste generation from sources
 - Hg related Industrial Activities
 - Obsolete Hg Bulbs
 - Waste Electrical and Electronic equipments
 - Broken medical equipments
 - Dentistry
 - Coal power plants
 - Laboratories and research institutes
- Improve laboratory facilities (Ex: SL Customs labs, NMRA, CEA, SLSI, CAA)
- Preparation of national HS sub divisions for Hg containing products
- Gradually phasing-out using of Hg containing equipment (ex: Medical devices) and introducing alternatives
- Storage facilities (below 25°C)
- Activate Hg containing bulbs recycling plant – Now it is not working
- Exportation of Mercury containing waste through PIC procedures of Basel Convention.
- Awareness raising among young generation about Hg containing cosmetics.

Future Plans

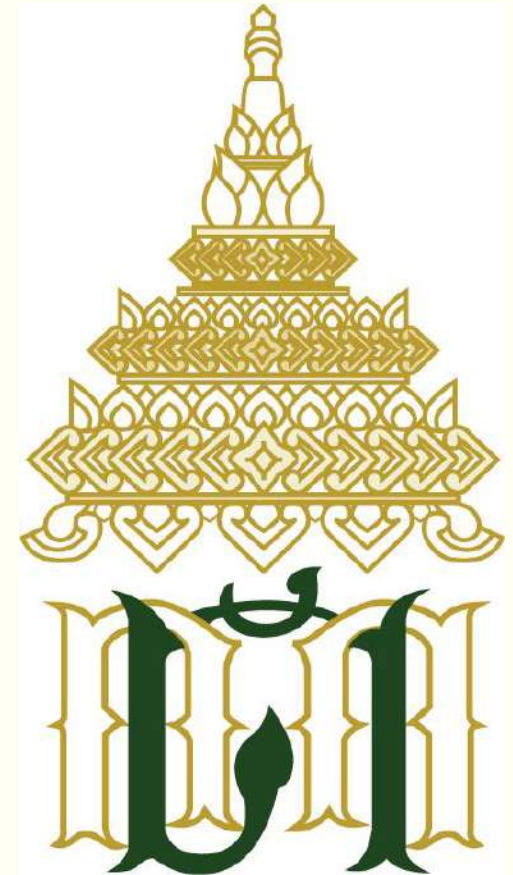
- An Integrated HW Disposal Facility with a Secured Landfill is to be established in order to proper disposal of Hazardous waste including Hg Waste
- Technical assistance and financial assistance with respect to the Hg waste management is expected from the Minamata Convention
- Encouragement and promotion of Hg free alternative products/Equipments and Industries



Thank You

Thailand Customs Department

Sub – Regional Customs Training to
Enhance Monitoring of Trade of
Mercury and Mercury Compounds



National Situation of Trade of mercury, mercury compounds and mercury added products

- Trade in Mercury and Mercury added product mainly found in daily use and industrial product such as Cosmetic dental and ETC which under varies of authority's organization
- EX The Food and Drug Administration , DIW and ETC

Thailand's Customs Department role

- Under Convention

- Supporting Unit under Convention (Basel Convention, Stockholm Convention, Rotterdam Convention , Minamata Convention and ETC.) Other Organizations are Focal point such as PCD and Authority Department such as DIW and DOA(Dangerous material or chemical).

- Under Domestic Law

- Supporting unit represent the Authority Organizations.

Legal Framework

- Convention

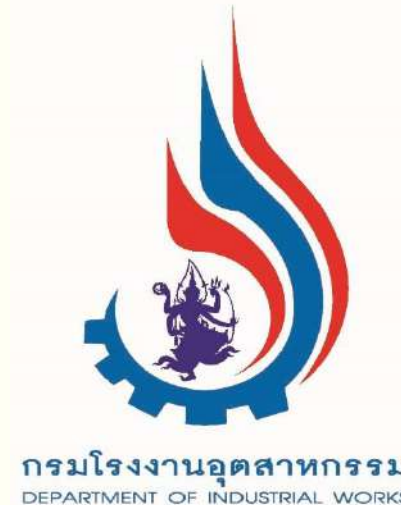
- Basel Convention
 - Plastic and Electronic waste
- Stockholm Convention
 - POPs
- Rotterdam Convention
 - Pesticide
- Minamata Convention
 - Mercury
- ETC.



Legal Framework

■ Domestic Law

- Hazardous Substance Act. B.E. 2535 (1992)
 - Restriction: Import, Export or Transit licensing
 - Hazardous waste under Basel Convention
 - Restricted Chemical or substance under conventions
- Export and Import of Goods Act. B.E. 2522 (1979)
 - Prohibition
 - Restriction: Import export or transit Licensing
 - Waste other than those stipulated in Hazardous substance Act.



Legal Framework

- Domestic law
 - Customs Act B.E. 2560 (2017)
 - Customs Offences
 - Smuggling
 - Import, export or transit licensing/ Ban/ Avoidance of Restriction / Prohibition
 - False Declaration
 - Customs Tariff Decree B.E. 2530 (1987)
 - HS Code (6-8 digits number)
 - Statistic Code (3 Digits / 3 Letters)
 - ex: Basel (899)



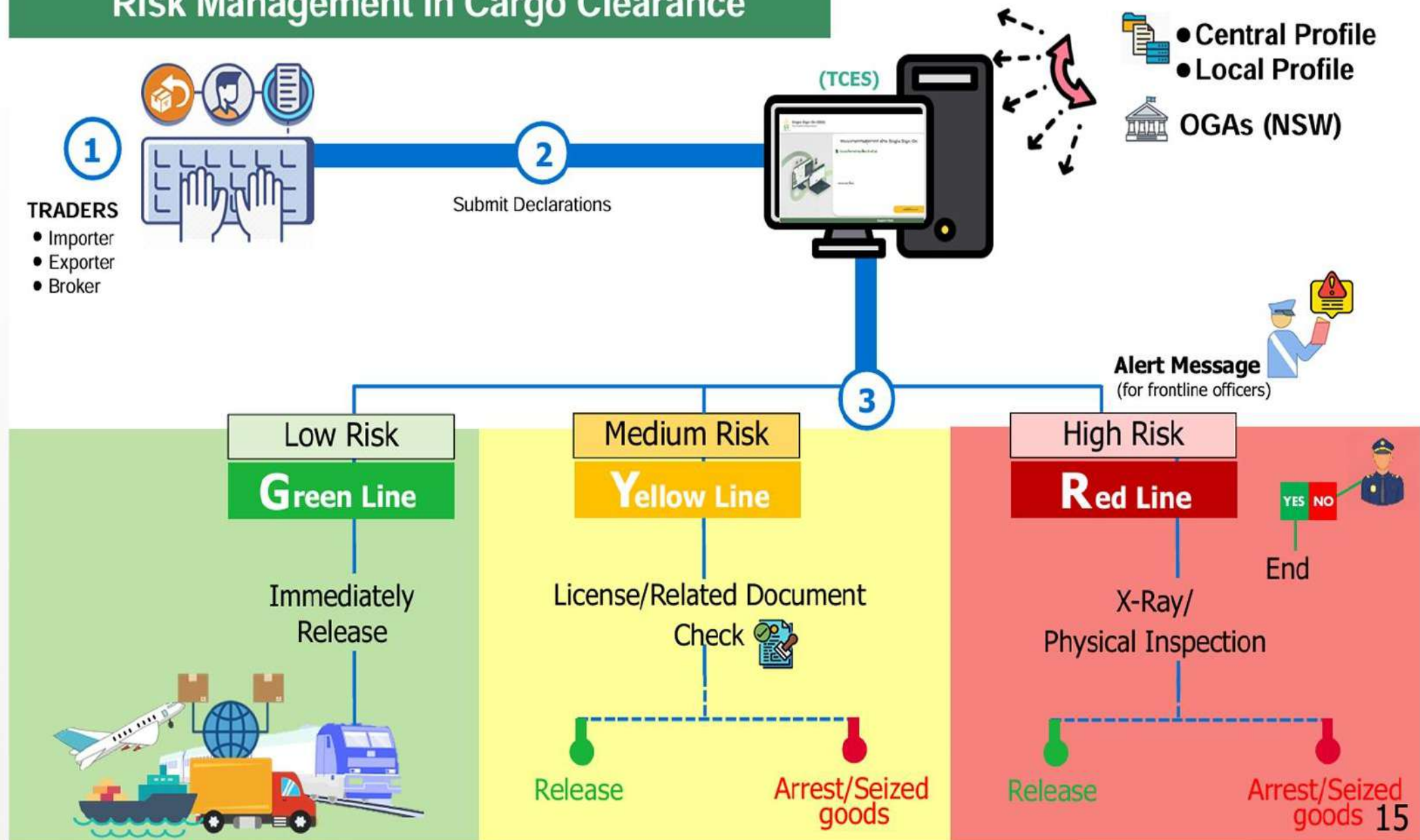
Enforcement

- Customs Formalities
 - Before the Boarder
 - Importer / Exporter / Transit / Operator
 - Request licensing
 - Fill goods declaration form
 - Under Customs Custody
 - Examine the information provided in the goods declaration form.

Enforcement

- Risk Management
 - Profile system
 - Local profile
 - Center profile
 - On Side Examine
 - Lock up declaration document for on side examine.
(in case of suspect in detail or resemblance goods in Declaration document)
 - High Risk Goods (A)

Risk Management in Cargo Clearance



การบริหารความเสี่ยง
Risk Management

เครื่องมือและเทคโนโลยี
Tools & Technologies

Central
Profile



Customs
Intelligence Center
(HQ)

Local
Profile



Local
Customs House/
Office

e-Customs



TCES
Thai
Customs
Electronic
Systems

X-Ray



NII
Fixed X-Ray
System
And
Railway
Fast Scan

Megaports



RDS
Radiation
Detection
System
Railway

E-Lock



e-Lock
Tracking
System

K-9



K-9
Drug
detection

Case work Procedure

- Work flow

- examine Via Customs system
- On side examine
- arrested
- Penalty and Reexport seized goods (Under Basel Convention and Domestic law) Cooperation with Shipping Line (Detecting at port of loading and address the reexport process)

More than 6-digit HS codes for mercury added products and Challenge

- Thailand use 8 digit Codes : last 2 digits for ASEAN HS code
 - No statistic code for Minamata Convention in present
 - Scope the mercury added product which under Minamata Convention.
 - Effective Guideline for identify the product under Minamata convention (Similar to Basel Convention)

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury and Mercury Compounds

Country presentation – Vietnam

Country profile



Legal Frameworks

1. National Legislation

- Chemical Law (2007)
- Decree No. 113/2017/ND-CP
- Decree No. 82/2022/ND-CP
- Circular No. 45/2020/TT-BCT

2. International Commitments

- Minamata Convention on Mercury (2013)

Legal Frameworks

3. Industrial and Product Regulations

- **Decree No. 82/2022/ND-CP:** more than 1 kg of mercury or mercury compounds must develop and submit chemical incident prevention and response plans
- **Circular No. 45/2020/TT-BCT:** applies to producers, importers, and traders of fluorescent lamps containing mercury.

Government Authorities

1. Ministry of Industry and Trade (MOIT)
2. Ministry of Natural Resources and Environment (MONRE)
3. Ministry of Health (MOH)
4. Ministry of Science and Technology (MOST)
5. Ministry of Finance / General Department of Customs
6. Ministry of Public Security (MPS)

HS code

- Mercury: 2805.40.0
- Mercury forms amalgams with several base metals (alkali metals and alkaline-earth metals, zinc, cadmium, antimony, aluminium, tin, copper, lead, bismuth, etc.): 2853.90.90
- Other products:
 - + Mercury Thermometer: 9025.11.0
 - + Fluorescent lamps: 85.39
 - + Disinfectants: 3808.59

Illegal Mercury Trade

- **Online Platforms:** Lazada, Shopee, and Facebook Marketplace.
- **Artisanal Gold Mining:** Mercury use persists in small-scale gold mining due to a lack of support for mercury-free technologies and alternatives

Challenges in Mercury Management

1. Inadequate Legal and Regulatory Framework
2. Weak Interagency Coordination
3. Illegal Trade and Poor Border Control
4. Low Awareness and Stakeholder Engagement
5. Limited Technical and Monitoring Capacity
6. Inadequate Waste Management Infrastructure
7. Challenges in Implementing the Minamata Convention
8. Limited Funding and International Support

THANK YOU!

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products

WORKSHOP OVERVIEW

Tuesday 3 JUNE 2025

Sri Lanka is a participating country in 2 key projects related to mercury trade management:

- **“Project for promoting the Minamata Convention on Mercury by making the most of Japan's knowledge and experiences to support Parties in the implementation of the Convention”** has a special focus on the area of information exchange, awareness and education, research, development, and monitoring. A comprehensive programme was designed to strengthen enabling capacity, build on the resources in and around Minamata, and employ technologies held by institutions in Japan for the effective implementation of the Convention's obligations.
- **“Eliminating Mercury Skin Lightening Products”** aims to eliminate mercury-added skin lightening products by supporting governments to develop or strengthen existing legislation and regulations to phase out skin lightening products in line with the Minamata Convention; engaging supply chain actors in an attempt to stop production, trade and distribution of skin lightening products; strengthening national capacities in testing and monitoring the skin lightening products and providing training of custom agents; and raising awareness about the issue in the project countries and at the regional and global levels.



Regional Training Initiative

This regional training initiative aims to equip customs officers, environmental regulators, and law enforcement agencies with the necessary tools to detect and control mercury trade. Key areas of focus include regulatory compliance, risk assessment, intelligence-sharing, and forensic analysis. By building enforcement capacity and fostering regional cooperation, the program seeks to establish a sustainable enforcement network that enhances regulatory compliance and safeguards public health and ecosystems.



Goals of Training

1. Strengthen technical knowledge on international regulatory frameworks and trade monitoring.
2. Enhance law enforcement skills in tracking, detecting, and managing high-risk mercury shipments.
3. Foster cross-border collaboration and intelligence sharing among enforcement agencies.
4. Provide practical training on regulatory compliance, forensic tracking, and digital monitoring tools.
5. Gather up to date information on mercury trade data and national challenges.



Regional Training Outcomes

- ✓ Strengthened regulatory enforcement and trade monitoring.
- ✓ Improved intelligence-sharing mechanisms for inter-agency cooperation.
- ✓ Creation of regional action plans for mercury trade control.
- ✓ Enhanced ability of law enforcement officers to track trade routes.

Schedule of Overall Activities

Regional Workshop

(3–4 June 2025, Colombo, Sri Lanka)

1–4 representatives from several project countries in Asian region from Customs, Law Enforcement and Ministry of Environment share lessons learned, priorities for action and coordination in the region to enhance monitoring of mercury trade.

Schedule of Overall Activities

Online Webinars:

3 webinars (1.5 hours each)

Between May – July/August 2025

1. Overview on the issues posed by mercury, mercury trade and the relevant obligations under the Minamata Convention – *held 26 May 2025*
1. Review of Regulatory Framework for Managing Mercury Trade – late June/early July 2025
1. Lessons Learnt from In-Country Training Workshops – late July/early August 2025

Schedule of Today's Key Activities:

Registration		
8:30-9:15	Registration Housekeeping announcements	Asian Institute of Technology (AIT)
9:15 – 9:30	Opening Ceremony	Government of Sri Lanka
9:30-10:00	Opening remarks	Malgorzata Stylo, United Nations Environment Programme (UNEP) Anna Kobylecka, World Customs Organisation (WCO) Guilberto Borongan, Asian Institute of Technology (AIT) Ms. Abeykoon, Sri Lanka Government Representative
10:00-10:10	Introduction Objectives, expected outcomes, and schedule of the training.	Ashley Bastiansz, Biodiversity Research Institute (BRI)
Session 1: Mercury Trade Issues, Regulatory Frameworks and		
10:10-10:30	Overview of Mercury Use, Trade and Environmental Impacts	Tahlia Ali Shah/ Ashley Bastiansz, BRI
10:30 – 10:45	Overview of Mercury Impacts on Human Health	Dr. Elena Jordan, World Health Organisation
10:45 – 11:05	Short Break and Group Photo	

Schedule of Today's Key Activities:

11:05 – 11:25	Overview of global mercury trade regulations under the Minamata Convention and Basel Convention	Malgorzata Stylo, UNEP
11:25 – 11:35	Regional Responses to Mercury Trade - The Bali Declaration	Ministry of Environment, Indonesia
11:35 – 12:30	Country Presentations providing a brief overview of mercury trade areas of concern (10-15 minutes each)	Country Participants
12:30-14:00	Lunch	
Session 2: Strengthening Enforcement & Compliance		
14:00 – 15:00	Continuation of Country Presentations and Open Summary Discussion	Country Participants, BRI
15:00 – 15:30	Indonesia's Experience in Drafting Guidelines for Handling Seized mercury and cinnabar	Dr. Ratih Andrawina Suminar, Attorney General's Office, Indonesia and Center for Regulation Policy and Governance (CRPG)
15:30 – 15:50	Promoting Interlinkages amongst Agencies such as Customs, Environmental Agencies, National Lab and Legislation - Lessons Learnt from the Eliminating Mercury Skin Lightening Products Project in Sri Lanka	Chalani Rubesinghe, National Project Coordinator
15:50 – 16:10	Short Break	
16:10 – 16:30	Key operational best practices for Customs administrations and the available resources for enhancing implementation of the Minamata Convention on Mercury/other environmental agreements	Anna Kobylecka, WCO
16:30 – 17:00	Day 1 Wrap Up Discussions	All Participants

Overview of Mercury Use, Trade and Environmental Impacts

Presenter: Tahlia Ali Shah, BRI

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury,
Mercury Compounds and Mercury-added Skin Lightening Products

Tuesday 3- Wednesday 4 June 2025, Colombo, Sri Lanka

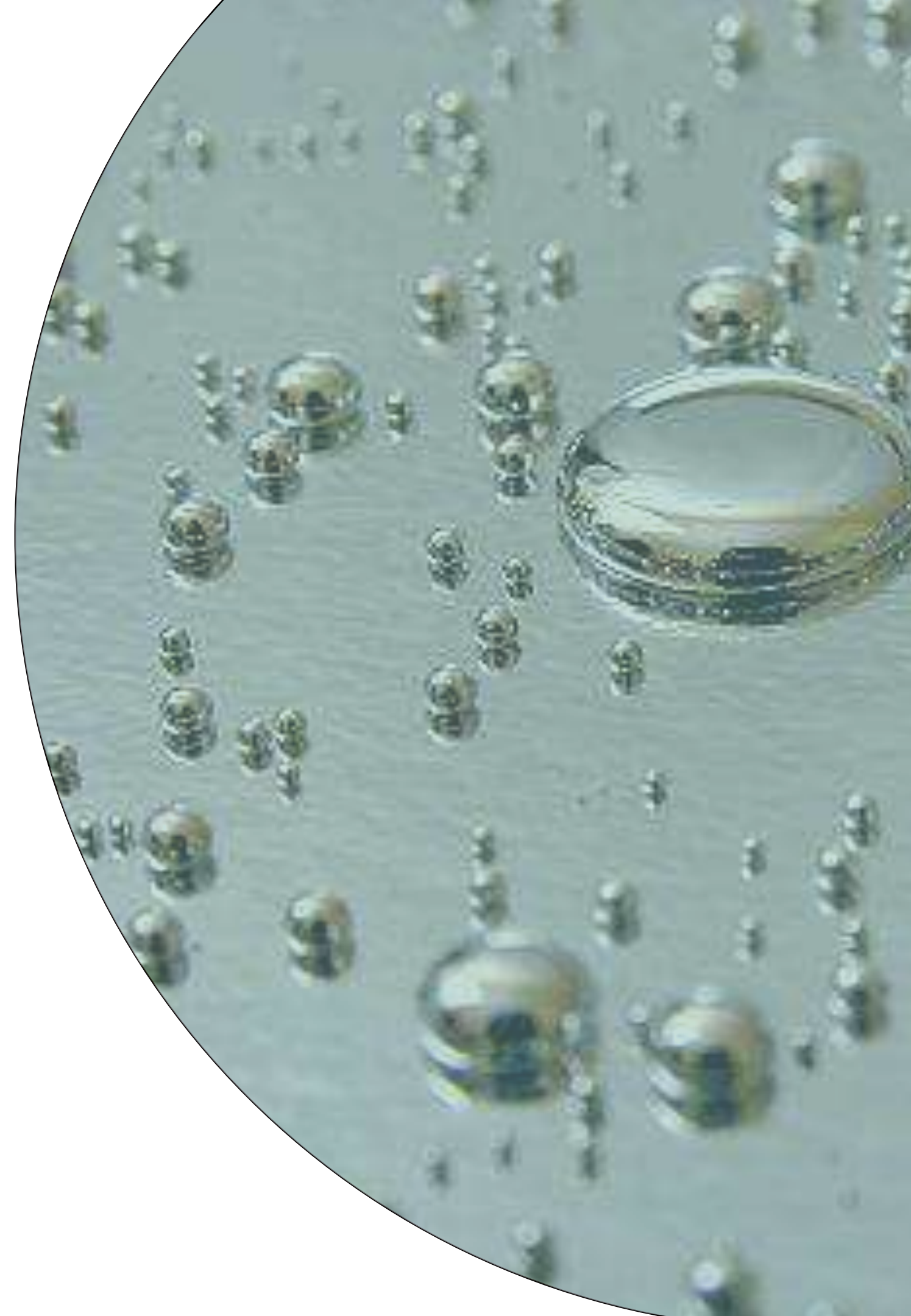
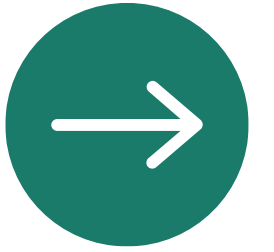


TABLE OF CONTENTS



- What activities drive mercury trade?
- Why is mercury an issue to the environment?

The Mercury Cycle



Naturally Occuring

Mercury can be found in the pores and crevices of the earth's crust, and can be released into the environment during natural seismic events such as earthquakes and volcanic eruptions.

Compounding Negative Effects

Over time, mercury in the atmosphere and the environment may get into waterbodies and enter the aquatic food chain, where it accumulates in larger species of fish that we may consume.



MERCURY, A TOXIC ELEMENT

Can cause damage to our nervous system, liver and kidneys in addition to a number of varying symptoms.

Harmful Human Activity

Mercury has been used in some industrial processes and in the production of some products, but this continued use can increase levels of exposure in the atmosphere as well as in our water sources.



Mercury (Hg) may be found in different forms, all with different sources and applications:

- **Elemental Mercury** (silver liquid)
- **Inorganic mercury salts** (e.g., mercuric chloride, mercuric sulfide (cinnabar))
- **Organic Mercury** (e.g., methylmercury, dimethylmercury)

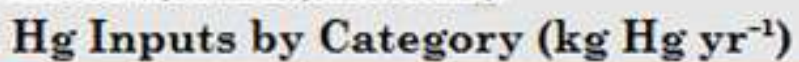
Summary of results from UNEP's *Toolkit for identification and quantification of mercury releases*

- ✓ Select a region using the regional drop down menu to update the Hg Inputs in each figure and statistic.

Global



© 2025 Mapbox © OpenStreetMap



Gold extraction / processing other than amalgamation

Copper
extraction and
initial
processing

Zinc

Batteries with mercury

Cosmetics and related products with mercury

Informal dumping of general waste

Electrical switches and relays with mercury

Biocides
and
pesticides

Waste water

Informal waste burning

Coal

Hg input by country (kg Hg yr⁻¹)

per capita Hg input by country (kg Hg yr⁻¹ 100,000 people⁻¹)



5.1-Fuels/energy sources

5.2-Primary metal production

5.3-Other minerals and materials

5.4-Industrial processes

5.5-Consumer products

5.6-Other product/process use

5.7-Production of recycled metals

5.8-Waste incineration/burning

5.9-Waste deposition/landfill/wastewater

5.10-Crematoria and cemeteries

Estimated **Global** Sources
of Mercury Releases
Based on UNEP's Toolkit for
identification and
quantification of mercury
releases for **78 countries**
assessed as of 2022*.

Major Sources:

- Primary Metal Production
(Artisanal and Small-Scale Gold Mining accounts for almost 38% of the global total).
- Production, Use and Disposal of Mercury-added consumer products
- Coal combustion

What are the main sources of mercury compounds?

Mercury compounds may be **stored/produced from direct use/production** at:

- Primary mercury (cinnabar) mining facilities;
- Mercury compound producers;
- Facilities that manufacture products or catalysts containing mercury compounds;
- Mercury compound traders, especially those involved in transboundary movements of commodity grade mercury compounds;
- Other interim storage facilities.

What are the main sources of mercury compounds? (cont'd)

Mercury compounds may be stored/produced as **byproducts or wastes** at:

- Mercury recycling and waste treatment facilities;
- Non-ferrous metal mining or processing facilities;
- Natural gas and oil production and processing facilities;
- Facilities producing vinyl chloride monomer (VCM) using mercury chloride catalysts;
- Facilities producing polyurethane products with mercury compound catalysts;
- Mercury cell chlor-alkali facilities;
- Sodium or potassium methylate or ethylate facilities using mercury cells;
- Unsecured waste disposal sites

Reports from IMPORTING COUNTRIES of >5000 kg of mercury compounds (in 2023)

	HS 285210 - Mercury compounds, chemically defined, inorganic or organic, excluding amalgams (net weight in kg)						Sum
Reporter	2018	2019	2020	2021	2022	2023	2018-2023
Italy	599820	504489	208425	238658	1747045	893173	4191610
France	1727960	1299633	1096285	1374556	1009754	488978	6997166
Czechia	269903	311001	455533	301523	281565	178681	1798206
Belgium	11965	10494	4111	435955	784576	125364	1372465
Spain	9659	8124	8488	9141	7818	67406	110636
Luxembourg	5388	5074	3059	5132	1892	48084	68629
Portugal	23261	28080	30836	30032	32255	24565	169029
Netherlands	8475	3326	1340	2437	1022	11034	27634
Canada	18598	69352	10969	17961	7391	12540	136811
Malaysia	130	244	332	1074	309	9656	11745
Germany	66100	37800	24100	21700	6890	7156	163746
Source: Trade Data Monitor (2018-2021) and Comtrade (2022-2023)							

Common Mercury Compounds:

Note: Based on assessments conducted by UNEP (2025), it was found that some mercury compounds can be produced at low enough costs to bypass trade restrictions in many countries for the purpose of extracting the elemental mercury.

- **Mercury(I) chloride**
- **Mercury(II) sulfide** (lower purity, black))
- Mercury(II) oxide
- **Mercury(II) sulfate**
- Mercury(II) nitrate
- Mercury(II) amidochloride (ammoniated mercury)
- Mercury(II) acetate
- Mercury(II) chloride
- Mercury(II) iodide
- Phenylmercury(II) acetate
- Mercury(II) bromide



Common Uses for Mercury Compounds

Common Purposes	Mercury Compounds
Manufacture of Certain Mercury-Added Products such as Batteries etc.	Mercury (I) Chloride, Mercury (II) Oxide, Mercury (II) Sulfate, Mercury (II) Chloride...
As a preservative, disinfectant or in the production of antiseptics (e.g. mercurochrome)	Thimerosal, mercury (II) amidochloride, phenylmercury (II) acetate, mercury (II) chloride...
Manufacture of Pharmaceuticals	Mercury (II) chloride, mercury (II) iodide, mercury (II) thiocyanate...
As a lab reagent	Mercury (II) nitrate, mercury (II) sulfate, mercury (II) chloride...
Synthesis of other mercury compounds or recovery of elemental mercury	Mercury (I) chloride, mercury (II) nitrate, mercury (II) acetate...
As catalysts in industrial process	Mercury (I) chloride, phenylmercury (II) acetate...
In gold and silver extraction	Mercury (II) sulfate
Manufacture of skin lightening products	Mercury (I) chloride, mercury (II) oxide, mercury (II) sulfate, mercury (II) chloride
Miscellaneous (in fireworks, thermoelectric applications, nuclear particle equipment, photo fixative...)	Many other mercury compounds

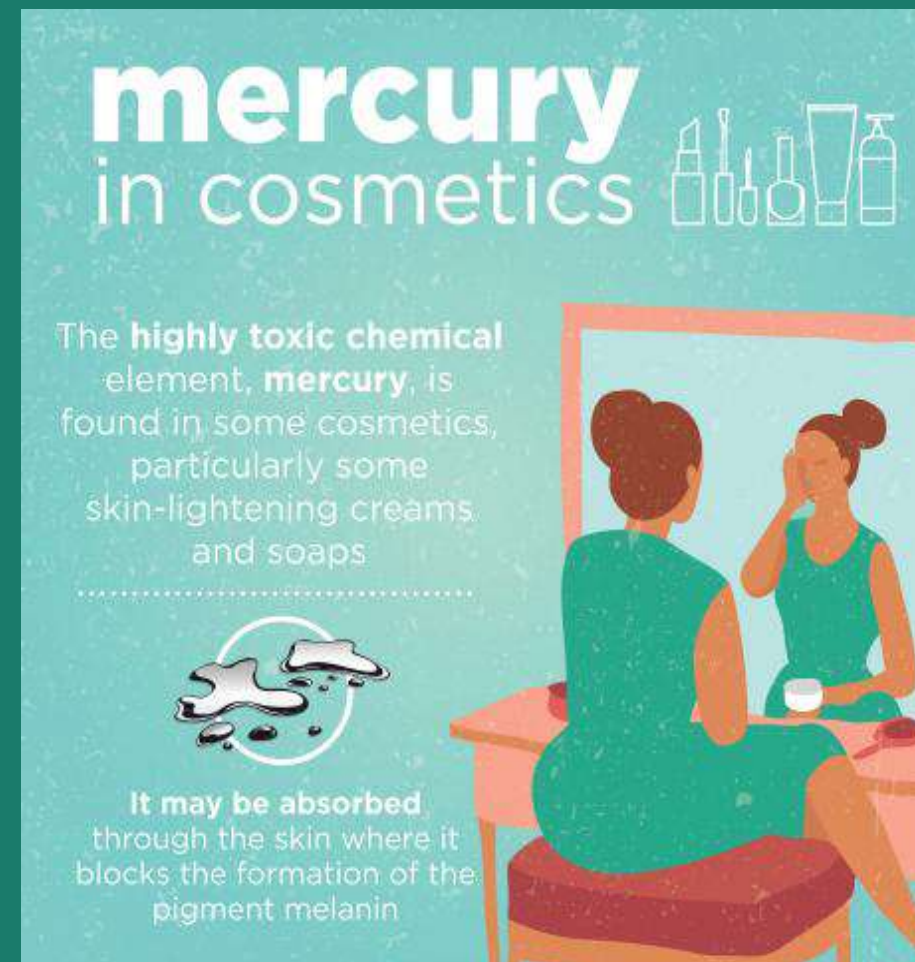
MERCURY ADDED CONSUMER PRODUCTS

Approximately 30% of the global demand for mercury is due to its use in products.

Due to its properties as a good electricity conductor, its high density and high surface tension, mercury has historically been used in many products such as **certain**:

- Lighting devices (e.g.) CFLs, LFLs and High-pressure mercury vapour lamps
- Batteries
- Electrical Switches and Relays
- Non-electrical measuring devices
- Dental amalgam fillings
- Pesticides, biocides and topical antiseptics
- **Cosmetics such as mercury skin lightening products.**

Many of these products are being phased out with manufacturing countries phasing out mercury use under the Minamata Convention and other countries agreeing not to import/export them, the long-lasting impacts of mercury releases due to disposal still poses a risk to be addressed.



Example: Trade of Mercury-added Skin Lightening Products (Hg SLPs)

Mercury Compounds Used for Manufacture of Mercury-added Skin Lightening Products:

- Mercury(I) chloride
- Mercury(II) oxide
- Mercury(II) amidochloride (ammoniated mercury)
– *most popular Hg compound reported in Hg SLPs.*



NOTE: There are very few Hg SLPs on the market that actually list mercury/mercury compounds as ingredients (despite having them in very high concentrations).

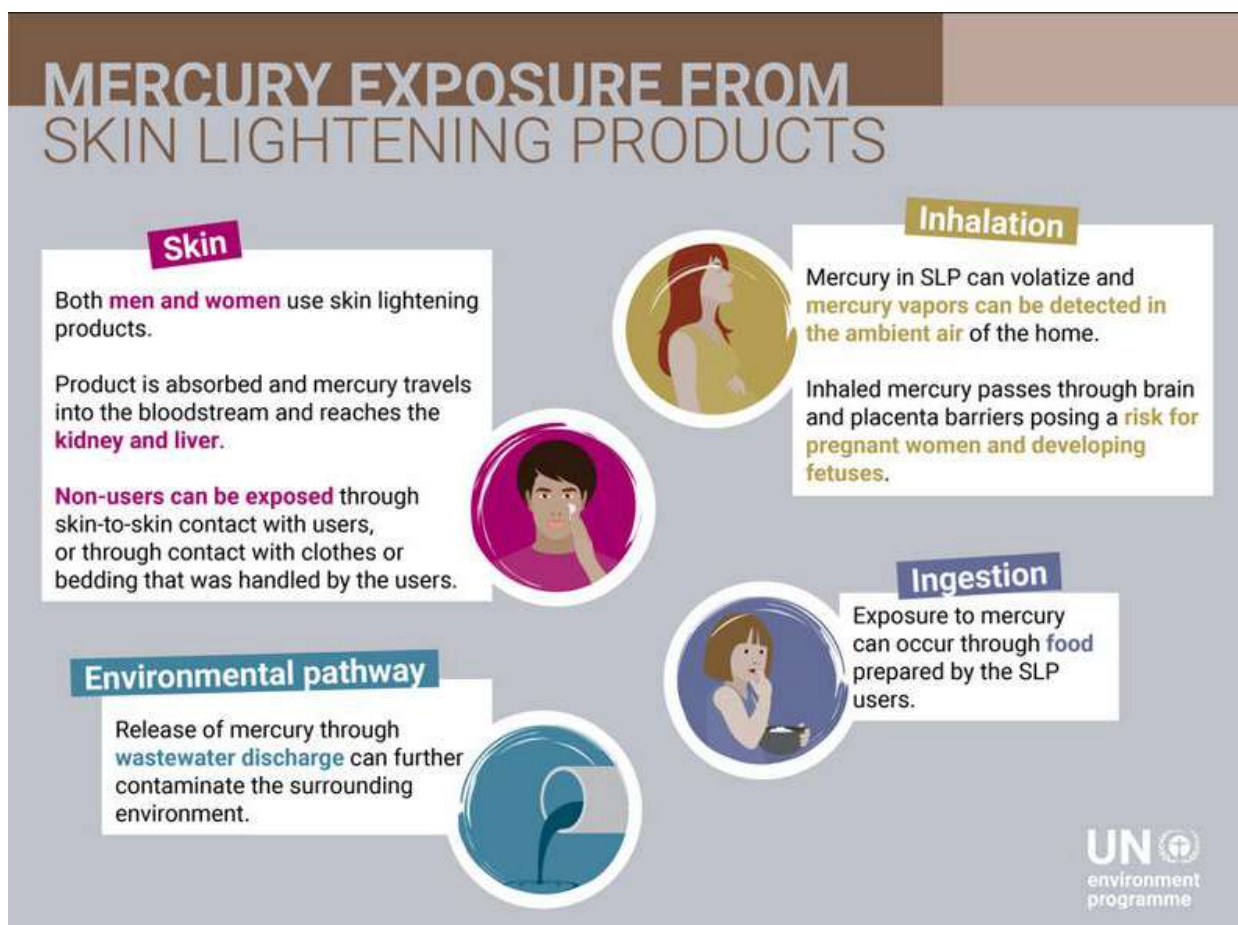
Where are the mercury compounds for the manufacture of Hg SLPs sourced?



Where are mercury compounds for the manufacture of Hg SLPs sourced?

A 2023 investigation conducted by the Environmental Investigation Agency (EIA) indicated that for Hg SLPs **manufactured in Thailand, Pakistan and Jamaica**, mercury compounds were imported by manufacturers **from India, Spain and the USA**.

Determining how these compounds were imported is unclear.



MERCURY EXPOSURE FROM MERCURY-ADDED PRODUCTS



ARTISANAL AND SMALL-SCALE GOLD MINING (ASGM) WITH MERCURY

ASGM occurs in over 80 countries at varying scales but is most prevalent in tropical and sub-tropical regions which tend to be the most biodiverse and sensitive ecosystems globally.

In ASGM, mercury may be displaced from the ground through mining practices however the most common source of mercury is due to its direct use in the extraction of gold.

Liquid mercury is often added to gold ore to form a mercury-gold amalgam which is then burned to evaporate mercury leaving behind the gold.

While many countries have implemented national action plans and other initiatives to reduce the use of mercury in ASGM, it is noted that with the increased market for gold, there is pressure to produce gold at any means necessary to meet demands.



Reference:

<https://www.channelnewsasia.com/asia/indonesia-gold-prices-soar-economic-uncertainty-5096191>

Photo Sources: [Kroll, 2024](#), [Evers, et. al, 2024a](#)

80

Number of countries where ASGM occurs, found mostly in tropical regions.

15 Million

People rely on ASGM for their livelihood, mostly in rural areas.

4-5 Million

Women are included in the total number who rely on ASGM.

38

Percent of global anthropogenic mercury emissions from ASGM.

ASGM Process



Heavy excavation to prepare mining sites



Mercury/gold amalgam heated to evaporate Hg



Hg contaminates run off (mine tailings)

How Mercury from ASGM Enters the Environment



Study Highlights

84

Percent of land area deforested over the last 20 years directly resulting from ASGM activities (concentrated in only 10 countries).

54

Percent of documents reviewed that cite chemical pollution of terrestrial and aquatic ecosystems as one of the main consequences of ASGM.

59

Percent of NAPs reporting the presence of cyanide leaching in mercury tailings → highly mobile, toxic, and bioavailable mercury-cyanide complexes.

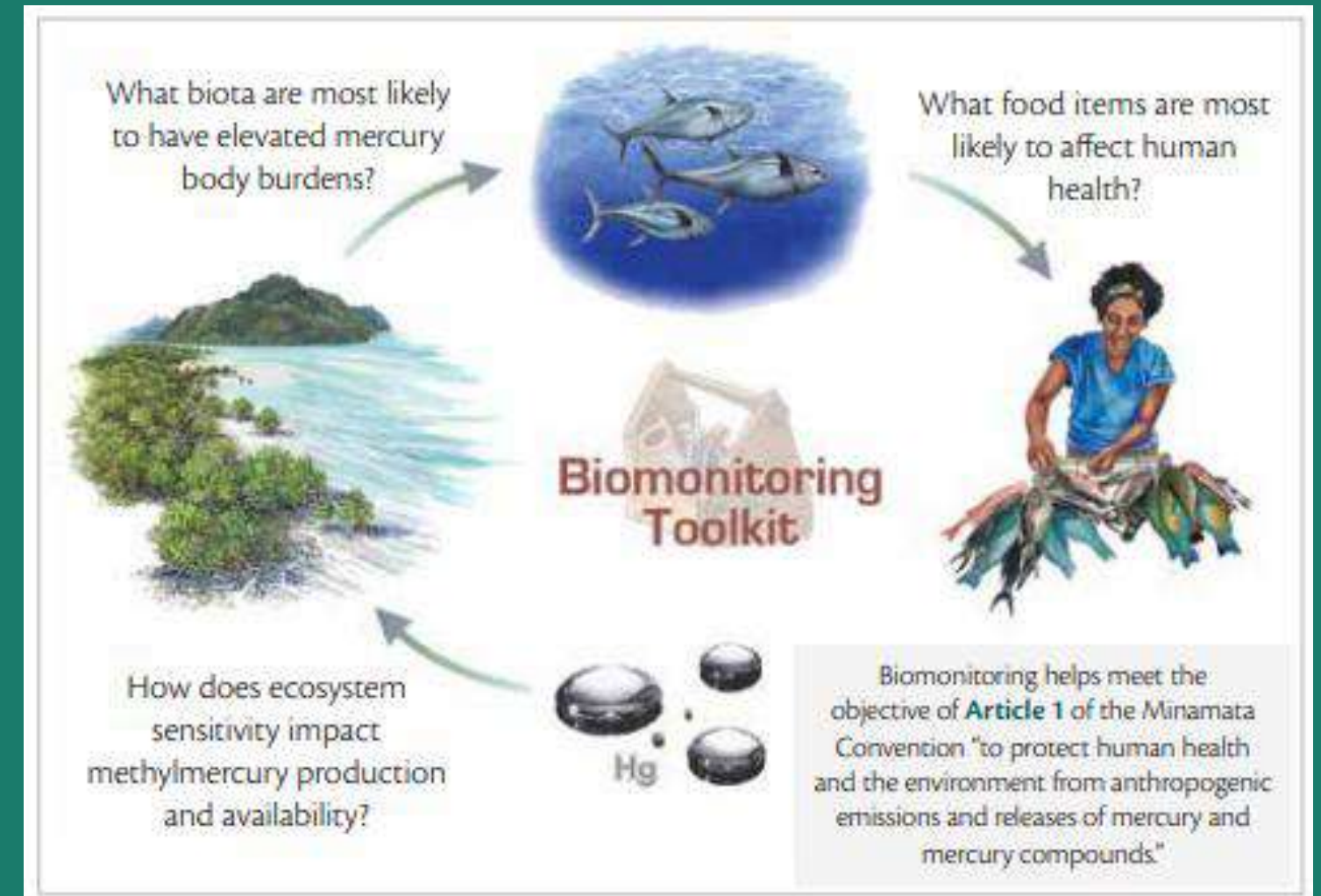
How does mercury impact ecological health?

Depending on environmental conditions, when mercury is released into the land, air and water, it may be converted to methylmercury.

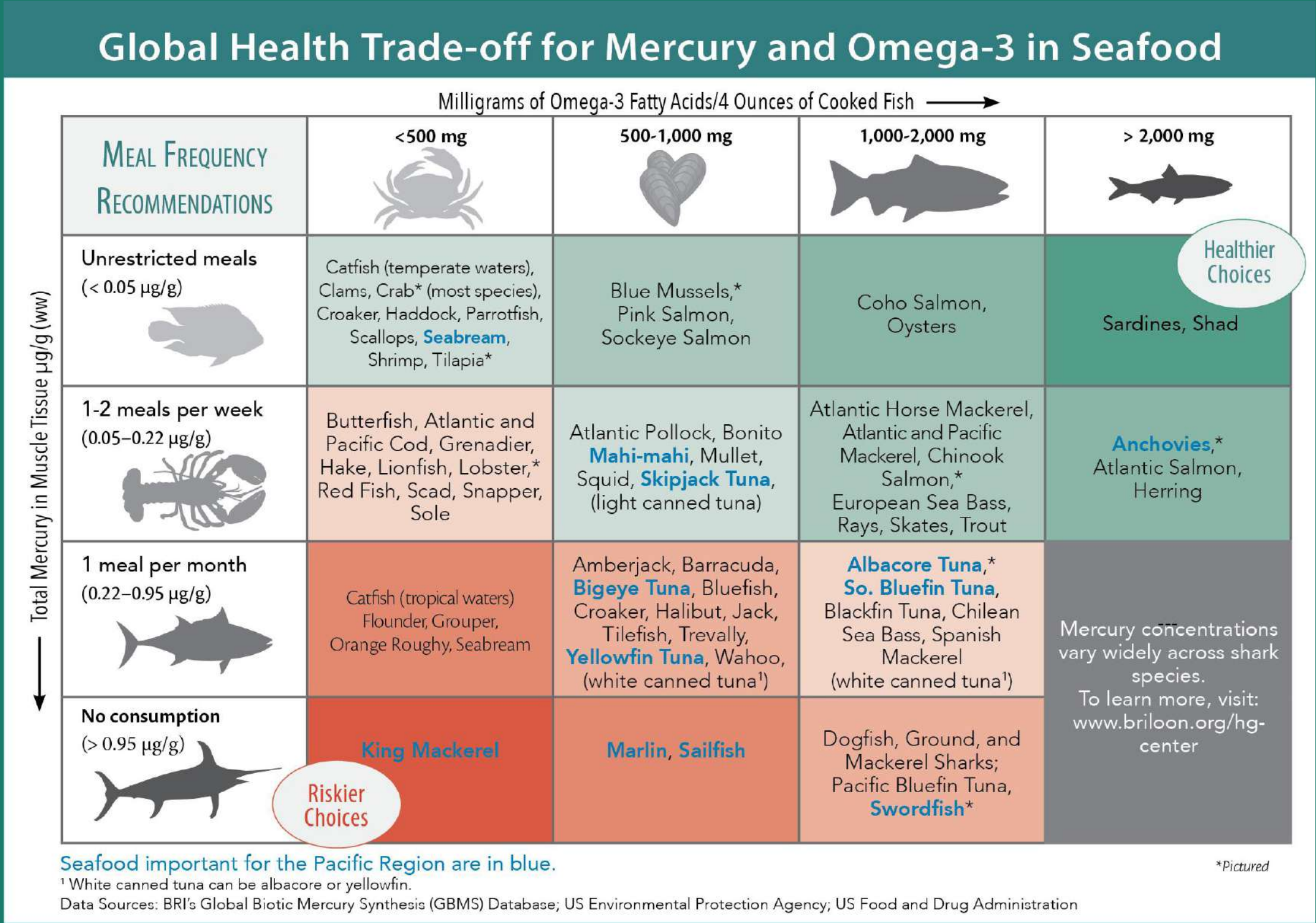
Biological Mercury Hotspots are areas that are particularly sensitive to mercury deposition where:

- methylation rates are highest
- biomagnification in the food web is greatest
- Animals experience significant reproductive harm.

Habitats of greatest risk tend to be aquatic environments, particularly, wetlands, mangroves and aquatic habitats near contaminated sites.



Fish from the sea or freshwater can be a major source of methylmercury accumulation in humans through consumption.



THANK YOU



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For more information on mercury supply, sources and trade, download the draft Minamata Secretariat Report at:
https://minamataconvention.org/sites/default/files/documents/other/Global%20Mercury%20Compounds_Draft_FOR_COMMENTS.docx



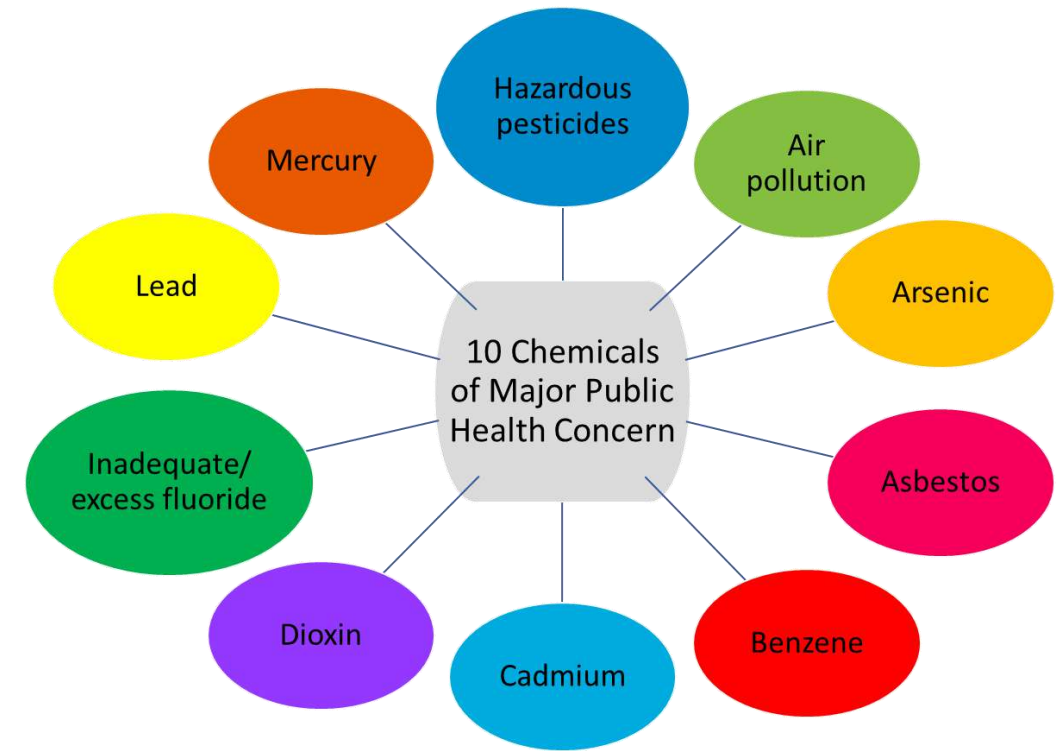
BIODIVERSITY RESEARCH INSTITUTE
innovative wildlife science

HEALTH EFFECTS OF MERCURY

National Customs Training to Enhance Cross-Agency Coordination to Control Mercury Trade
Colombo, Sri Lanka (2 June 2025)

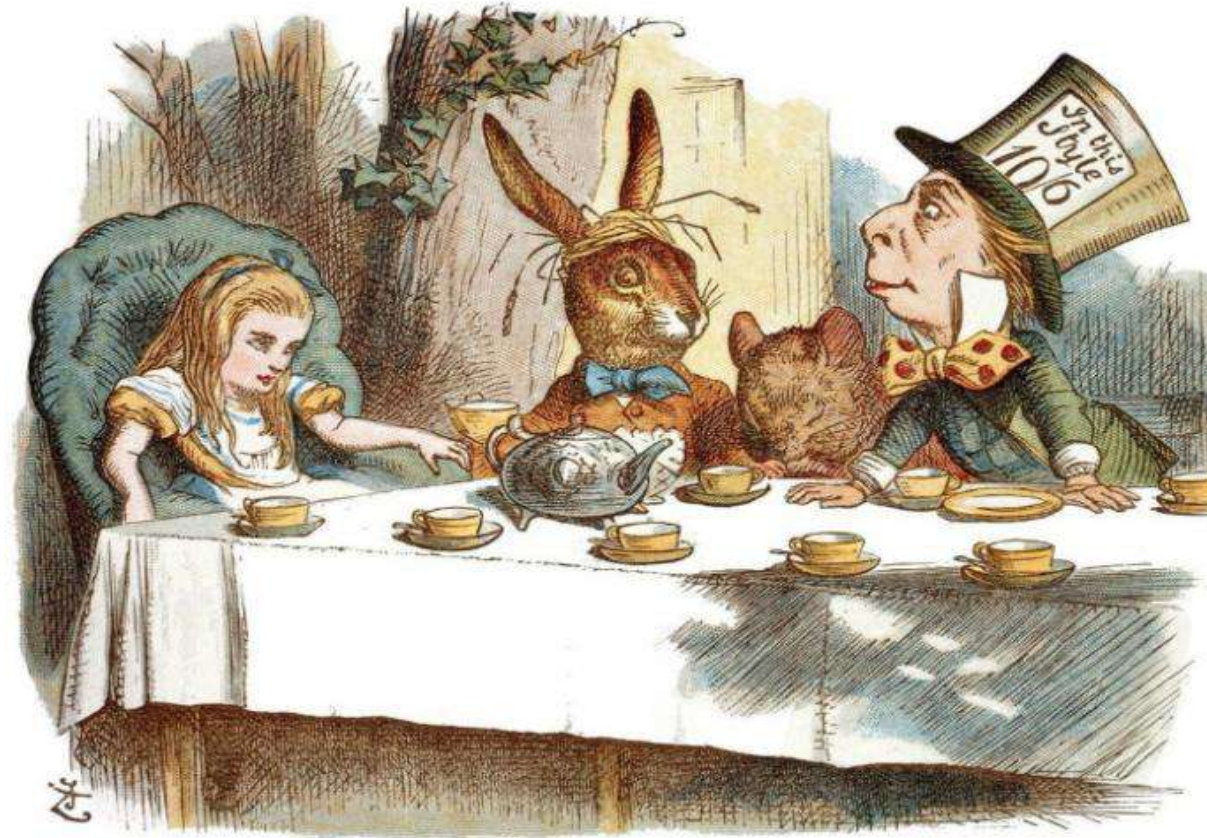
KEY FACTS

- Mercury is a naturally occurring element that is found in air, water and soil.
- Exposure to mercury – even small amounts – may cause serious health problems, and is a threat to the development of the child in utero and early in life.
- Mercury may have toxic effects on the nervous, digestive and immune systems, and on lungs, kidneys, skin and eyes.
- Mercury is considered by WHO as one of the top ten chemicals of major public health concern.
- Ministries of public health and WHO have critical role in preventing health impacts of mercury
- The general population is mainly exposed to methylmercury, an organic compound, when they eat fish and shellfish that contain the compound.
- Methylmercury has a different toxicity profile to ethylmercury. Ethylmercury is contained in thiomersal as a preservative in some vaccines and does not pose a health risk.



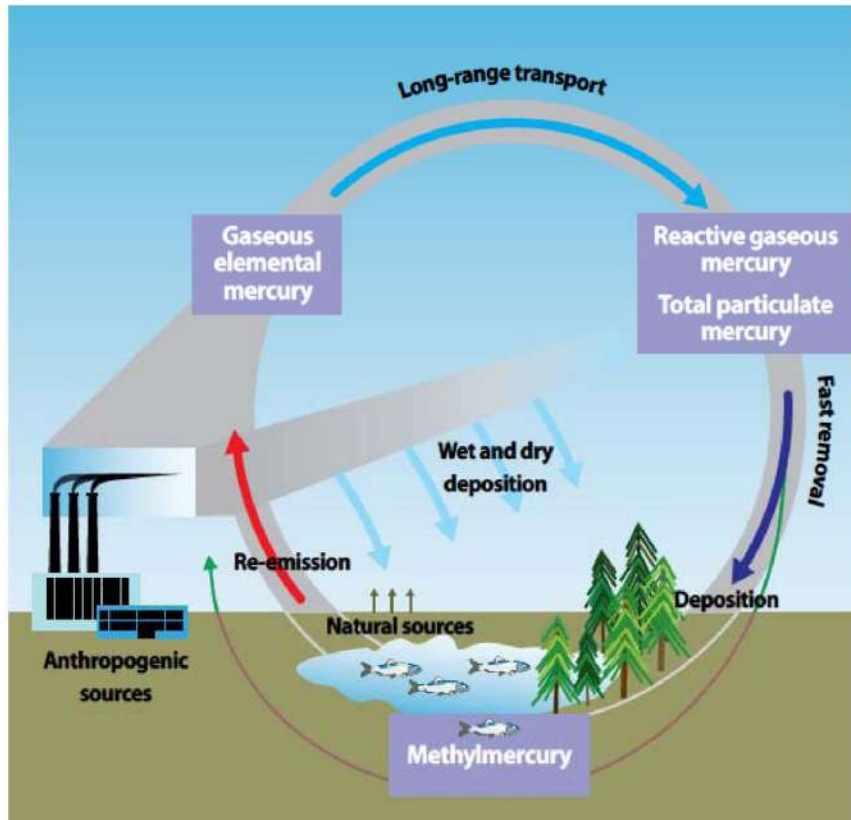
Common symptoms of mercury exposure in the 18th century

Central Nervous System – tremors, drooling and erratic behaviour

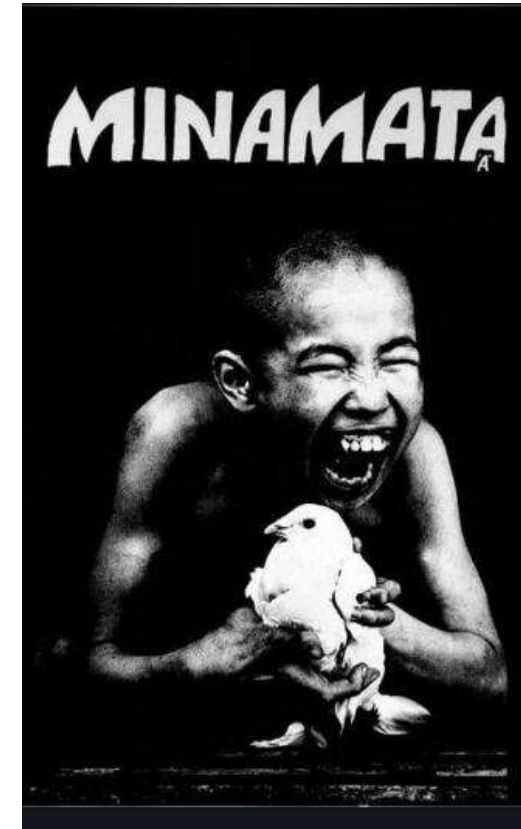


“Mad as a Hatter”

RELEASES TO THE ENVIRONMENT CAN ALSO CAUSE HUMAN EXPOSURE



Children of subsistence fishermen
1.5-17/1000 with cognitive effects from
methyl mercury



Chronic exposure Methylmercury
(1932 -1968). More than 2000 victims
officially recognized

HUMAN EXPOSURE IS POSSIBLE FROM DIVERSE USES



- **Industrial exposures** – Primary mercury mining, Vinyl chloride monomer production, e-waste scavenging, laboratories, manufacture of mercuric salts



- **Mercury-containing products** – batteries, paints, cosmetic skin lightening products, fluorescent lamps, dental amalgam, mercury thermometers & sphygmomanometers



- **Artisanal & small scale gold mining** – amalgamation of gold from breaking up gold-bearing rocks & tailings

HUMAN HEALTH IMPACTS

Impacts on health vary by:

- **Type of mercury:** Elemental mercury vapor, Inorganic salts, Organic mercury compounds
- **Route of exposure;** ingestion. Skin exposure, inhalation (e.g. eating contaminated fish which can present lifetime exposures)
- **Age/developmental stage;** in-utero fetal development
- **Duration of exposure:** e.g. environmental: in air, soil, etc.
- **Conditions:** Labour intensive ASGM,

TYPE OF EXPOSURE

Acute: exposure over a short period of time (e.g., 24 hours)

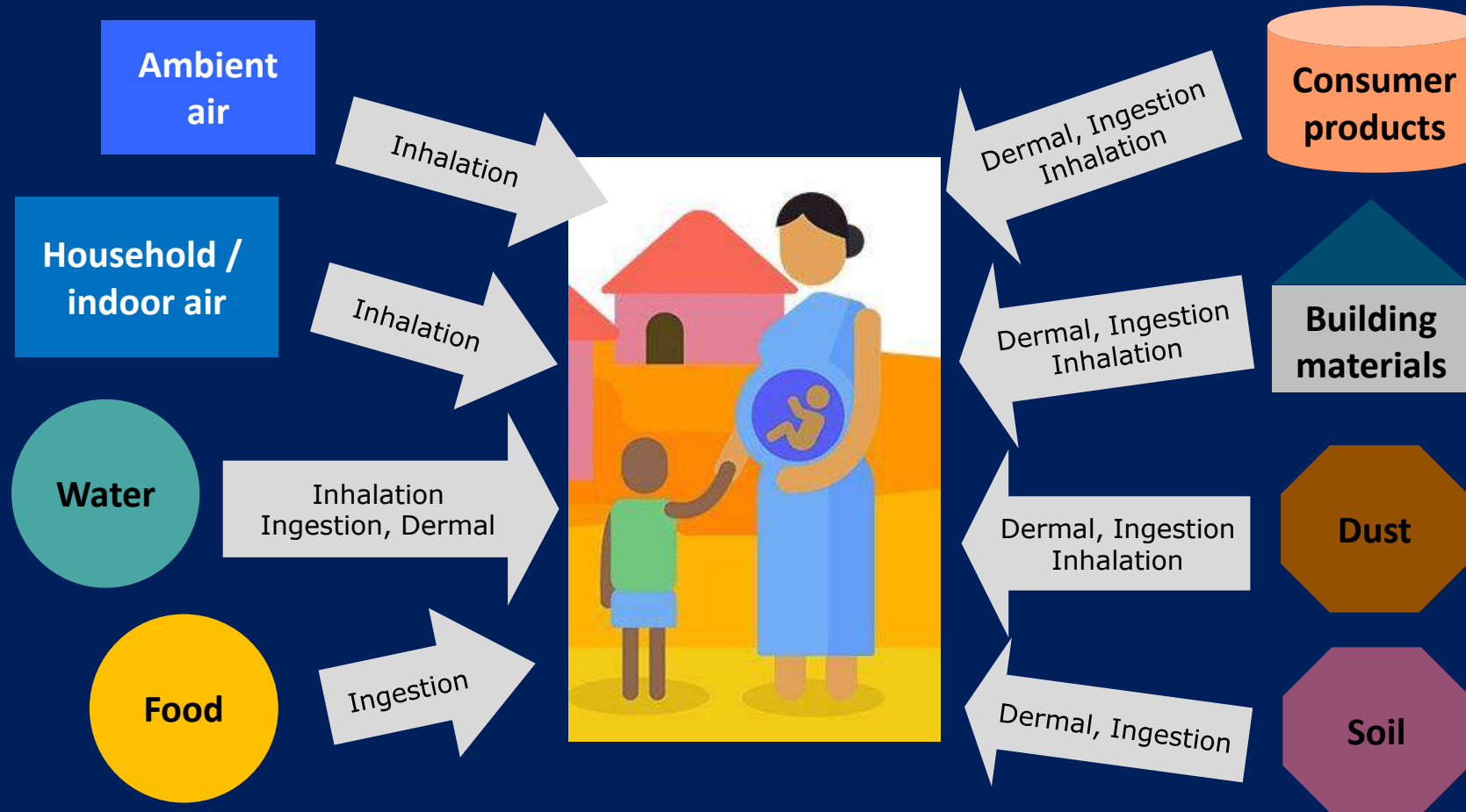
- Single: a single or unique and continuous exposure
- "Hit and run": acute exposure leading to delayed effects once the toxicant is gone

Chronic or long-term: continuous or repeated exposure, e.g., more than 24 hours, for weeks or months

"Acute on chronic": an acute exposure against a background of chronic exposure to the same agent



Routes of exposure



Transplacental exposure can affect fetal health



World Health
Organization

Different forms of mercury, exposure characteristics & health impacts

Mercury form	Source of exposure	Pathway of exposure	Biological matrix for HBM	Health end-points
Elemental Hg^0	Dental amalgam, air, accidental spills, worksites, food from contaminated sites	Inhalation (HL)	Blood Urine	Acute: lungs, gastrointestinal tract
		Ingestion (UL)		Chronic: central nervous system (anxiety, delirium, tremor, memory loss), kidneys - REVERSABLE
		Dermal (UL)		
Inorganic Hg^{2+}	Cosmetics, soaps	Ingestion (UL)	Blood Urine	Acute: gastrointestinal tract, kidneys
		Dermal (L)		Chronic: kidneys, central nervous system (the same like to elemental mercury), skin, immune system - REVERSABLE
Organic <u>MeHg</u>	Food, mother during pregnancy	Ingestion (HL)	Blood Hair	Central nervous system – developmental disorders caused by organic change in brain relevant to low-dose impact), cardiovascular system - IRREVERSABLE
		Parenteral (HL)		
		Transplacental (HL)		

Hyperpigmentation of the skin is a condition of a number of diseases & conditions



Skin damage – sun exposure
Side effects of drugs eg contraceptives
Pregnancy
Injury, scarring, acne etc



Melasma
Autoimmune disease – Addisons disease
& Vertiligo

Skin lightening is another story

Often referred to as “skin bleaching” or “skin toning”



Prevention is the single most effective means of protecting health

Health care providers play a key role in:

- Identifying the problem
- Defining its determinants and characteristics
- Informing the community – and the children
- Educating colleagues and other professionals
- Raising the awareness of policy-makers
- Promoting the implementation of appropriate measures
- Evaluating the efficacy of preventive measures



GLOBAL PERSPECTIVE ON MERCURY RISK REDUCTION IN HEALTHCARE SETTINGS

Exposure to mercury – one of the top 10 chemicals of major public health concern

Encourages Member States

- Promptly sign, ratify & implement Minamata Convention
- Address health aspects of exposure to mercury
- Recognize inter-relationship between health & environment & ensure close cooperation
- Promote appropriate health-care services for prevention, treatment & care
- Facilitate exchange of epidemiological information



WHA Resolution 67.11 (2014)

Requests WHO to facilitate & support Member States & work in cooperation with Minamata Convention bodies, UNEP, and others

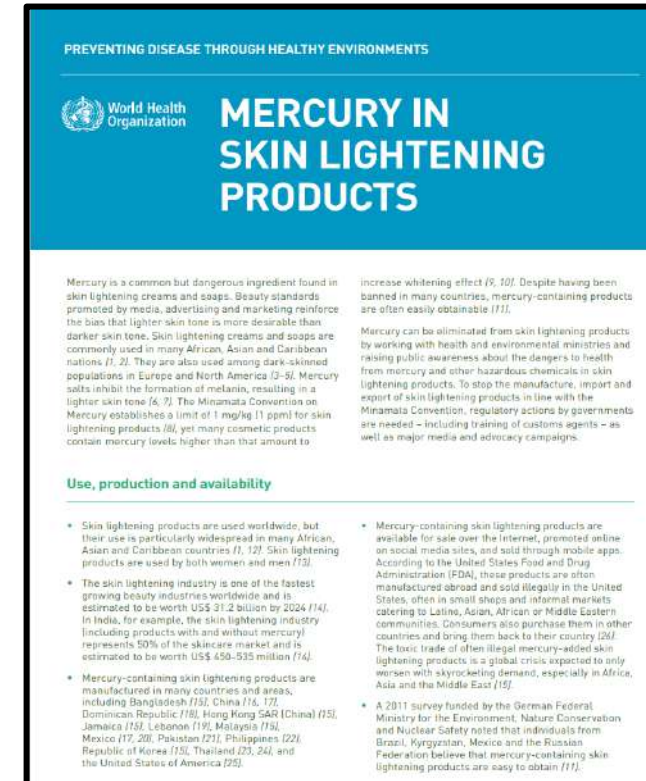
WHO technical resources on skin lightening products

Video

(<https://www.who.int/multi-media/details/mercury-in-skin-lightening-products0.int>)



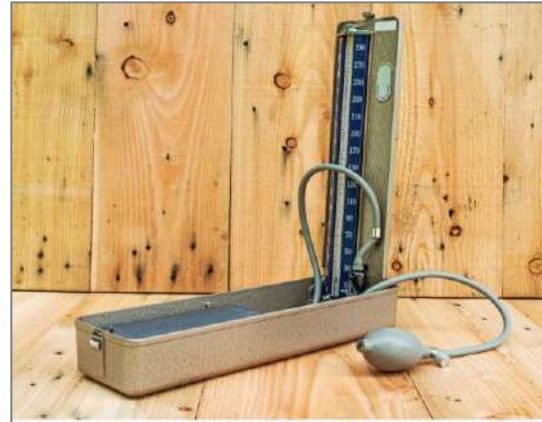
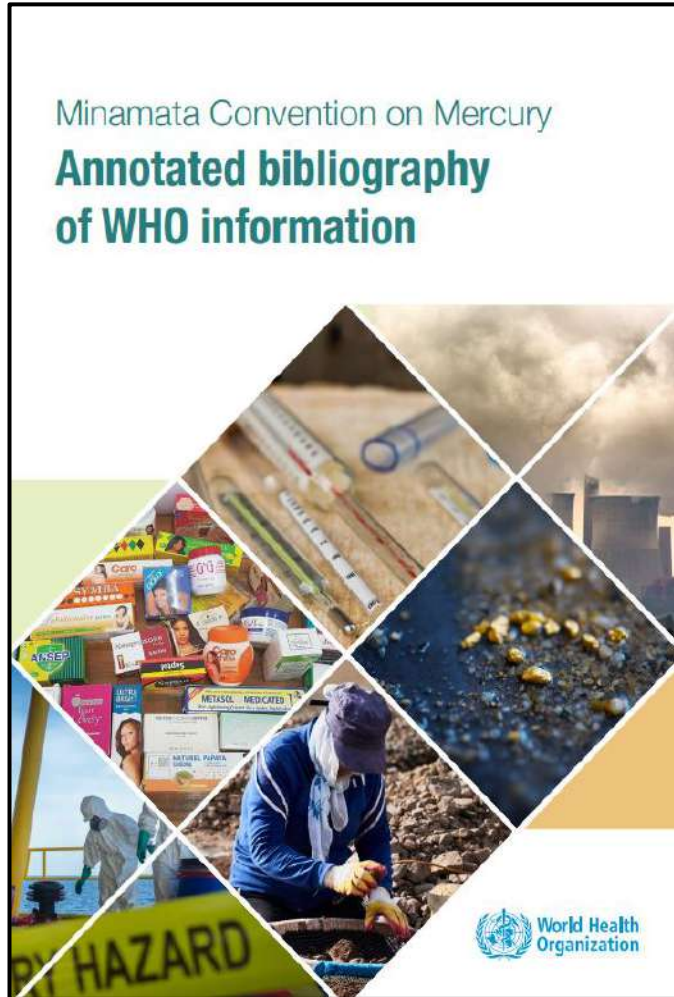
Introductory Fact Sheet



Not all skin-lightening products contain mercury

[Elimination of mercury-containing skin lightening products](#)

ANNOTATED BIBLIOGRAPHY OF WHO INFORMATION



Sphygmomanometers



Thermometers



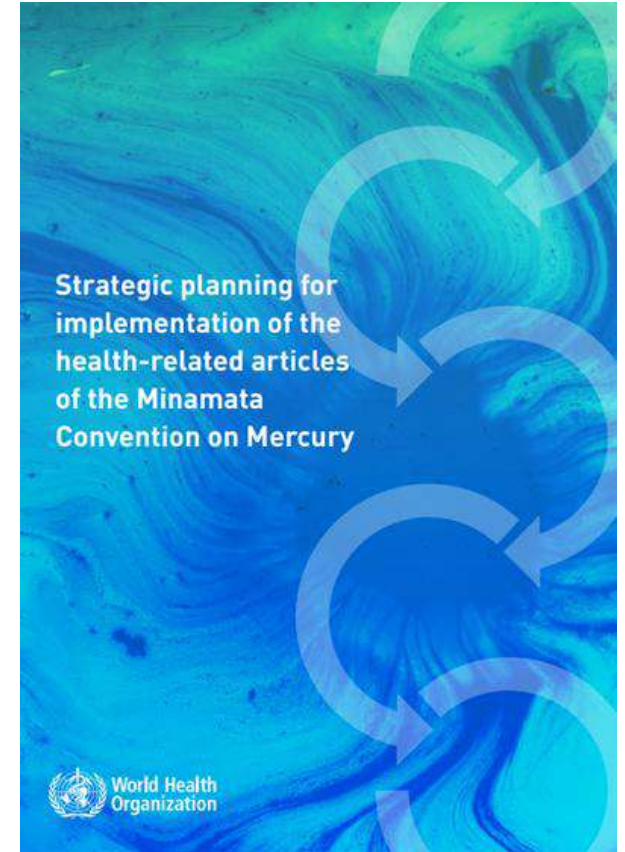
Skin-lightening products

Provides key information resources relevant to the Minamata Convention on Mercury and the associated World Health Assembly Resolution WHA67.11 Public health impacts of exposure to mercury and mercury compounds: the role of WHO and ministries of public health in the implementation of the Minamata Convention.

Other languages: [Arabic](#) | [Chinese](#) | [French](#) | [Portuguese](#) | [Russian](#) | [Spanish](#)

CONCLUSIONS

- Engagement with health sector critically important when taking measures to address thermometers and sphygmomanometers
- Much work already underway with national policies & procurement decisions including at health care level
- WHO has a mandate to work with the Secretariat of the Minamata Convention to address the health-related articles
- Targeted efforts supported by the GEF will give this work additional boost – additional technical guidance & model approaches incl. regulation expected outputs
- Mercury waste management is not only a public health necessity but a critical enabler of sustainable development.
- By integrating mercury control into national policies and waste systems, countries can make progress across a broad spectrum of the SDGs—ensuring healthier people, cleaner environments, and safer economies.



Thank you

For more information, please contact:

Elena Jardan: jardane@who.int

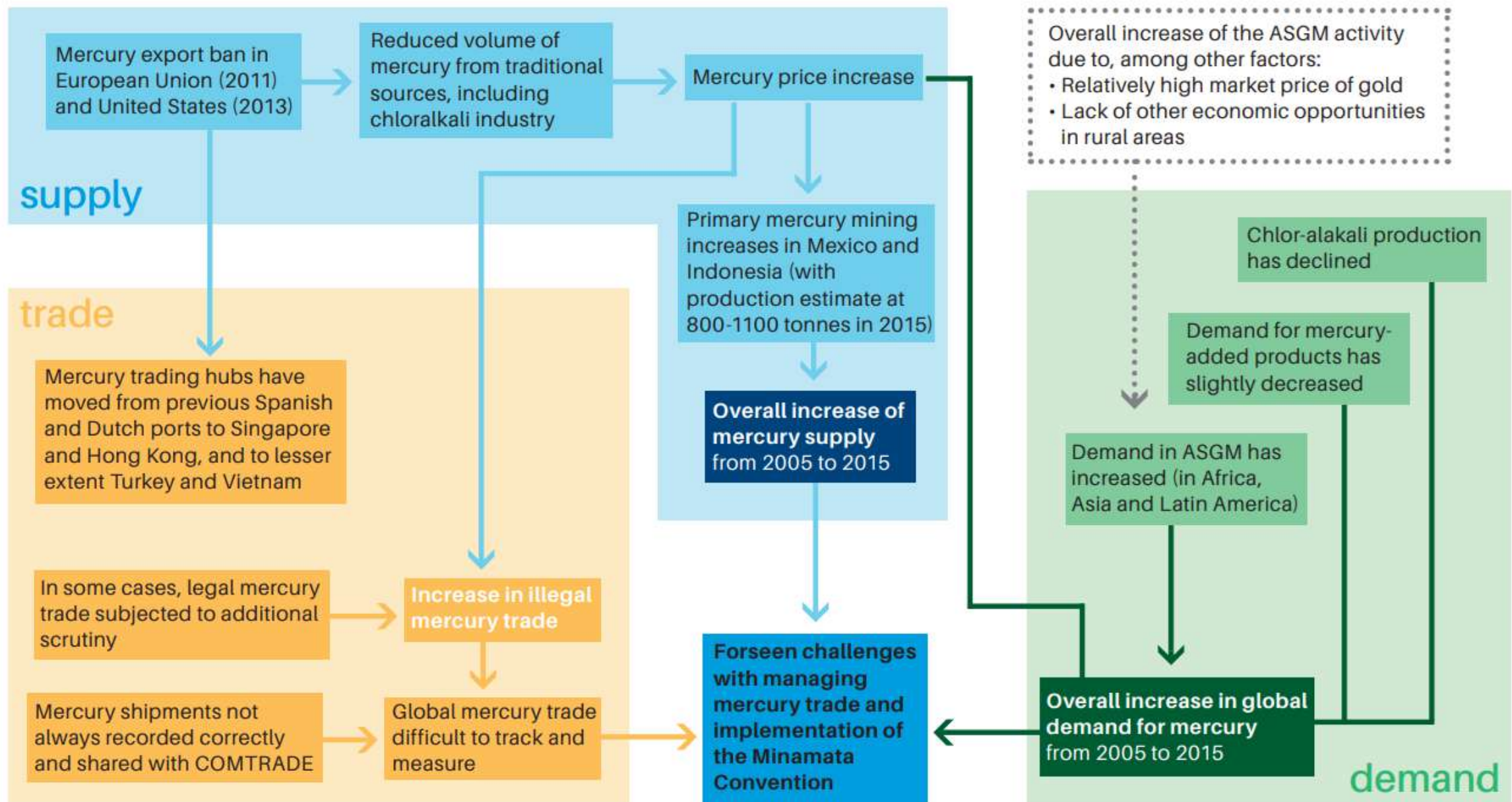
This presentation has been designed to be accessible, for a positive and inclusive user experience for all.





Overview of global mercury trade regulations under the Minamata Convention and Basel Convention

Malgorzata Stylo, UNEP

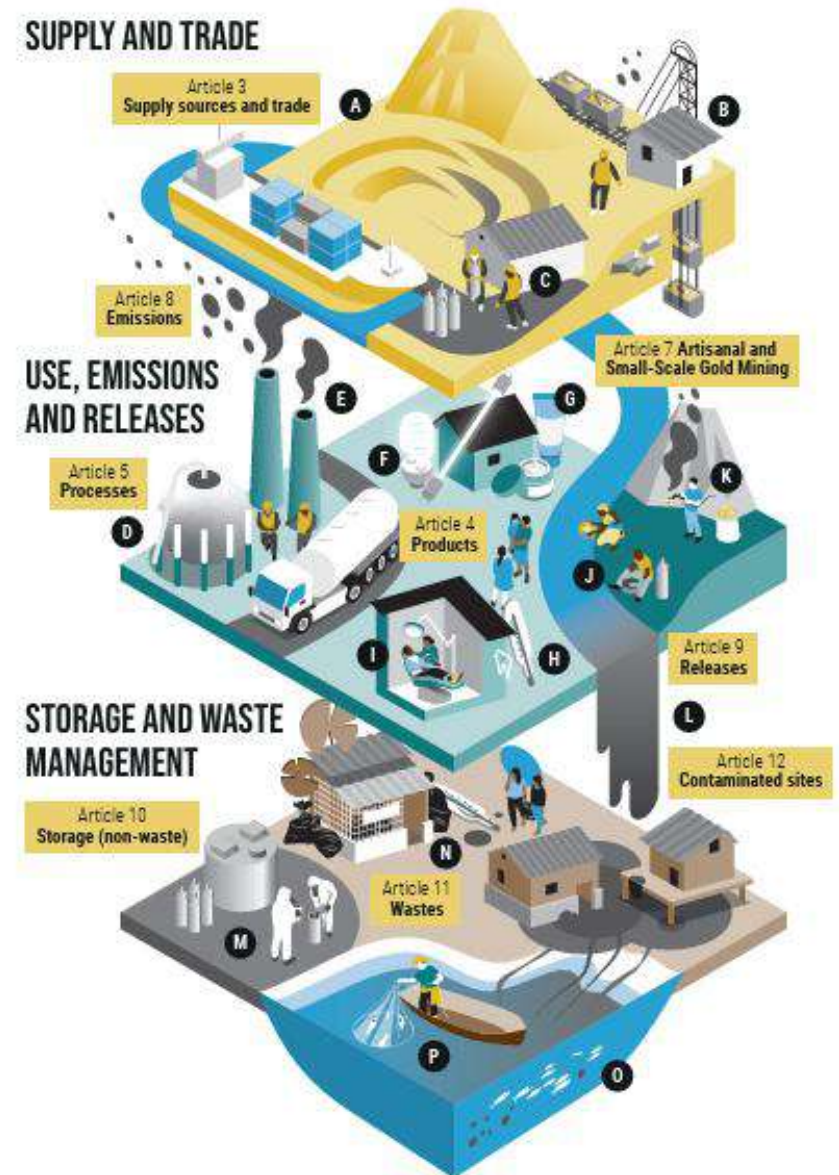




Minamata Convention on Mercury

Objective: to **protect the human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds**

- Adopted in October 2013, entered into force in August 2017
- 152 Parties, as of June 2025



Mercury trade under the Minamata Convention

Article 3 on mercury supply sources and trade requires Parties to take measures to control trade of mercury with other Parties as well as with non-Parties and reinforces demand reduction control measures (Articles 4-7)



Export of mercury is **allowed**, with Consent of the importing country (Party or non-Party) to be obtained before export, for:

- A. Mercury from the decommissioning of chlor-alkali facilities
- B. Environmentally sound storage
- C. Use in artisanal and small-scale gold mining
- D. Primary mercury mining that was not being conducted at the time of entry into force of the Convention
- E. Mercury-added products after the phase-out deadlines



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- E. Mercury-added products after the phase-out deadlines



Summary of Article 3 trade provisions

- Not allow the EXPORT of mercury unless the importing country provides **written consent**, the mercury is for an **allowed use or environmentally sound storage**, and all other conditions of Article 3.6 are met.
- Not allow the IMPORT of mercury without government **consent**, ensuring both the mercury **source and proposed use** are allowed under the Convention (and applicable domestic law).
- Restrict the export and use of mercury from **primary mercury mining**, so that it is not available for use in artisanal and small-scale gold mining (ASGM).



**Provisions
Effective
immediately
upon Entry
into Force
for the
Party**

Implementation of decision MC-5/2 –Challenges to Article 3 implementation

In response to [Decision MC-5/2](#) on mercury supply sources and trade, the Secretariat is compiling information on experiences and **challenges faced in the implementation of Article 3** as well as information on activities undertaken in relation to the **Bali Declaration** on Combating Illegal Trade in Mercury (deadline for submission by Parties is **31 March 2025**).

The [Bali declaration](#) is a non-binding political declaration that was launched by Indonesia at the margins of COP-4.2 in Bali, in 2022. The declaration received expressions of support from regional groups and delegations.

Submissions received so far from: Canada, Burkina Faso, Peru, Senegal, Thailand and Togo. **Main challenges identified:**

- Illegal re-export of mercury
- Illegal transit
- Illegal trade of mercury for ASGM
- Unknown origin of traded mercury
- Information on enforcement response to illegal trade

NOTE: The **Implementation and Compliance Committee** expressed concern regarding the issue of illicit trafficking, illegal trade or smuggling of mercury raised by some Parties in their national reports and decided to re-examine this issue at its next meeting in light of the information compiled by the Secretariat pursuant to paragraph 4 of decision MC-5/2.

The Bali Declaration on Combating the Illegal Trade in Mercury

COP4

March 2022

- Urge parties to develop and implement national policies and regulations to combat illegal mercury trade.
- Strengthen international, regional, and cross-border cooperation, especially among law enforcement networks.
- Encourage collaboration with organizations like INTERPOL, WCO, UNODC, and the Minamata Convention Secretariat.



Implementation of decision MC-5/3 on the study on mercury compounds



In response to [Decision MC-5/3](#), recalling para. 13 of Article 3, the Secretariat has developed this [draft study](#) of the global supply, production, trade and use of mercury compounds.

Comments received so far from:

- Argentina
- Austria
- Brazil
- Burkina Faso
- Canada
- EU
- Japan
- Peru
- NRDC
- NYC Department of Health and Mental Hygiene
- Zero mercury working group

Article 3(13): The Conference of the Parties shall evaluate whether the trade in specific mercury compounds compromises the objective of this Convention and consider whether specific mercury compounds should, by their listing in an additional annex adopted in accordance with Article 27, be made subject to paragraphs 6 and 8.

**Funded
by
Canada
and
Spain**

Trade forms and guidance on the Convention's website



The Convention ▾ Decision-making ▾ Parties ▾ **Implementation ▾** Resources ▾ News ▾

English ▾



Intersessional work

COP Guidance and Forms

Implementation and Compliance Committee

Specific International Programme

Global Environment Facility

Special Programme

Gender

Projects

Youth Engagement

Indigenous Peoples

Through its meetings since 2017, the Conference of the Parties to the Minamata Convention on Mercury has adopted forms and guidance to assist Parties with its effective implementation. **These forms and guidance, as adopted, are presented below.**

Article	Adopted	Title	File	Further Information
3	COP1 MC-1/3	Guidance in relation to mercury supply sources and trade in relation to certification	Download	More info on Annex II to document UNEP/MC/COP.1/6
3	COP1 MC-1/2	Guidance on completing the forms required under article 3 related to trade in mercury	Download	
3	COP1 MC-1/2	Forms related to Article 3 on Mercury trade	Download	



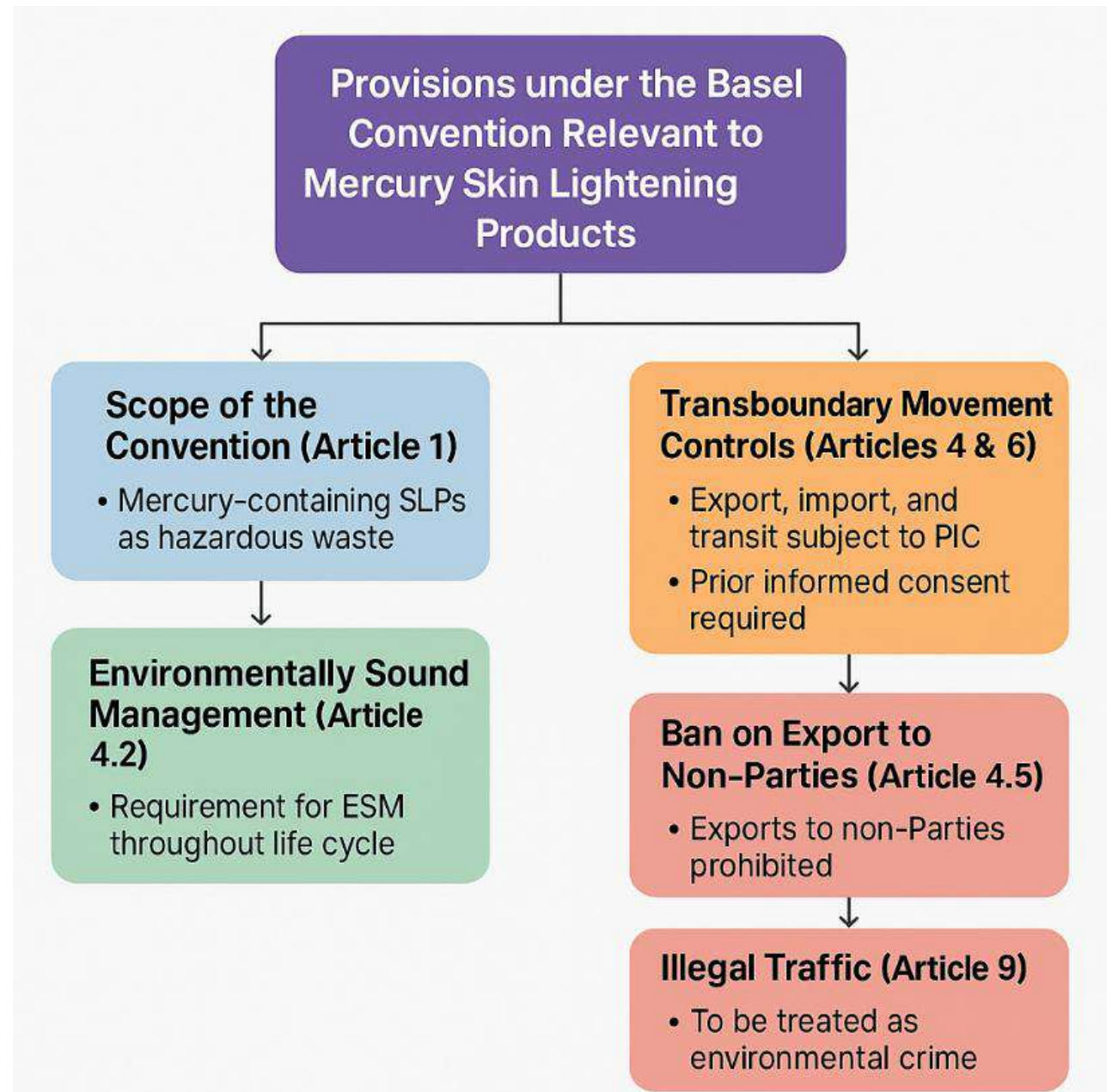
Sixth meeting of the Conference of the Parties to the Minamata Convention on Mercury (COP-6)



Geneva, Switzerland, 03 Nov 2025 - 07 Nov 2025

Trade of mercury waste

Basel Convention has provisions for Prior Informed Consent (PIC) procedure, which mandates that mercury waste shipments can only occur if the importing country has authorized it and is equipped to manage the waste safely

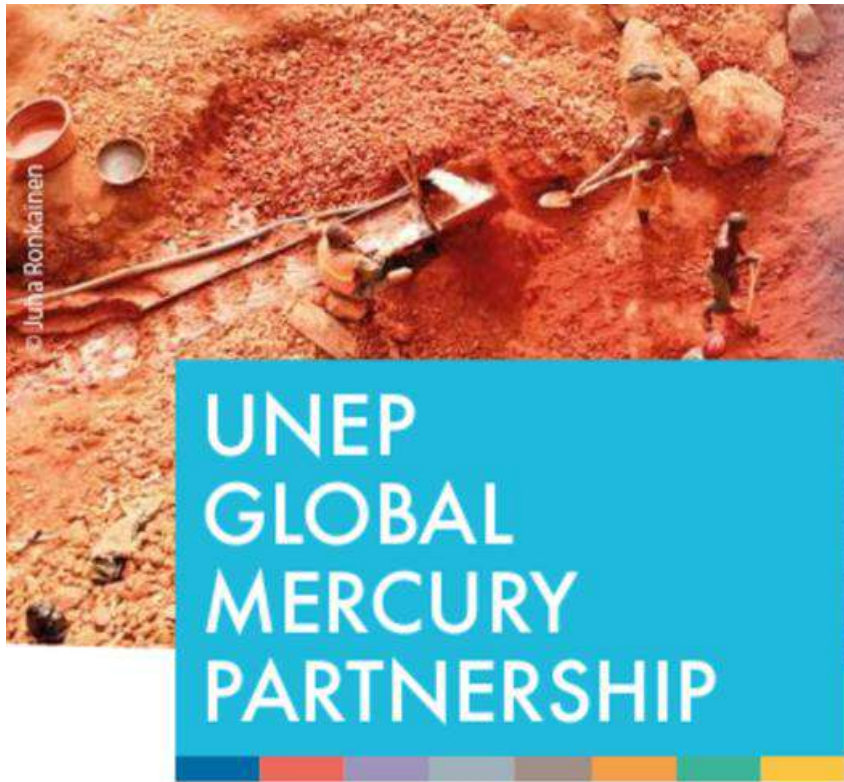




Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade

The Rotterdam Convention regulates hazardous chemical and pesticide trade through prior informed consent, adding substances to Annex III based on regional notifications or risks to developing countries.

The **PIC procedure covers mercury compounds**—including inorganic, alkyl, alkyloxyalkyl, and aryl forms—listed as “Pesticides” in Annex III, though their use extends beyond pesticides.



- ✓ Support implementation of the Minamata Convention
- ✓ Provide knowledge and science on mercury
- ✓ Deliver outreach and awareness raising towards global action

Over 260 partners from: Governments, IGOs, NGOs, Industry /private sector, academia and the scientific community **from around the world**

The Partnership is structured around eight areas:

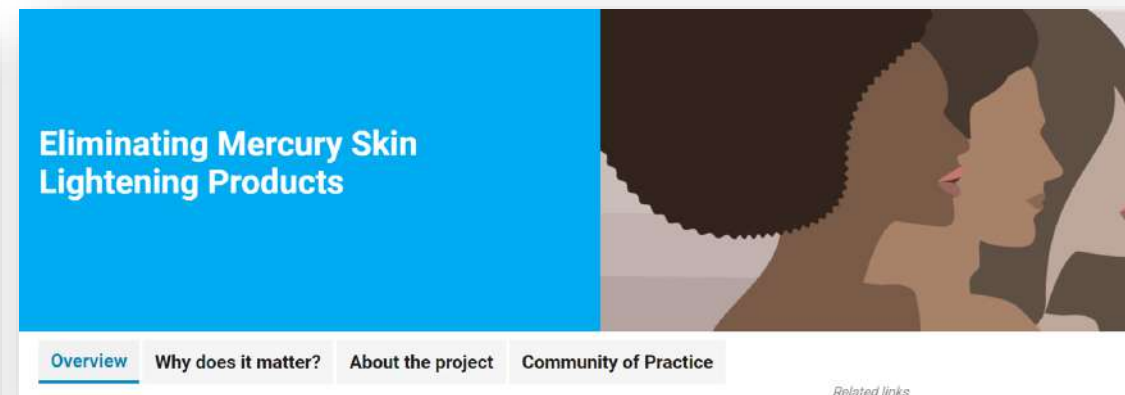
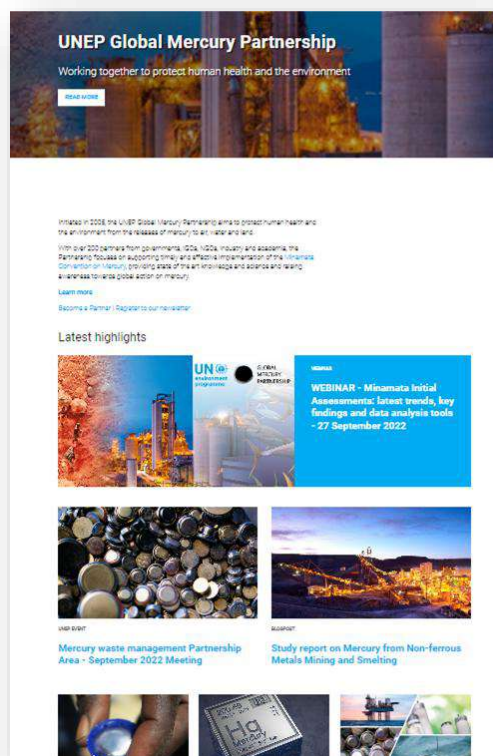
- Artisanal and small-scale gold mining
- Mercury cell chlor-alkali production
- Mercury air transport and fate research
- Mercury in products
- Mercury releases from coal combustion
- Mercury waste management
- Mercury supply and storage
- Mercury releases from the cement industry

Knowledge management and information exchange

Opportunities:

- **Knowledge hub** on mercury trade
- **Online session** to exchange latest information on trade and other relevant related topics, including online sales and trade in mercury compounds

website: [Home | Global Mercury Partnership \(unep.org\)](https://www.unep.org/global-mercury-partnership)



18 APR 2024 |

Webinar - Contribution of the chemicals and waste Conventions to Target 7 of the Kunming-Montreal Global Biodiversity Framework

(This event is for National Focal Points to the biodiversity and chemicals and waste Conventions and other government officials)



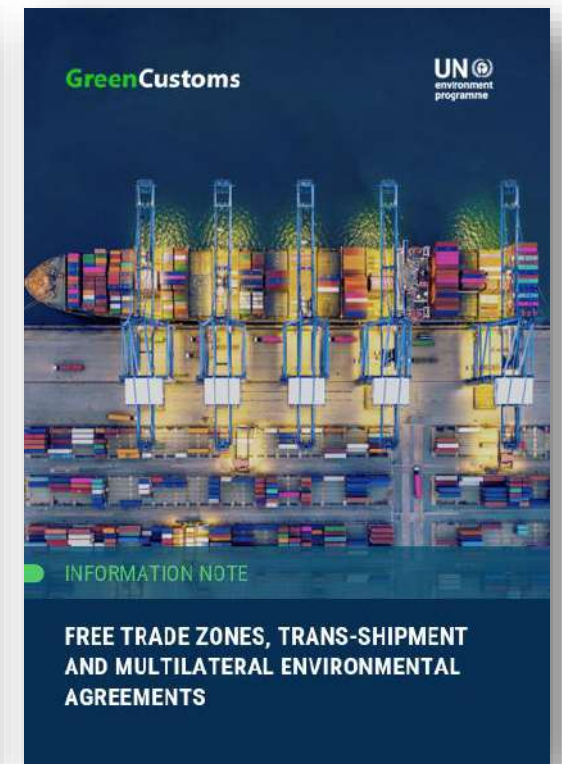
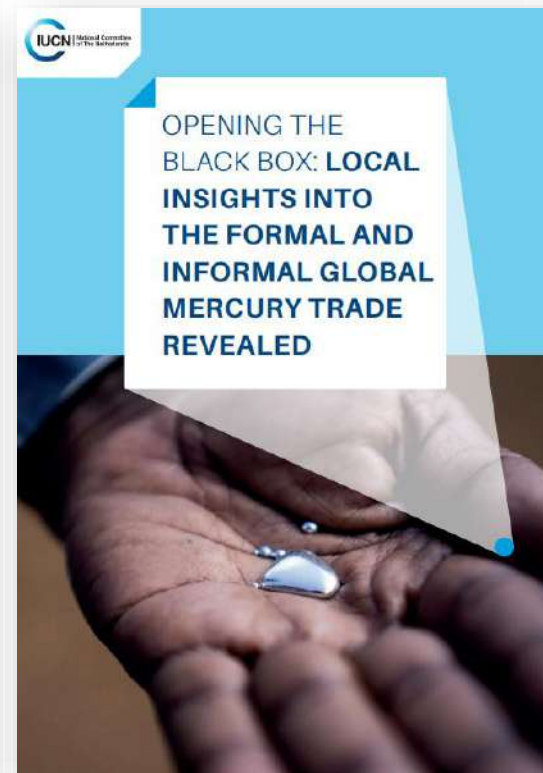
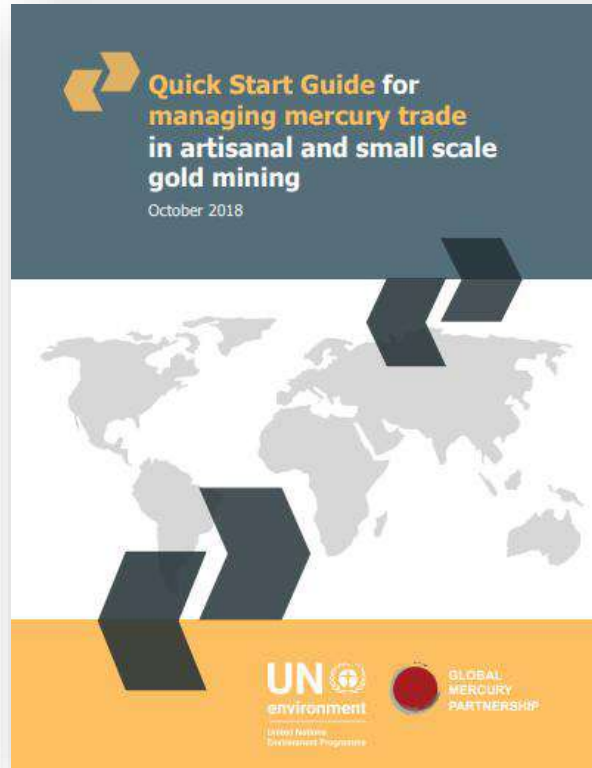
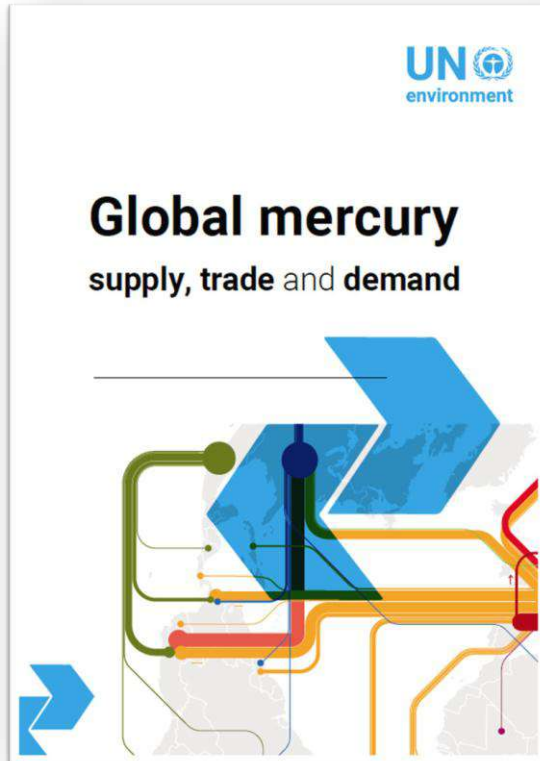
21 MAR 2024 |

WEBINAR - Mercury from Non-Ferrous Metals Mining and Smelting: current knowledge and tools towards sustainable practices

The Global Mercury Partnership organised a webinar on Mercury from Non-Ferrous Metals Mining and Smelting: current knowledge and tools towards sustainable practices, on Thursday 21 March 2024.



Information Resources



GLOBAL
MERCURY
PARTNERSHIP



Thank you

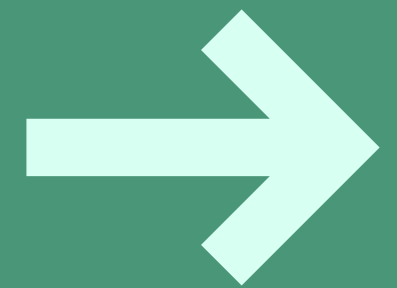


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Regional Responses to Mercury Trade – The Bali Declaration

Ministry of Environment Indonesia



Global Mercury Challenge

Overview of mercury sources and their harmful effects

01

Mercury is a global pollutant—toxic, persistent, and transboundary.

02

Widely used in illegal gold mining, industrial processes, and consumer products.

03

Linked to serious health impacts, especially in children and vulnerable communities.

04

Despite the Minamata Convention, illicit trade continues.

- Calls for regional cooperation to control illegal mercury trade.
- Focuses on transparency, enforcement, intelligence sharing, and technical support.
- Recognizes the need for tailored national action plans.

The Bali Declaration (2022)

Regulatory Alignment:
Harmonizing national regulations.

Strengthened Enforcement: Joint
task forces and maritime
monitoring.

Data and Intelligence Sharing:
Real-time exchange of trade
data.

Capacity Building: Technical
training and legal support.

Key Elements of the Bali Declaration

Mercury Trade Routes in Asia

Source countries: Known producers and stockpiles.

Transit countries: Weak controls or corruption-prone areas.

Destination: Mostly tied to artisanal and small-scale gold mining (ASGM).

Current Challenges



Limited tracking capabilities at borders.



Lack of standardized reporting on mercury movement.

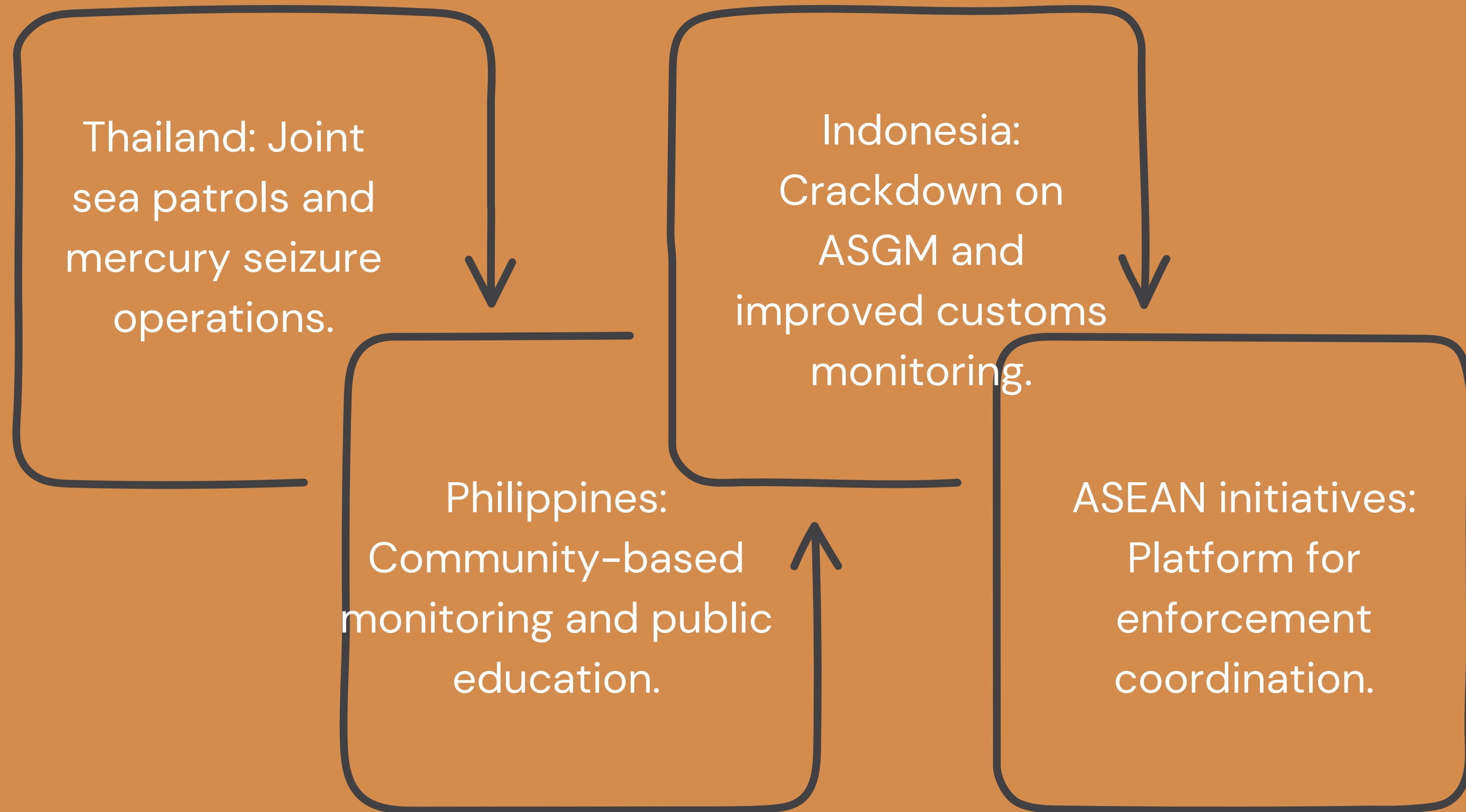


Insufficient coordination among national agencies.



Undercover shipments disguised as other chemicals.

Regional Responses in Action



Next Steps

Finalize national roadmaps based on Bali Declaration principles.

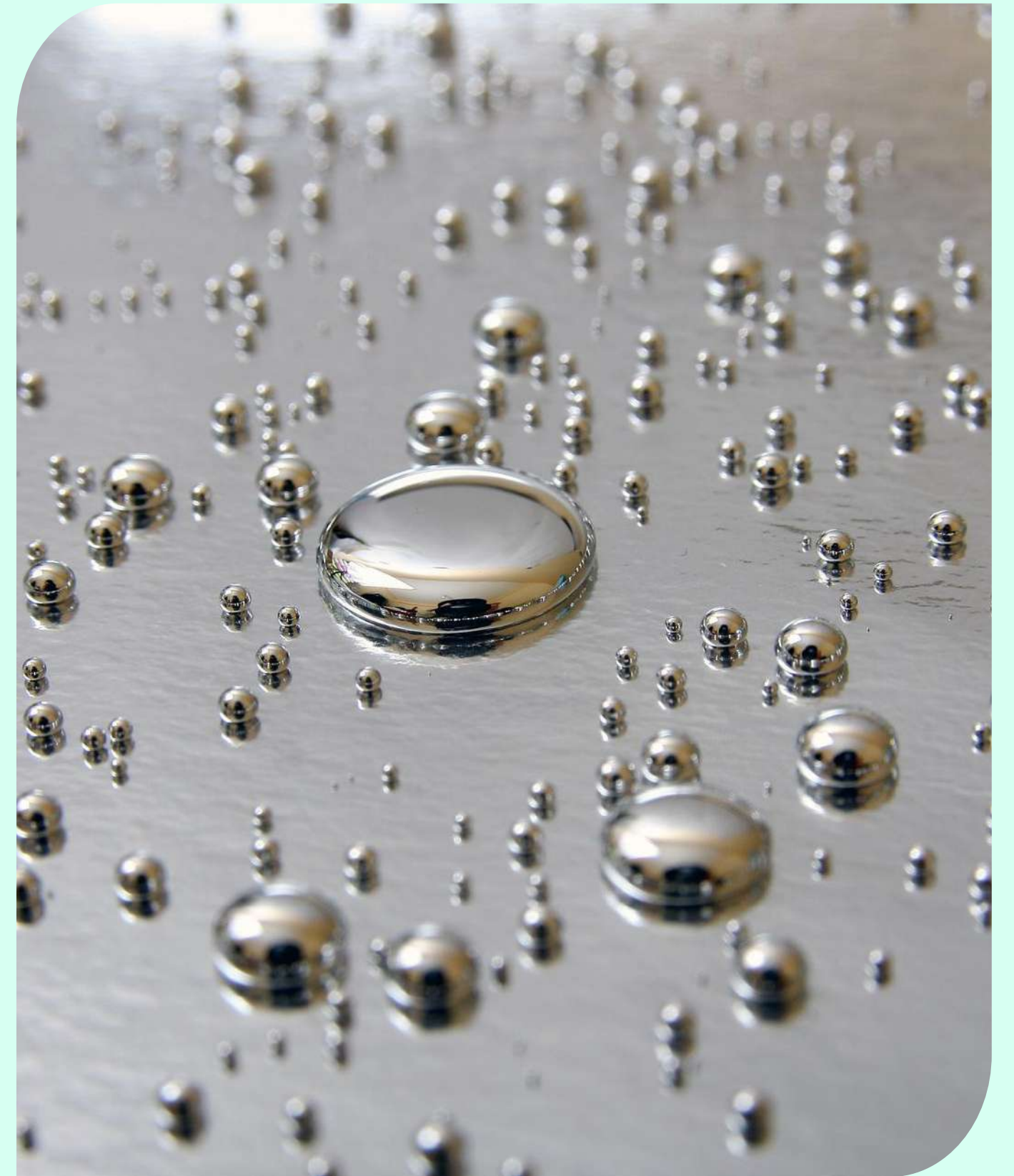
Establish regional mercury trade task force.

Continue data sharing and capacity-building programs.

Report back progress at Minamata COP and regional forums.

Mercury

“Mercury knows no borders — and neither should our cooperation. The Bali Declaration is not just a document — it's a call to action.”





Indonesia's Experience in Drafting Guidelines for Handling Seized Mercury and Cinnabar

Dyah Paramita, SH, LLM
Senior Legal Researcher
mita@crpg.info

An introduction to CRPG

The Center for Regulation, Policy and Governance (“CRPG” or “the Center”) is a non-profit **think tank, research-based advocacy, and consultancy** institution founded in 2011. The Faculty of Law at Universitas Ibn Khaldun in Bogor, Indonesia hosts our secretariat. CRPG adopts a multidisciplinary approach to regulatory and policy challenges. The Center pushes the boundaries of knowledge by engaging in academic research in partnership with various research institutions and organizations worldwide.

Mercury Project

Since 2019 until early 2025, CRPG has been working together with the Biodiversity Research Institute and Nexus3 Foundation on the project ***“Reducing Mercury Use in Artisanal and Small-Scale Gold Mining in Indonesia.”***



Indonesian National Action Plan on Mercury Elimination and Reduction (Presidential Decree No. 21/2019)

Mandates	Targets
Supervising and controlling unlicensed primary mercury (cinnabar) mining activities	Eliminate all unlicensed cinnabar mining and the use of mercury in ASGM by 2025.
Supervising the distribution of mercury	Eliminating the distribution of mercury by 2025
Enforcing regulations on the use and circulation of mercury in artisanal and small-scale gold mining (ASGM).	Eliminate the use of mercury in ASGM by 2025.
Law enforcement for the illegal trade/use of mercury	10 tonnes per year until 2025

We are collecting and analyzing court decisions pertaining to mercury and cases involving mercury (e.g elemental mercury use in ASGM and trade, and cinnabar trade/refinery).

REFLECTIONS – Current Conditions

Since 2018, we have maintained a database of more than 80 court decisions (verdicts).

The database includes information such as the year, case numbers, legal basis, individuals involved, the amount of confiscated mercury/cinnabar, court orders regarding the disposal or management of seized goods, and criminal penalties.

1. Law being used:

- Trade Law
- Mineral and Coal Mining Law
- Trade Law
- Criminal Law
- Environmental Law

2. Unit being used to measure mercury:

- Bottles/half bottles
- Jerry cans
- Tubes
- Ounce/gr/kg
- Tubes/boxes
- etc

3. The management of seized mercury/cinnabar based on verdicts:

- The mercury is **confiscated for the state** -- handed over to the Ministry of Energy and Mineral Resources (ESDM)/Ministry of Environment and Forestry (KLHK)/Provincial Office
- The mercury should be **destroyed** – what does it involve and how?
- The mercury will be **used for another case in court** – is a photo sufficient?
- **The mercury is returned to the state** – what to do?
- **The mercury is returned to alleged offender** – this should be stop.

4. Challenges:

- There is no specific guide for the law enforcement officers
- At the local levels there are **not enough sufficient and safe interim/temporary storages** for the confiscated mercury.
- At the national level, Indonesia does not have facility to treat mercury, **what to do with the seized/confiscated mercury?**
- **What to do with the confiscated cinnabar?**



Alat termometer laboratoriu...

Rp460.000

Arjuna Tunggal



Alat termometer laboratoriu...

Rp150.000

1 terjual
Kab. Tangerang



14 gr Alat laboratorium ...

Rp330.000

Bunda yuli



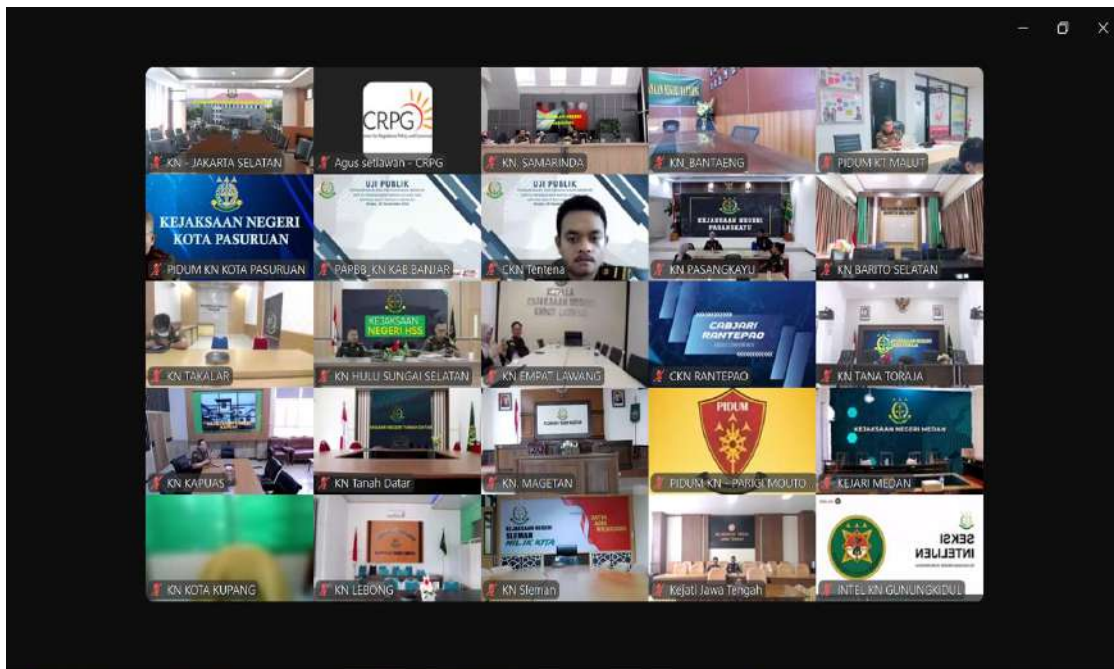
Documentation: Nexus3, Indonesian
Police, Onlineshop Tokopedia



- In July 2023, in cooperation with the **AGO**, we began **drafting a guideline for public prosecutors on handling confiscated/seized mercury**.
- The drafting process involves various stakeholders: prosecutors, technical experts, legal experts, resource persons from the Ministry of Environment, a representative from DENR Philippines (online), and NGOs.



Major questions remains: **What should be done with the confiscated mercury and cinnabar at the final stage? Should we ship them overseas for treatment? How can we establish facilities to stabilize or solidify mercury in the country?**





KEJAKSAAN REPUBLIK INDONESIA
Biro Hukum dan Hubungan Luar Negeri

UJI PUBLIK

Pengurangan dan Penghapusan Merkuri Serta
Penanganan Benda Sitaan dan Barang Bukti
Berupa Merkuri



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INDONESIAN CENTRE FOR
ENVIRONMENTAL LAW



Ari Sugasri, S.H
DIREKTUR PENGELOLAAN BAHAN
BERBAHAYA DAN BERACUN KLHK



Dr. Asep Kurniawan Cakraputra
KOORDINATOR PADA KEJATI BANTEN



KEYNOTE SPEAKER
DADO A. EKRONI, S.H., M.Kn.
Pj. Kepala Biro Hukum &
Hubungan Luar Negeri



MODERATOR
Dr. RATIH ANDRAWINA SUMINAR
KOORDINATOR PADA KEJATI BANTEN

Save The Date

 **SELASA**
24 September
2024

 **PUKUL**
09.00-SELESAI

Join Now !

 **zoom**

Meeting ID: 988 3842 1464
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@birkumhublu.kejaksaanri



**Terima Kasih
Thank You!**

More information:

<https://crpg.info/merkuri/>

<https://www.nexus3foundation.org/programs/merkuri/>

<https://briwildlife.org/hgcenter/artisanal-small-scale-gold-mining/asgm-projects-indonesia/>

GUIDELINES ON THE REDUCTION AND ELIMINATION OF MERCURY AND HANDLING OF CONFISCATED MERCURY

DR. RATIH ANDRAWINA SUMINAR
ATTORNEY GENERAL OFFICE OF INDONESIA



GEOLOGICAL OF INDONESIA

Indonesia is made up of over 17,000 islands, and many of them were formed through volcanic eruptions. In fact, Indonesia has more than 120 active volcanoes. The constant activity beneath the Earth's crust also leads to frequent earthquakes, some of which can trigger tsunamis.

Indonesia is also rich in natural resources, thanks to its complex geological history. Its soil is fertile due to volcanic ash, supporting lush rainforests and agriculture. Indonesia is rich in **oil, gas, coal, gold, copper, tin, and nickel**.



SOCIO-ECONOMIC PROFILE

Indonesia has a dynamic socio-economic profile, shaped by its vast population, diverse culture, and growing economy. Indonesia is the 10th largest economy in terms of purchasing power parity. The economy has been growing steadily, with a 5.0% GDP growth rate in 2023. The key sectors include manufacturing, agriculture, mining, and services. Indonesia has over 281 million people (2023), making it the 4th most populous country and the poverty rate has dropped significantly, reaching 9.36% in March 2023.

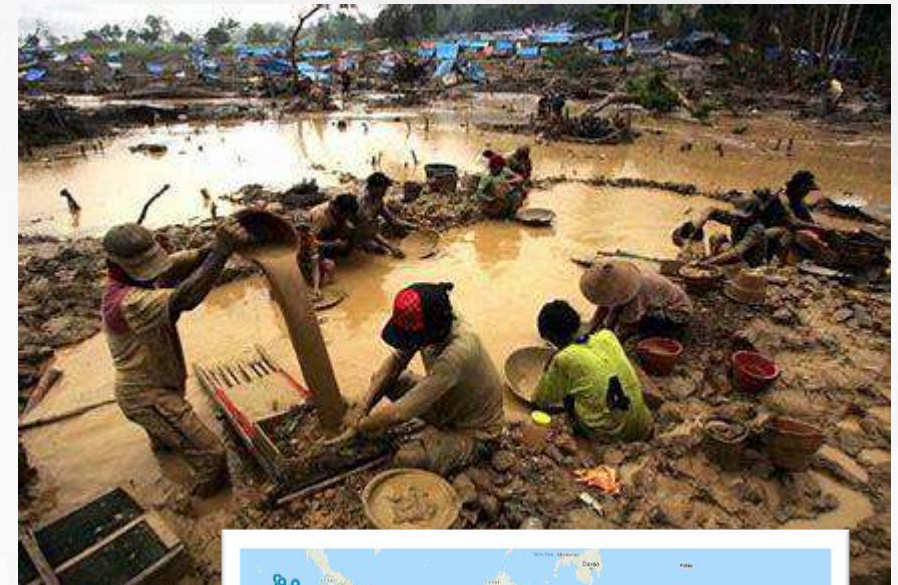
Indonesia has been actively working to regulate the trade of mercury, mercury compounds, and mercury-added products, especially following its ratification of the Minamata Convention on Mercury through Law Number 11 of 2017.

Indonesia has restricted mercury trade to reduce environmental and health risks. The government has implemented Presidential Regulation No. 21/2019, which outlines a National Action Plan for Mercury Reduction and Elimination. Mercury imports and exports are strictly monitored, with efforts to phase out mercury use in small-scale gold mining.

Mercury is primarily used in artisanal and small-scale gold mining (ASGM), which is a major contributor to mercury pollution. Based on baseline data in 2018, the ASGM locations spreading across Indonesia were 180-220 ASGM locations, located in 30 provinces or 180 cities/districts. Other industries, such as batteries, medical equipment, and fluorescent lamps, also use mercury, but regulations are pushing for alternatives.

Illegal mercury trade remains a concern, with black-market transactions still occurring. Efforts are being made to educate miners and industries on safer alternatives and mercury-free technologies.

NATIONAL SITUATION OF TRADE OF MERCURY, MERCURY COMPOUNDS AND MERCURY ADDED PRODUCTS



Map of ASGM distribution in Indonesia (source: Nexus3)

LEGAL FRAMEWORK AND MERCURY TRADE CONTROL



Indonesia has established a legal framework to regulate and control the trade of mercury, aligning with international commitments like the Minamata Convention on Mercury. Law No. 11/2017 ratifies the Minamata Convention, committing Indonesia to mercury reduction.

Presidential Regulation No. 21/2019 outlines the National Action Plan for Mercury Reduction and Elimination, focusing on small-scale gold mining and industrial mercury use. Minister of Trade Regulation No. 48/M-Dag/Per/7/2015 governs import and export provisions for hazardous materials, including mercury. Minister of Forestry and Environment Regulation No. P.36/2017 requires registration and notification of hazardous and toxic materials.

Mercury trade is strictly regulated, with enhanced supervision on imports and exports. Indonesia also has strengthened criminal sanctions against illegal mercury trade. Customs Law No. 17/2006 provides administrative and criminal penalties for violations in mercury trade.

Despite regulations, black-market mercury trade remains a concern and Indonesia collaborates with global organizations to combat illegal mercury trade.

MERCURY TRADE INFORMATION AND REPORTED CASE OF ILLEGAL TRADE OF MERCURY

Indonesian authorities have confiscated significant amounts of mercury in efforts to curb illegal trade. Between **2017 and 2023**, a total of **44,724.41 kg of mercury** and **8,753.41 kg of cinnabar** were seized. However, experts suggest that the actual figures could be higher due to ongoing illicit mercury trade. However, since the European Union and the United States banned mercury exports in 2015, Indonesia has become one of the world's largest mercury producers and exporters, reaching 635 tons in 13 countries (UNEP, 2017).

Several cases of illegal mercury circulation and trade in Indonesia have been processed in court, resulting in court decisions. Based on court decision data published by the Supreme Court of the Republic of Indonesia, the following table shows a recapitulation of the amount of confiscated mercury and cinnabar recorded from 2017 to 2023:

Year	Confiscated mercury (kg)	Confiscated cinabar (kg)
2017	5,578.50	5,125.11
2018	13,293.57	3,561.30
2019	357.00	0
2020	2,249.00	6.00
2021	19,921.00	61.00
2022	3,253.29	0
2023	72.05	0
Total	44,724.41	8,753.41

Recapitulation of the number of mercury and cinnabar seized in Indonesia in 2017-2023
(Source: database of court decisions of the Indonesian Supreme Court summarized by CRPG)

GUIDELINES ON THE REDUCTION AND ELIMINATION OF MERCURY AND HANDLING OF CONFISCATED MERCURY

PRINCIPLE

Preservation and sustainability

Every individual bears the obligation and responsibility towards future generations and their peers in the same generation by making efforts to preserve the carrying capacity of ecosystems and improve the quality of the living environment;

- Harmony and balance

The utilization of the living environment must consider various aspects such as economic, social, cultural interests and the protection and preservation of ecosystems;

- Integration

The protection and management of the living environment are carried out by integrating various elements or synergizing various related components;

- Precautionary principle

Uncertainty regarding the impact of a business and/or activity due to limitations in the mastery of science and technology is not a reason to delay actions to minimize or avoid threats to pollution and/or damage to the environment; and

- Polluter pays principle

The responsible party whose business and/or activities cause pollution and/or environmental damage must bear the costs of environmental recovery.

REDUCTION AND ELIMINATION MERCURY

One of the strategic implementation to achieve the above target is strengthening the law enforcement activities, where the role of law enforcement, particularly to the Attorney General's office, is listed in Appendix-II of Presidential Regulation Number 21 of 2019, as described below:

- Supervising and controlling illegal activities of primary mercury mining (cinnabar mining);
- Monitoring the circulation of mercury in the country;
- Controlling illegal ASGM that uses mercury;
- Controlling the illegal Mercury trade system; and
- Monitoring of distribution of mercury-containing medical equipment.

The Prosecutor's Office plays a role in the Elimination of Mercury based on the NAP-REM in priority areas such as small-scale gold mining and health, which is a directive task carried out through the duties and functions of intelligence by conducting investigations, security measures, and mobilization with the responsible agencies and other supporting agencies in accordance with the NAP-REM. In terms of activities to enhance supervision and enforcement followed by judicial processes, the intelligence continues to provide support the judicial process, both for personnel, mercury as evidence, and the course of the judicial process.

NAP	Sector	Target	Year	Remark
Reduction	Manufacturing	50%	2030	Mercury reduction in the production of batteries and lamps.
	Energy	33,2%	2030	Reduction of mercury emission to the atmosphere
Elimination	Small Scale Gold Mining (ASGM)	100%	2025	Closing down ASGM using mercury (180-220 locations)
	Health	100%	2020	Phasing out of mercury containing equipment on healthcare facilities (21,663 units)

National Action Plan – Reduction and Elimination of Mercury (NAP-REM) 2018-2030

Proposed Procedures for Handling Evidence/Confiscated Mercury



Procedures implemented by the law enforcers (attorney/police) for handling evidence/confiscated mercury retrieved from the ASGM sector, shall be consistent with the procedures established in the laws and regulations related to mercury elimination in Indonesia. These include: recording, temporary storage and treatment/disposal of confiscated mercury.

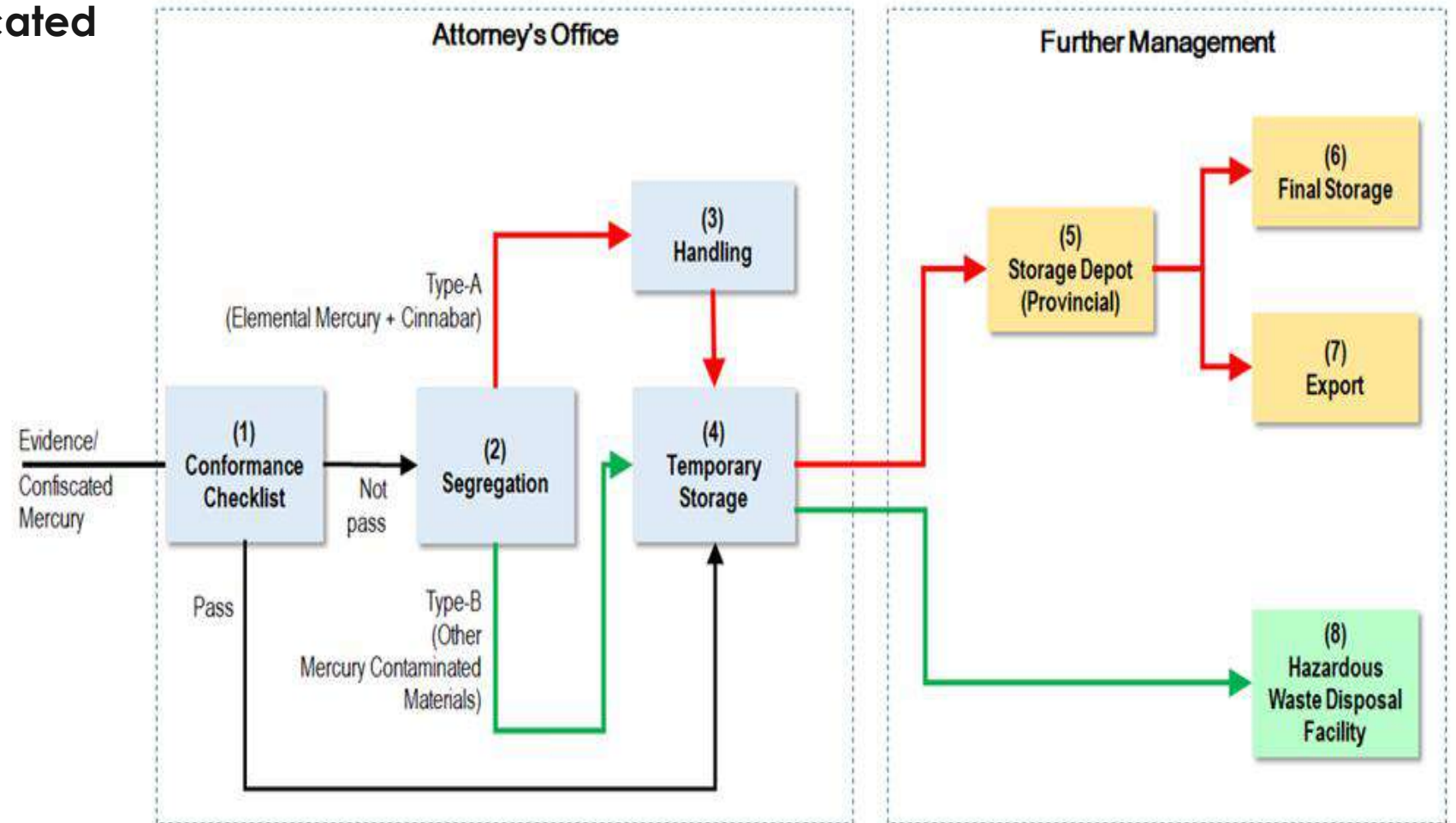
The treatment/disposal for each type of evidence/confiscated mercury is different. Therefore, its preliminary handling will also be different. Likewise, the nature of the hazards of each evidence/confiscated mercury is different from one another, whereas the security requirements of liquid elemental mercury is stricter than the other evidence/confiscated mercury. This is to protect the law enforcers from mercury exposure, either through direct or indirect contact, during handling illegal ASGM cases,

Mercury Production	Mercury Trade/Distribution	Mercury Use (ASGM)
• Elemental mercury (liquid) • Cinnabar • Mercury Production Equipment • Mercury-Contaminated Materials/Waste	• Elemental mercury (liquid)	• Elemental mercury (liquid) • Gold production Equipment contaminated with mercury • Mercury-Contaminated Materials/Waste

Types Evidence/Confiscated Mercury Retrieved from ASGM Sector

Flowchart of Porposed Procedure for Managing Evidence/Confiscated Mercury

This flow diagram of the procedure for handling conviscated mercury is identical to the handling of mercury containing medical devices retrieved from healthcare facilities, as stipulated in the Regulation of the Minister of Environment and Forestry Number P.27/MENLHK/SETJEN/KUM.1/12/2020 concerning Waste Management of Mercury-Containing Medical Devices and Regulation of the Minister of Health Number 41 of 2019 concerning the Elimination and Retrieval of Mercury-Containing Medical Devices in Healthcare Facilities.



Conformance Checklist

No	Requirements	Result	
1	Sorting of conviscated mercury types (Type-A/Type-B)	☐ Yes	☐ Tidak
2	Primary packaging Conviscated mercury is over-packaged in secondary packaging	☐ Yes	☐ No
3	Primary/secondary packaging is in good condition (no leaks or potential leaks)	☐ Yes	☐ No
4	Primary packaging is tightly sealed with structural stability (leak-proof) to avoid Mercury spillage due to brittleness or breakage that may occur and prevent Mercury vaporization.	☐ Yes	☐ No
5	Primary packaging is able to withstand the heavy pressure of mercury and does not react with mercury.	☐ Yes	☐ No
6	Primary packaging is made of materials that do not react with Mercury or are made of materials compatible with the contents, for example: steel or polyethylene.	☐ Yes	☐ No
7	Secondary packaging is hermetically sealed and structurally stable (leak-proof)	☐ Yes	☐ No
8	Secondary packaging made of materials that do not react with Mercury or made of materials compatible with the contents, for example: steel or polyethylene	☐ Yes	☐ No
9	Secondary packaging is equipped with a symbol	☐ Yes	☐ No

For the safety of personnel involved in law enforcement, ideally the sorting/segregation and handling of evidence/conviscated mercury shall be performed at earliest stage, i.e. right after the collection of evidence/confiscated objects by investigators. However, the Prosecutor's Office needs to verify the conformity of the conviscated mercury to the requirements, using the checklist form as listed in Table.

If the verification results indicate that the conviscated mercury, received from investigators, meets the requirements as required in the checklist, the Prosecutor's Office may immediately place the conviscated mercury in dedicated temporary storage for conviscated mercury. If the inspection results show that the requirements for temporary storage are not met, then the evidence/confiscated items received need to be sorted and/or handled before temporary storage is carried out.

Segregation of Evidence/ Confiscated Mercury Types

Segregation of confiscated mercury is necessary prior to temporary storage for the following reasons:

1. Liquid elemental mercury evidence/confiscations are far more dangerous than other confiscated mercury (e.g. contaminated equipment/materials) and therefore require preliminary handling before storage. This includes one or more of the following handling: inspection/evaluation, repackaging, over-packing and symbol/labeling.
2. The final management (treatment/disposal) by the government for confiscated elemental mercury and cinnabar will be different from other forms of confiscated mercury. Elemental mercury and cinnabar are supposed to be permanently stored in Permanent Storage Facility and/or exported to other countries, where trans boundary movement is still possible.

Once the confiscated mercury is received from the investigators, the prosecutor's office sorted the evidence/ confiscated mercury into 2 main types, namely:

- a. Type-A confiscated mercury: Elemental Mercury and Sinabar



- b. Type-B confiscated mercury: Other confiscated mercury, including: – Mercury refining equipment from cinnabar (contaminated with mercury) – Gold refining equipment (contaminated with mercury) – Mercury-contaminated materials/waste – and other similar goods



For Type-A Confiscated Mercury, preliminary handling is required prior to temporary storage, to prevent spillage and/or release of mercury to the environment. Meanwhile, Type-B Confiscated Mercury does not require special handling prior to temporary storage, but simply packaging and marking with appropriate symbols and labels, and ensuring that it is properly packaged.

Handling

Handling of confiscated mercury is particularly carried out on elemental mercury, in order to ensure that the mercury is stored safely and to prevent incidents of spills or other releases of mercury into the environment. The handling includes: re-packing, double packing and marking (symbol/label). For other type of evidence/confiscated mercury, direct storage in a Confiscated mercury Temporary Storage Area (TPS) is possible.



a. Re-packing

Elemental mercury must be placed in primary container that meets the following terms and conditions:

- Properly sealed: Primary container shall be tightly closed and structurally stable (leak proof) to avoid any spillage of mercury due to brittleness or breakage that may occur, and to prevent any vaporization of mercury.
- Strong against the heavy pressure and does not react with mercury. Primary container is made of materials that do not react with Mercury or are made of materials compatible with the contents, for example: steel or polyethylene.

If the primary container of evidence in the form of elemental mercury received from investigators does not meet the above requirements, or there are indications or potential for leakage, then re-packing must be carried out immediately. Repackaging should be done carefully in the following manner:

- Conduct repackaging in an open or well-ventilated room.
- Use appropriate personal protective equipment (PPE) for handling mercury.
- Lay down plastic sheeting in the work area to prevent the spread of mercury in case of spilled/scattered.
- Prepare a new container for elemental (liquid) mercury, either metal or polyethylene mercury flask.
- Transfer the mercury into the new container using a funnel slowly and carefully.
- Put on and tighten the lid of the new package.

Note that this re-packing must be performed by trained personnel, due to the high risk of mercury exposure. For evidence/confiscated cinnabar, repackaging is required if it is in powder form, such that it is susceptible to spillage and scattering, if the packaging is damaged/leaked.

b. Over-packing:

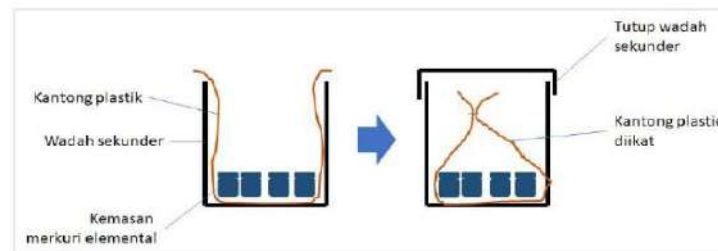
'Over-packing' is an effective spill prevention, where liquid mercury packed in its original packaging, or re-packed packaging, is put into a larger secondary container. These secondary containers can be made of metal or polyethylene plastic with sizes 200 ltr, 100 ltr, 50 ltr or 25 ltr.

The container requirements for this mercury over-packing are:

- packaging made of metal or polyethylene plastic
- packaging is capable of confining hazardous waste to remain inside the packaging;
- has a strong lid to prevent spillage during transfer and/or transportation;
- the condition of the packaging does not leak, does not rust, and is not damaged.

The double packaging procedure can be carried out as follows

- place the secondary container on a pallet;
- place a plastic liner/bag into the drum to prevent direct contact between the mercury and the container in the event of a leak/spill;
- place cushioning material (styrofoam granules) that also serves as a dampening mat at the bottom of the drum;
- put the packaged elemental mercury (liquid) in its original packaging or re-packed into the drum. For elemental mercury packed in 34 kg mercury flasks, one drum can be filled with 6 (six) mercury flasks, resulting in a total weight of approximately 204 kg.



Insert sponge rubber or tight cardboard dividers between the packs, and between the mercury packs and the inner wall of the drum.

- secure the inner plastic bag and put on the drum lid.
- install the drum locking ring and tighten the bolts.

Over-packing is not required for solid materials such as cinnabar, as there is no risk of scattered/spillage.



Symbol and Label Markings

Referring to to the current standard police procedures, evidence and confiscated items that will be used in the trial process, are marked with tags/labels, which contain information like place and date of seizure and police report number. Nevertheless, for evidence/confiscated mercury, additional identification or marking is required related to the communication of mercury hazards to humans and the environment, in the form of symbols and labels.

Symbols and labels for evidence/confiscated items in the form of elemental mercury (liquid) refer to the Regulation of the Minister of Environment No. 03/2008 on the Procedures for Providing Symbols and Labels for Hazardous and Toxic Substances as well as the Global Harmonized System of Classification and Labelling of Chemicals (GHS).

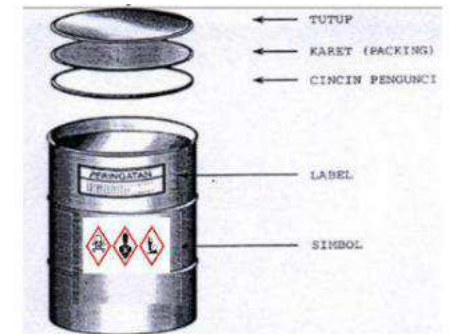
Symbol is a rhombus-shaped figure with a white base color and a red border. The symbol is attached to the conviscated mercury packaging, with the size generally measuring 10 cm x 10 cm. Referring to the Safety Data Sheet (SDS), elemental mercury has hazard characteristics: corrosive, toxic and harmful to the environment.



Labels are Signal Words, such as "Danger" or "Warning" to emphasize the hazard and indicate the relative severity of the hazard. Hazard Statements, phrases that define the nature of the hazard, including: prevention, storage, response and disposal methods.



BAHAYA MERKURI



Temporary Storage of Confiscated Mercury

Temporary storage of confiscated mercury in the Prosecutor's Office must be carried out in a dedicated storage that is safe and preferably separate from other evidence/confiscated storage to prevent the spread of mercury vapor. This dedicated area can be permanent or non-permanent (movable/mobile) space. For non-permanent storage, a 20ft container can be used, with minor modifications to add a ventilation system, lighting and installation of a containment system.

The requirements for this temporary storage space are as follows:

- located in a location that is easily monitored, and away from heat sources and/or potential fires;
- has sufficient area to accommodate confiscated mercury;
- safe from possible leakage to the outside of the storage in the event of a mercury spill/spill (the room is able to contain the spill/spill);
- the storage can be locked and can only be entered by designated personnel (not easily accessible to the public);
- has sufficient lighting and ventilation that is separate from other rooms;
- on the outside of the storage, place a sign showing a mercury hazard symbol and a signboard "Storage of Confiscated Mercury".



For relatively small/light packaging, storage of confiscated mercury may use shelves for efficient use of storage space. For relatively heavy packaging (e.g. 200-litre drum packaging containing mercury flask), placement of packaging can be conducted on the floor of the storage using pallets. If the storage is a mobile container, drums can be stacked in a maximum of 2 stacks. Whereas in the case of a building, the drums can be stacked in a maximum of 3 stacks

During the storage of confiscated mercury, inspections must be carried out, to ensure that all confiscated mercury is stored safely and there is no potential for leaks or spills

Recording & Weighing

Each type of confiscated mercury stored in the storage must be recorded, including information related to: date, type of evidence/confiscation, source, packaging and size, weight, and other necessary information. Particularly for evidence/confiscated elemental mercury, the weight data shall be reported and consolidated nationally through tiered reporting to measure the achievement of mercury withdrawal national targets as specified in the NAP-REM.

Personal Protective Equipment (PPE)

Personnel involved in the management of confiscated mercury, especially those who directly handling mercury re-packaging, will have a potential risk of exposure to mercury vapor. Exposure over long periods of time can pose health hazards, which must be controlled and minimized. Therefore, while working in the storage, personnel should be equipped with appropriate Personal Protective Equipment (PPE).



Emergency Response

Emergencies that may occur during the storage of confiscated mercury in a Prosecutor's Office include elemental mercury spills, fire, and natural disaster: flood, earthquake.

A common emergency situation is an elemental mercury spill/spill during the handling of Type-A confiscated mercury. Spill incidents of elemental mercury are caused by, among others: mercury packaging leaking/breaking/closing off and mercury packaging broken due to dropping/bumping. The emergency program consists of 3 aspects, that are prevention, preparedness, and countermeasures and recovery.



FURTHER MANAGEMENT OF EVIDENCE/CONFISCATED MERCURY

Transportation of Confiscated Mercury

Type-A confiscated mercury

is a liquid elemental mercury and cinnabar (mercury sulfide). The final disposal for this type shall be a permanent storage, where the cinnabar and mercury that has been processed by stabilization/ solidification, is stored in a special storage permanently. Since there is no permanent storage facility available in Indonesia, final disposal (stabilization/solidification and permanent storage) shall be done in facilities in other countries (export).

The transportation of Type-A confiscated mercury from the Temporary Storage is carried out by officials of the Prosecutor's Office to the Storage Depot, after coordination with the DLH Province.

Type-B confiscated mercury

is confiscated mercury in the form of equipment/ materials contaminated with hazardous (B3) waste. As a consequence, the further management of Type-B confiscated mercury shall be performed at a hazardous waste management facility, licensed for the management of hazardous wastes with waste codes of A105d and B101d.

Transportation of Type-B confiscated mercury from Temporary Storage to the hazardous waste management facility shall be carried out by either the investigator/prosecutor or by another party appointed by the investigator/prosecutor.



JUDICIAL PROCESS (1)

General

The Public Prosecutor is obliged to ensure that handling is carried out safely, based on its type and in accordance with the standards set out in these Guidelines.

Pre-prosecution

Taking into account the dangerous nature and persistence of type A Mercury which cannot be destroyed, or processed or sent abroad until the court decision has permanent legal force, the Public Prosecutor can give instructions to the Investigator to hand over the confiscated Mercury to the Authorized Agency for processing or sending abroad.

Prosecution

When the responsibility for the suspect and evidence is handed over, the Public Prosecutor should, as far as possible, not accept confiscated Mercury, but only accept photos and documents. The Public Prosecutor may also submit confiscated mercury to the Authorized Agency for processing or sending abroad.

In the event that the Public Prosecutor does not refer the case to the court and/or stops the prosecution then Type A mercury is handed over to the Authorized Agency for processing or shipping abroad; and Type B mercury, is confiscated for the state by handing it over to a B3 waste manager who has a business license containing technical approval for B3 Mercury waste management activities.

Examination Of Evidence In Court

For the purpose of proof, the Public Prosecutor submits photos and documents of evidence in the form of Mercury. If necessary, a local examination of evidence in the form of Mercury may be carried out with the approval of the judge.



JUDICIAL PROCESS (2)

Criminal Charges

Considering the dangerous nature of Mercury, in principle, mercury evidence must be confiscated for destruction, but considering the persistent nature of Mercury, it can not be resolved through destruction.

The Public Prosecutor filed a charge with the following indictment:

- a. Mercury evidence type A, submitted to the Authorized Agency for processing or shipping abroad; and
- b. Mercury evidence type B, confiscated for destruction by submitting it to the B3 waste manager who has a business license containing the Technical Approval for B3 Mercury waste management activities.

Court Decisions and Legal Remedies

In the event that the defendant is acquitted or released from all criminal charges, the Public Prosecutor is required to file a legal remedy and the mercury evidence type A will still be settled by submitting it to the Competent Agency.

In the event that the verdict on the mercury evidence is different from the demands of the Public Prosecutor, the Public Prosecutor is required to file a legal remedy.

In filing a legal remedy, the Public Prosecutor is required to outline legal arguments supported by good practices and/or jurisprudence in the appeal/cassation memorandum.



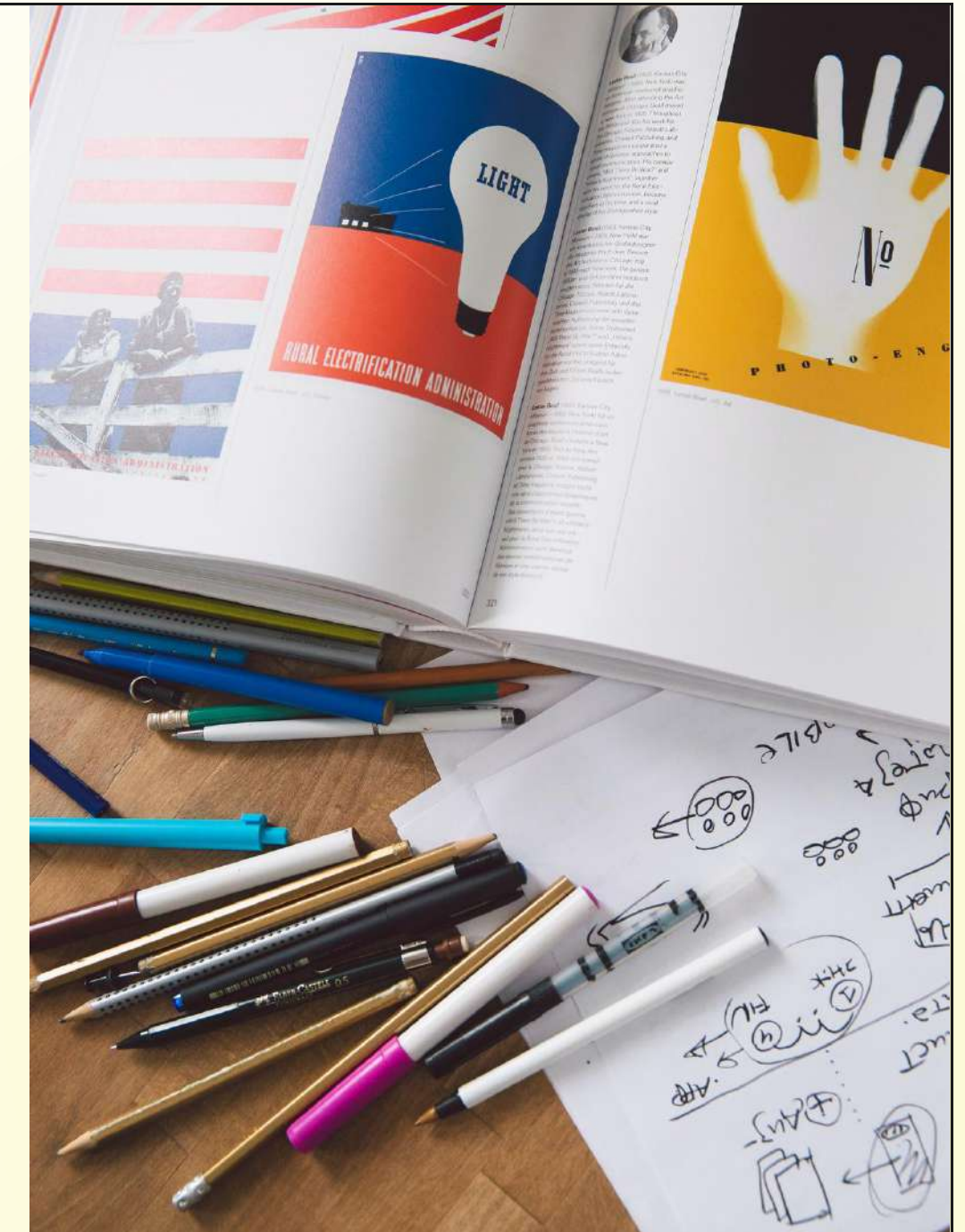
Implementation of the Court Decision

The prosecutor shall implement the court decision that has obtained permanent legal force on mercury evidence by submitting it to the Authorized Agency or B3 waste manager who has a business license containing the Technical Approval for B3 Mercury waste management activities in accordance with the court decision. The implementation of the court decision shall be declared complete when the mercury evidence is handed over from the prosecutor to the Authorized Agency or waste manager. The prosecutor shall supervise and ensure that the mercury evidence is completed.

thank
you

Promoting Interlinkages amongst Agencies such as Customs, Environmental Agencies, National Lab and Legislation –

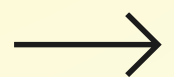
Lessons Learnt from the Eliminating Mercury Skin Lightening Products Project in Sri Lanka



Chalani Rubesinghe

National Coordinator – Project on Eliminating Mercury in Skin Lightening products
Sri Lanka

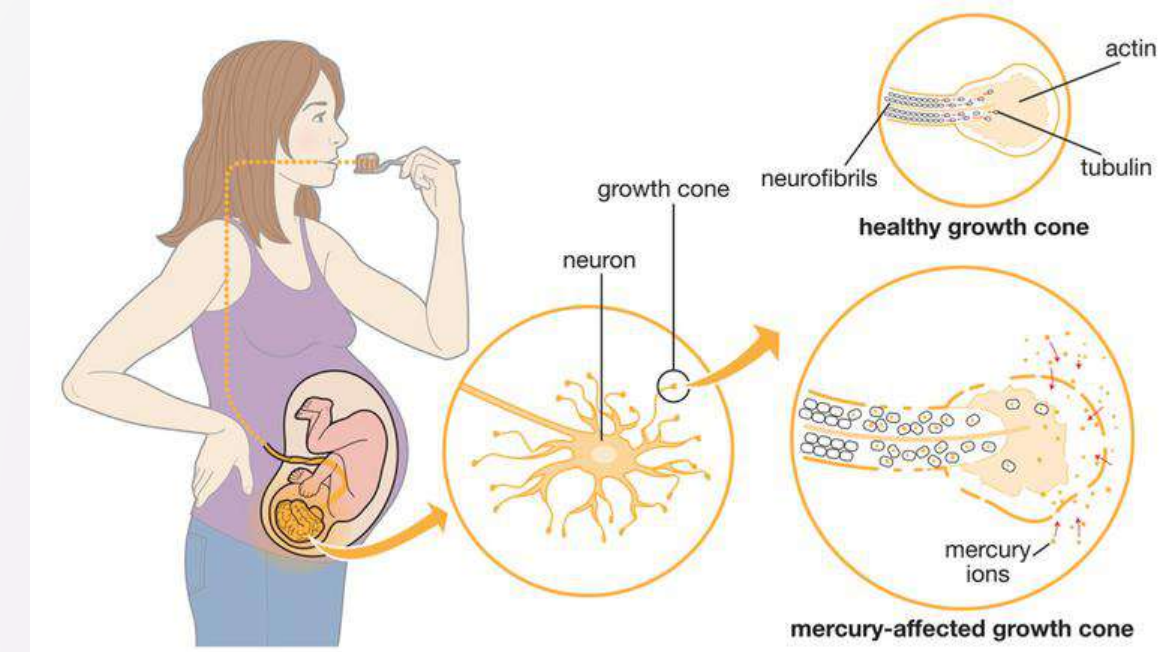
Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury,
Mercury Compounds and Mercury-added Skin Lightening Products



LINE-UP

- Research data supporting the impact of mercury
- Industry of cosmetics in Sri Lanka
- Awareness efforts
- Regulatory framework
- Missing links

Research data supporting the impact of mercury



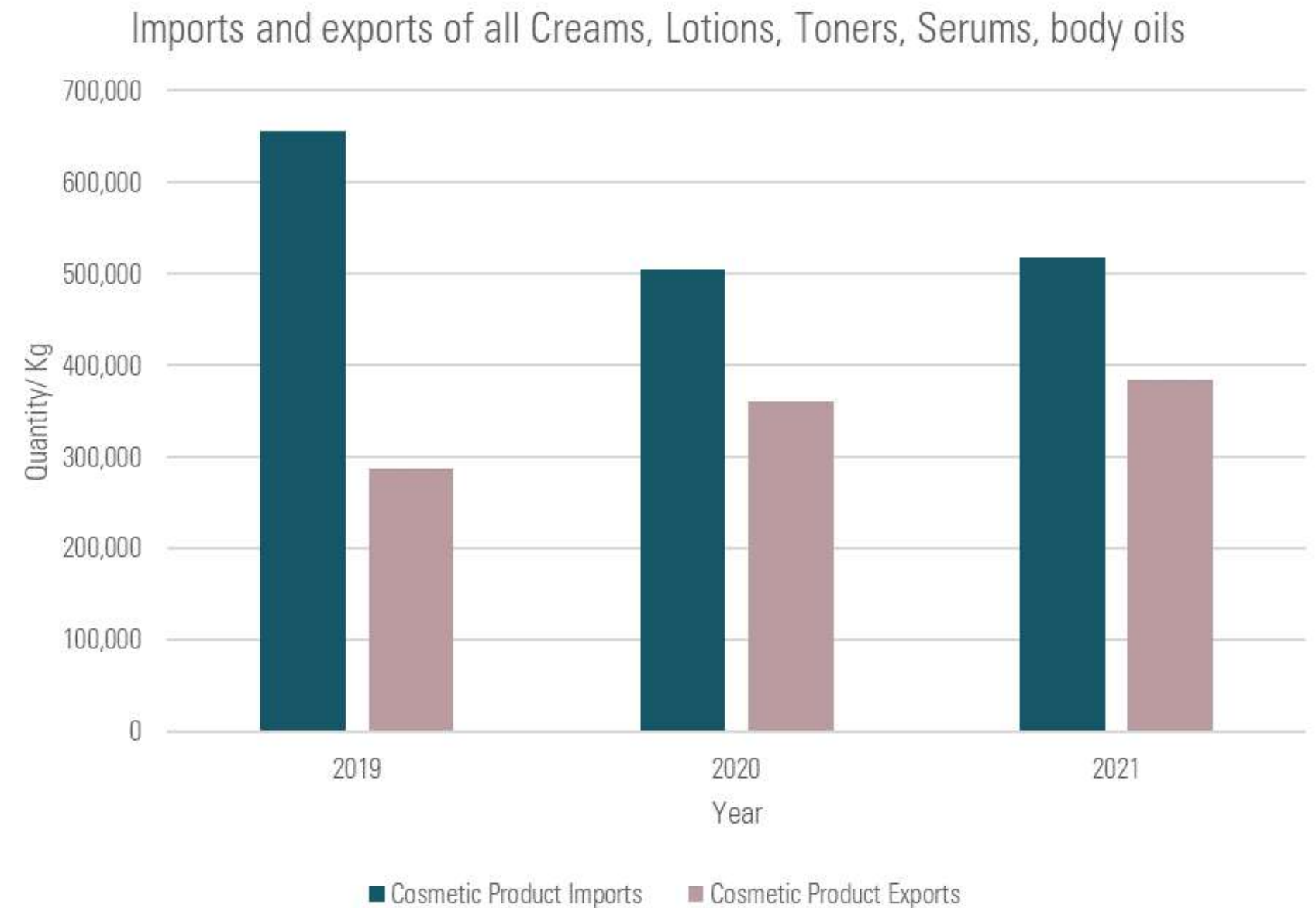
Mercury in creams is Absorbed through skin and It can transfer from Mother to the baby

Image curtesy:

<https://www.momscleanairforce.org/resources/how-mercury-poisoning-works/>

Industry of cosmetics in Sri Lanka

- The cosmetic industry in Sri Lanka include skin care, hair care, oral care, baby care, colour cosmetics, perfumes & colognes, and hygiene products.
- It is estimated that about 65% of cosmetics are produced locally and the balance 35% are imported.
- By end of 2022, cosmetics market in Sri Lanka was estimated to be about Rs. 90 billion.
- There are over 30 companies manufacturing cosmetics in Sri Lanka.
- However cottage production and mixtures by individuals are not counted.



Industry data book –
2022

[BACK TO AGENDA PAGE](#)



8 Sept · 🌐

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13 reactions · 7 comments

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Whitening Cosmetic manufacturing

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Whitening Face cream
Whitening Body lotion
Whitening Creamy soap

Whitening Glycerin soap
Whitening Serum
Pink Lip balm

Whitening Face pack
Whitening Face and body scrub

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1 reaction

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9:53 AM

9:53 AM

Like Comment Send Share

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Hk's Post

Cosmetic Items

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2y Like Reply Share

Cosmetic Items

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2y Like Reply Share

Cosmetic Items

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Disclaimer: None of these products or platforms displayed here are promoted or demoted. They are displayed solely for awareness purposes.

Awareness efforts

Image courtesy:
posts developed by Sri Lanka
College of Dermatologists
<https://slcd.lk/assets/img/member-info/journals/volume-23/sljod-v23-p2-5.pdf>
<https://www.facebook.com/srilankacollegeofdermatologyandaestheticmedicine/post/s/pfbid02oPk9CGanyOPf4X95pEGAjyLb9sX5XZhnS3MAZN3SttVqux19h3w1GRwePP9m334Jl>

Consumer Affairs Authority' list of
hazardous skin cream products
containing mercury:

[Hazardous Products](#)

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- අධික කරුණු
- සම තුනී වීම
- අඳිමි ලකුණු (Stretch Marks)
- අනවශ්‍ය රෝම වර්ධනය

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සමේ පිළිකා

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பாவனையாளர் அலுவலகம் அறிக்கை
CONSUMER AFFAIRS AUTHORITY

CAA/CP/01/Pub.Notice/01/2025

12/05/2025

Hazardous Skin Products Containing Mercury

S/N	Name of the Product	Batch no	Hg content detected/ ppm
1	Arena Gold	No batch number on label.	30080
2	Athisayam	No batch number on label.	Peroxide Value and Mesophilic Bacteria do not comply with the Specifications of Sri Lanka Standards for Skin Creams & Lotions. (SLS 743)
3	B Black Magic Beauty Cream	0712B235	14520
4	Beauty Booster Beauty Cream	No batch number on label.	32980
5	Beauty Care Day Cream	No batch number on label.	5.1
6	Carotene Natural Glow Clarifying	1053387	312
7	Every Way Beauty Cream	No batch number on label.	37250
8	Fiona Anti Aging	No batch number on label.	4265
9	Fresh & Clear	786010	31540
10	Fresh & White	No batch number on label.	8.1
11	Fresh & White	No batch number on label.	28340
12	Fresh & White Body Butter	No batch number on label.	1.7
13	Fresh White	No batch number on label.	17632
14	Glow	No batch number on label.	7845

Chairman, Consumer Affairs Authority

Gluta White Cream	No batch number on label.	190
Golden Life Beauty Cream	B#50348-59	42980
Golden Life Cream	No batch number on label.	5723
Golden Pearl	No batch number on label.	13271
Goree	No batch number on label.	10644
Goree Beauty Cream With Lycopene, Avocado And Aloevera	G8121	9436
Goree Day And Night Cream	No batch number on label.	9109
Jhalak Beauty Cream	No batch number on label.	36920
Kashee Organic Beauty Cream	B#1041	64570
Layla Ayurvedic Anti-Acne Cream	No batch number on label.	94.6
Lo'Agus Armanee Lacto Bleach Whitening Cream	1014	1980
Love In Ayurvedic Cream	No batch number on label.	9405
Ma'daam Gold Beauty Cream	B-JL-1762	62440
		Lead 75
Magic Fairness	No batch number on label.	6711
Malika	92786	51752
Muna	No batch number on label.	13774
Navia	Batch no not clear	10959
Navia	No batch number on label.	2.8
Navia Beauty Cream	No batch number on label.	27935
NAVIA Whitening Cream For Men	No batch number on label.	45380
Noor Herbal Beauty Cream	B#51001-06	58490
		Lead 19.1
Noor Gold	41716-18	8786

37	Pax Complexion Care Beauty Cream	EXS518.0909	55700
38	Pax Complexion Care Beauty Cream	518.0917	10582
39	Super Super White	No batch number on label.	6905
40	Super White Beauty Cream	No batch number on label.	49160
			2670
41	Ujooba	DC-1811	17195
42	Ujooba	A&R 1413	10182
43	Ujooba Gold Advanced Beauty Cream	BFB-1837	21590
44	White Face Cream	TM No 268745	9730
45	White Face Beauty Cream	No batch number on label.	38770
			Lead 23.4
46	White Secret Lightning Body Cream	No batch number on label.	234
47	White Secret Lightning Lotion	No batch number on label.	142
48	Whitening Body Butter	No batch number on label.	7540
			Lead 19.1
49	Zuni Beautiful Beauty Cream	2WO4B2Q	66680

Permissible maximum limits for heavy metals when tested in accordance with ISO/TR 17276 as specified in SLS 743 issued by the Sri Lanka Standards Institution.

- Lead (as Pb) 10 mg/kg
- Arsenic (as As) 3 mg/kg
- Mercury (as Hg) 1 mg/kg
- Cadmium (as Cd) 3 mg/kg

Gazette Extraordinary

No. 2312/78

Dated January 01, 2022

GOVERNMENT NOTIFICATION

Imports and Exports Control Act, No. 1 of 1969

IN terms of the powers vested in me by Section 20 read together with Sub-Section 4(1), Section 6 and Section 14 of the Imports and Exports (Control) Act, No. 1 of 1969 as amended by Act, No. 48 of 1985 and Act, No. 28 of 1987, I, Ranil Wickremesinghe, the Minister of Finance, Economic Stabilization and National Policies promulgate following Regulations.


Ranil Wickremesinghe,
Minister of Finance, Economic
Stabilization and National Policies

Ministry of Finance, Economic Stabilization and National Policies,
Colombo 01,
January 01, 2023.

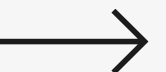
REGULATIONS

1. These Regulations may be cited as the “**Imports and Exports (Control) Regulations No. 02 of 2023**”.
2. The Imports and Exports (Control) Regulations No. 10 of 2021 published in the Gazette Extraordinary No. 2231/18 dated June 11, 2021 including its Schedules, as amended subsequently and the Imports and Exports (Control) Regulations No. 13 of 2022 published in the Gazette Extraordinary No. 2294/30 dated August 23, 2022, including its Schedules, as amended subsequently, are hereby repealed without prejudice to the importation of goods.
3. These regulations shall enter in to force with effect from January 01, 2023.
4. Importation of any goods, specified in the **Schedule I** to these Regulations, shall be temporarily suspended effective from January 01, 2023, until further notice.

Imported products

- NMRA registration
- NMRA Import License
- Compliance with SLS 743: Specifications for Creams and Lotions, under the Gazette Extraordinary 2384/85, 17 May 2024

[BACK TO AGENDA PAGE](#)



Locally available products

- NMRA registration (Mandatory)
- NMRA Import License (Voluntary)
- Manufacturing site registration at NMRA (Voluntary)
- SLS 743:2021, SPECIFICATION FOR SKIN CREAMS AND LOTIONS, maximum Hg 1 ppm (Voluntary)
- Standard Operational Procedure for Ayurvedic products
- CAA regulations on online platforms, Gazette Extraordinary 2332/15, 17 May 2023
- CAA gazette extraordinary No. 2069/37 – THURSDAY, MAY 03, 2018, maximum Hg 1 ppm

EXTRAORDINARY	
අංක 2069/37 - 2018 මැයි මස 03 වැනි බ්‍රහස්පතින්දා - 2018.05.03	
No. 2069/37 - THURSDAY, MAY 03 2018	
(Published by Authority)	
PART I : SECTION (I) — GENERAL	
Government Notifications	
Direction No. 65	
CONSUMER AFFAIRS AUTHORITY ACT, No. 09 OF 2003	
Direction under Section 12(2)	
ACTING under the powers vested in it by Section 12(2) of the Consumer Affairs Authority Act, No. 09 of 2003, the Consumer Affairs Authority directs that no Manufacturer, Importer, Packer, Distributor or Trader shall manufacture, import, distribute, pack, store or sell or display for sale, expose for sale, or offer for sale, wholesale or retail any skin creams and lotions unless such skin creams and lotions shall conform to the permissible maximum limits for heavy metals when tested in accordance with ISO/TR 17276 as specified in SLS 743 issued by the Sri Lanka Standard Institution.	
Heavy Metal	Permissible Maximum Limit
Lead (as Pb)	10 mg/kg
Arsenic (as As)	3 mg/kg
Mercury (as Hg)	1 mg/kg
Cadmium (as Cd)	3 mg/kg
Skin Creams and Lotions include :	
(1) makeup creams and lotions	
(2) cleansing creams and lotions	

there is a drawback in this legislation;

1. Court orders in cases filed by the CAA for violating these standards are only valid within the jurisdiction of the issuing court, meaning the same harmful product could still be sold in other parts of the country.

21 Oct · 🌐

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Whitening cosmetic manufacturing cour... See more

ප්‍රතිඵල සහිත නිෂ්පාදන
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බිත්තෝබර්
27 නුගේගොඩදි

**වයිටිනිං රූපලාවණ්‍ය
නිෂ්පාදන පාඨමාලාව**
Whitening Cosmetic manufacturing



Whitening Face cream	Whitening Glycerin soap	Whitening Face pack
Whitening Body lotion	Whitening Serum	Whitening Face and body scrub
Whitening Creamy soap	Pink Lip balm	

Whitening Face gel
කොමිලේ ඉදගන ගන්නත් පුළුවන්

වේටිගෝ ලක්ෂ ගණන් ආයුර්වේද
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✔ Online ඉගෙනගන්න පුළුවන්
✔ ඇවිත් ඉගෙනගන්න පුළුවන්

Unregulated areas

- Cottage production
- Adulterated products
- Mixtures produced by beauticians and saloon
- Courses promoting SLP manufacturing
- Importations, hand carried products for “personal use”
- E-markets– local and international (Ongoing)

← N shopping 🛒 📞 ☰

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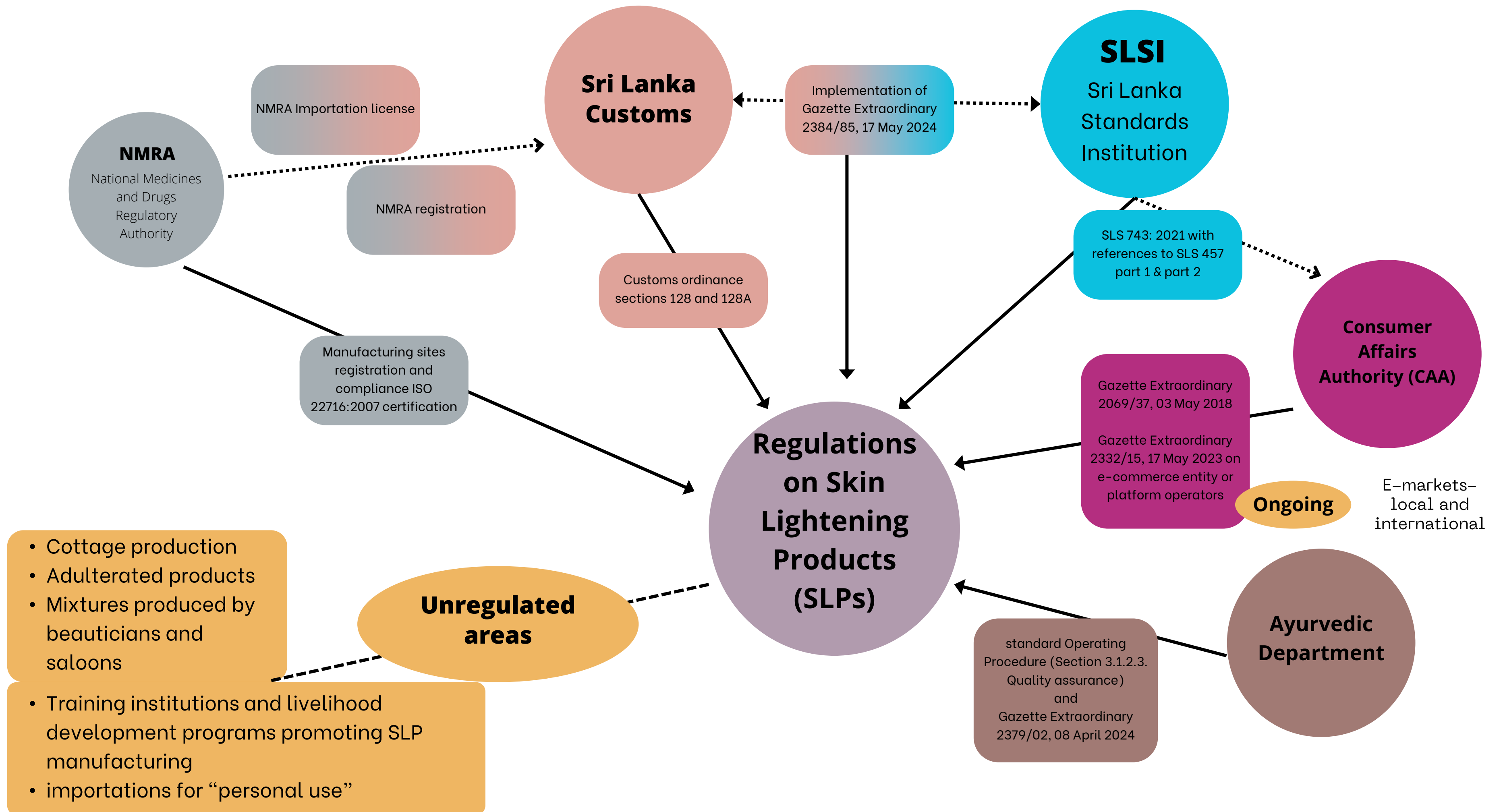
9:53 AM



9:53 AM

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💬 Chat on WhatsApp





Compilation of Relevant
Regulations

MISSING LINKS

**Research based
decision-making**

**Referencing system to
acknowledge products
breaching standards**

**Ensuring export
product quality to
ensure imports**

**Inadequate resource
mobilization**

A wide-angle photograph of a tropical beach. In the foreground, the golden sand meets the turquoise water with gentle waves. To the left, a white lighthouse stands on a small patch of land. Further out, a shipwreck is visible in the shallow water. The sky is a deep blue with scattered white clouds. A semi-transparent rectangular box is centered over the image, containing the text "THANK YOU" in a large, black, sans-serif font.

THANK YOU



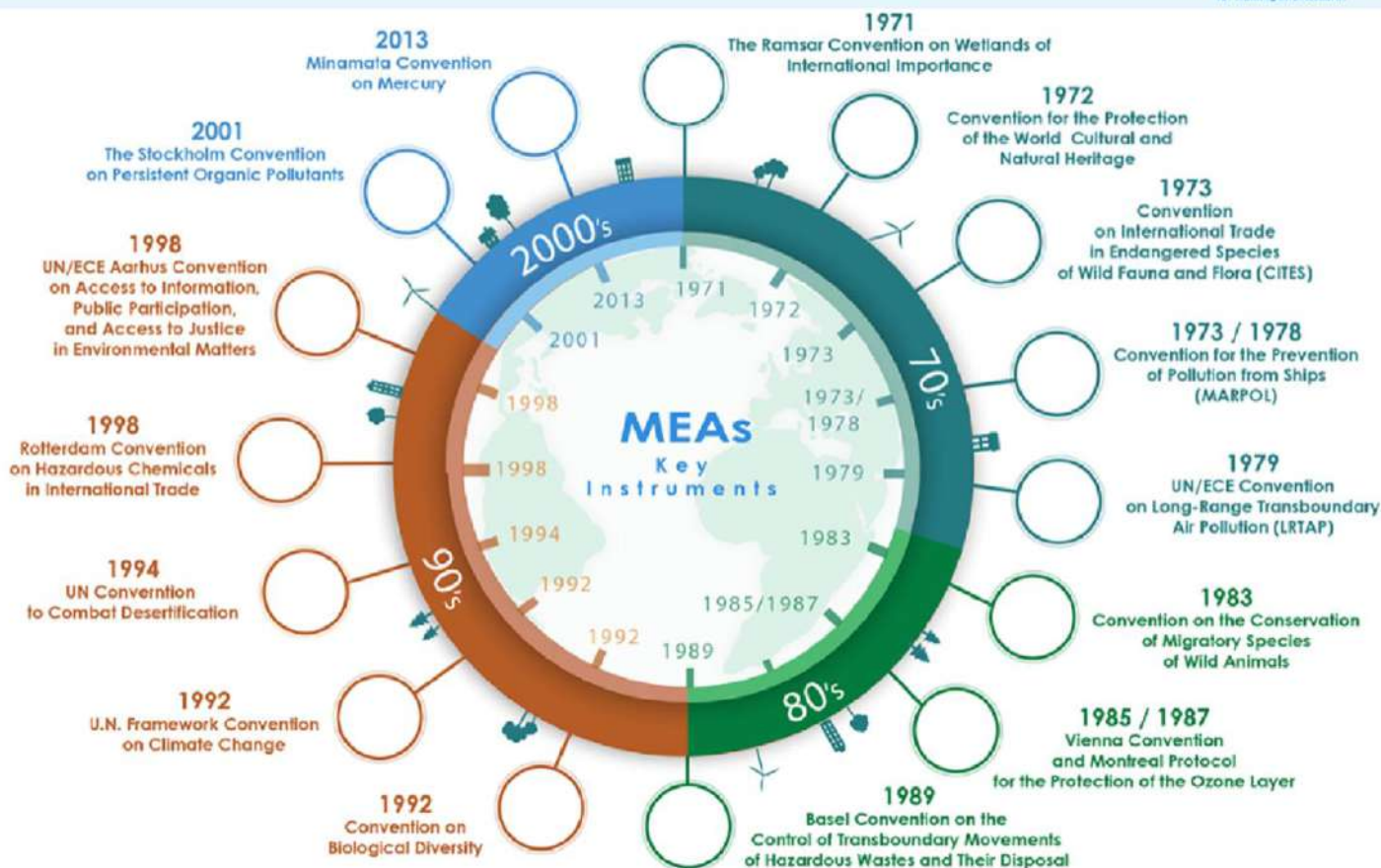
**World Customs
Organization**

Key operational best practices for Customs administrations and the available resources for enhancing implementation of the Minamata Convention on Mercury/other environmental agreements

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products

**Colombo, Sri Lanka
3-4 June 2025**

Multilateral Environmental Agreements (MEAs)



<https://www.informea.org/en>

Multilateral Environmental Agreements (MEAs)



Common types of trade-related measures used in MEAs include:

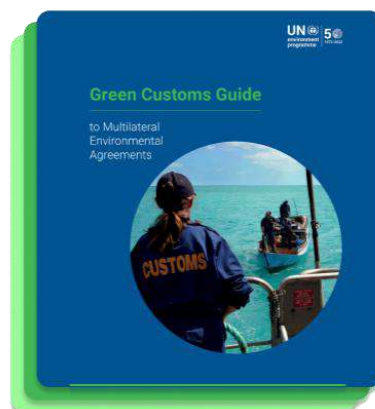
- Trade Restrictions or Bans
- Prior Informed Consent (PIC)
- Labelling and Packaging Requirements
- Phase-out or Phase-down Schedules
- Permitting and Licensing Systems
- Environmental Impact Assessments (EIA)
- Monitoring and Reporting Obligations
- Financial Mechanisms.

Green Customs Initiative



- UNEP (acts as GCI secretariat)
- UNEP OzonAction
- Basel Convention
- Rotterdam Convention
- Stockholm Convention
- Minamata Convention
- Cartagena Protocol to CBD
- CITES
- Montreal Protocol to the Vienna Convention
- UN Office of Drugs and Crime
- World Customs Organization
- Organization for the Prohibition of Chemical Weapons
- Interpol

Green Customs
Guide to
Multilateral
Environmental
Agreements



[INFORMATION NOTE ON FREE
TRADE ZONES, TRANS-
SHIPMENT AND MULTILATERAL
ENVIRONMENTAL
AGREEMENTS](#)

<https://www.greencustoms.org/>

WCO CLiKC! Modules

E-learning courses:

- Basel, Rotterdam and Stockholm Conventions
- CITES
- The Cartagena Protocol on Biosafety
- The Chemical Weapons Convention
- The Montreal Protocol
- Multilateral Environmental Agreements (*upcoming update*)
- Upcoming modules on e-waste and plastic waste, Module on the Minamata Convention.



Minamata Convention Article 3: Trade



- FORM A: Form for the provision of written consent by a Party to the import of mercury.
- FORM B: Form for the provision of written consent by a non-Party to the import of mercury.
- FORM C: Form for non-Party certification of the source of mercury to be exported to a Party.
- FORM D: Form for general notification of consent to Import Mercury.

Resources:

- [Forms related to Article 3 on Mercury trade.](#)
- [Guidance on completing the forms required under article 3 related to trade in mercury.](#)

Minamata Convention Article 4: Mercury-Added Products



- Certain mercury-added products must not be manufactured, imported, or exported after a certain phase-out date (Annex A).
- There are certain exemptions.
- For some products not subject to phase-out, parties must take steps to reduce mercury use. (Annex B).

Resources:

- *STRiKE report “[Onsite detection of mercury](#)”*

Article 10: Interim storage

- Article 10 on interim storage of mercury (not waste) states that mercury and its compounds should be stored in an environmentally sound manner, to avoid releases.

Resources:

- [Minamata Convention guidance](#).

Article 11: Waste



- Article 11 regulates mercury waste, and references the Basel Convention on the transboundary movement of hazardous waste and their Disposal (Also for countries that are not Basel Parties but are Minamata Parties).
- In the Minamata Convention mercury wastes mean substances or objects:
 - a) Consisting of mercury or mercury compounds;
 - b) Containing mercury or mercury compounds; or
 - c) Contaminated with mercury or mercury compounds.

Resources:

- https://minamataconvention.org/sites/default/files/documents/formsand_guidance_document/Mercury_Waste_Thresholds.pdf
- [Basel Convention guideline on mercury waste treatment](#)

Other international regulation related to mercury trade and shipments



Rotterdam Convention

- The following mercury compounds are covered by the PIC procedure (in Annex III to the Convention): “Mercury compounds, including inorganic mercury compounds, alkyl mercury compounds and alkyloxyalkyl and aryl mercury compounds.”
- These compounds are listed under the category “Pesticides”, but they actually have a broader application.

Resources:

- *Annex III*
<http://www.pic.int/TheConvention/Overview/TextoftheConvention/tabid/1048/language/en-US/Default.aspx>

Identification



- HS codes that are specific to materials, products and wastes with mercury. For example:
 - HS 280540 – Mercury
 - HS 285200 – Compounds, inorganic/organic, of mercury, excluding amalgam
 - HS 853931 – Lamps; discharge, (..), fluorescent, hot cathode
- In addition, there are other HS codes that are also relevant to mercury, meaning that the codes include materials, products and wastes with mercury, along with other non-mercury commodities and wastes.
- There are also regional or national codes beyond 6 digits.

Resources:

- The [Minamata Convention recommendations](#) for voluntary HS codes development for mercury-added products listed in Annex A to the Convention as of 2020.

Operational best practices



Document Verification & Controls

- Scrutinize consent documentation and permits, if applicable.
- Watch for red flags such as misdeclaration
- Enforce applicable domestic legislation on phased-out/phased-out products
- Maintain databases of contraventions to feed the risk analysis process
- Implement enforcement operations.
- Consider post-clearance audits.

Risk Management & Targeting

- Use risk indicators for mercury and mercury-added products.
- Incorporate relevant HS codes and known high-risk origins/routes/concealment methods, etc.
- Cooperate with the relevant stakeholders to inform the risk management process.

Operational best practices



Effective Inter-Agency Coordination

- Establish MoU and/or Standard Operating Procedures (SOPs) with environmental, health, and licensing authorities.
- Designate focal points and create rapid alert systems for suspicious shipments.
- Carry out joint inspections with environmental authorities.

Training & Awareness

- Train frontline officers on mercury/mercury-added products and environmental controls.
- Develop and disseminate domestic training materials.

THANK YOU!

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**Discussion Questions
for Sub-regional Customs Training to
Enhance Monitoring of Trade
of Mercury, Mercury Compounds and
Mercury-added Skin Lightening Products**

National Situation of Trade of mercury, mercury compounds and mercury-added products



-
- Which mercury-added products that are imported into your country and how can they be ranked in quantity?
 - Pesticides
 - Laboratory Chemicals
 - Dental amalgam
 - CFL/FLF
 - Cosmetics
 - Switchers/Relays
 - Measuring equipment
 - Ayurvedic medicines
 - Batteries
 - Paints

- Which mercury-related commodity poses the biggest risks or concerns for Customs to take action?

National Coordination

- Does your country have regular coordination meetings with other authorities/agencies/regulatory bodies to discuss mercury trade?
- Do you involve other agencies (e.g., law enforcement agencies)?

Mercury in SLPs context

"Following the latest decisions for the amendments to the Minamata Convention, the permissible limit of 1ppm Hg concentration in SLPs has been removed"

- What type of analytical equipment has been used for SLP analysis in your country and how do you envision building national capacity for your country?
 - If no, what is current laboratory capacity for analyzing mercury and do you see any benefit in taking a regional/sub-regional approach to monitoring SLPs?

Thank you! Questions?



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For more information on the project, visit:
<https://www.unep.org/mercuryfreecosmetics>

[#mercuryfreecosmetics](https://twitter.com/mercuryfreecosmetics)

Mercury trade information and reported case of illegal trade of mercury

- Please provide mercury import/export information including illegal mercury flow
- Please also provide evidence of illegal trade of mercury (place, weight, year) if any. (e.g., year, weight, place, summary of data).
- Please provide Customs existing procedures for sound handling of seized commodities including mercury, mercury added products and mercury waste.

Mercury in SLPs context

Is the data publicly available and is there interest in contributing to the development of a global database?

Have there been any restrictions or pushback on discussion or reporting on mercury concentrations in SLPs?

What is your current laboratory capacity for analyzing mercury and how do you envision this project building national capacity for your country?

If no, what is current laboratory capacity for analyzing mercury and do you see any benefit in taking a regional/sub-regional approach to monitoring SLPs?

Challenges

- Which mercury-related commodity poses the biggest risks or concerns for Customs to take action?

- Please provide plans and information on modifying or adding 8-and 10-digit HS codes for the purposes of obtaining better information on mercury-added products if any (e.g., Product name, timeline, status, etc.)
- If possible, please also share any data and information generated by the 8-and 10-digit HS codes to identify mercury added products at the national level.



**More than 6-digit HS
codes for mercury
added products**



**World Customs
Organization**

Risk Assessment Methodologies – Detecting and Profiling High Risk Mercury Shipments

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products

**Colombo, Sri Lanka
3-4 June 2025**

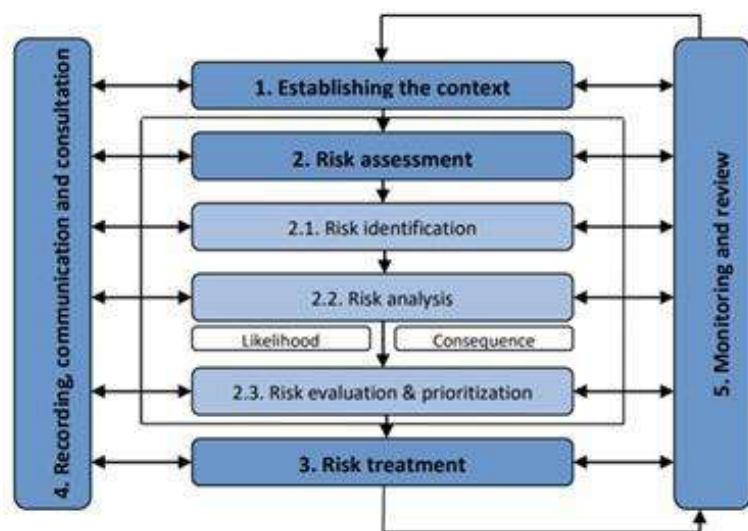
Risk management approach to environmentally sensitive commodities



- Effective Customs risk management across the international supply chain is essential for supporting Customs enforcement of fiscal and non-fiscal tasks (including safeguarding human health and safety, protecting the environment and biodiversity), and facilitating legitimate trade.
- The risk management process involves identifying, assessing, and addressing risks in international trade through a structured approach.
- It enables Customs to target high-risk consignments while facilitating the movement of low-risk ones.
- Strategies should encompass prevention, detection, and response measures.

Risk management approach to environmentally sensitive commodities

- The risk management process begins with gathering and analyzing data to identify potential threats. This is followed by the development of risk profiles and mitigation measures, documentation of actions taken and their outcomes, effective communication and consultation, and ongoing monitoring and review—all of which feed back into and refine the risk assessment process.



[WCO Customs Risk Management Compendium](#)

Risk management approach to environmentally sensitive commodities



- Various data elements available to Customs can offer valuable insights into potential irregularities and illegal trade activities. These elements serve as risk indicators, which can be utilized to develop risk profiles for targeting goods.
- While the methodology for creating risk profiles for environmentally sensitive commodities aligns with those used in other areas of Customs work, the weight and relevance of specific elements in targeting are determined by factors unique to each environmentally sensitive commodity.
- Collaboration between Customs and environmental authorities is essential to consistently collect and share data, address information gaps, and complement each other's efforts.

THANK YOU!

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**World Customs
Organization**

Planning a Joint Operation with Customs, Ministry of Environment and Other Agencies

**Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury
Compounds and Mercury-added Skin Lightening Products**

**Colombo, Sri Lanka
3-4 June 2025**

Customs enforcement operations



- Customs operations serve as a practical testing ground for the results of targeted enforcement efforts.
- Their outcomes provide a basis for strengthening the effectiveness of Customs enforcement, particularly in the context of joint enforcement actions.
- These operations typically involve risk analysis, targeting, detention and control of suspicious consignments and traders, data and intelligence sharing, inter-agency collaboration, and bilateral or multilateral Customs cooperation.

Guidelines on the Implementation of WCO Operations at National Level



GUIDELINES ON THE IMPLEMENTATION OF WCO OPERATIONS AT NATIONAL LEVEL

- To support Customs in implementing WCO enforcement operations.
- To provide an overview of basic steps that can support the implementation of WCO operations at national level.
- To improve cooperation methods and developing good administrative practices with other law enforcement authorities.

Guidelines on the Implementation of WCO Operations at National Level



Guidelines on the Implementation of WCO Operations at National Level

EXECUTIVE SUMMARY

Customs play a vital role in the fight against transboundary crime. It is therefore crucial for the World Customs Organization (WCO) to promote and develop operational cooperation between Customs administrations, the WCO and other relevant international organizations. To this end the WCO has, for many years, successfully carried out global, regional and project-oriented operations to combat Customs offences and contribute to the fight against illegal activities affecting the collection of duties, and the security of people and the environment.

[guidelines-on-the-implementation-of-wco-operations-at-national-level_en.pdf \(wcoomd.org\)](https://www.wcoomd.org/publications/guidelines-on-the-implementation-of-wco-operations-at-national-level_en.pdf) (available at WCO Members website and operation DEMETER X Closed User Group)

THANK YOU!

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**World Customs
Organization**

Development of regional enforcement strategies and collaboration roadmaps

**Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury
Compounds and Mercury-added Skin Lightening Products**

**Colombo, Sri Lanka
3-4 June 2025**

WCO Asia-Pacific Plastic Waste Project

(implemented between 2020-2023, funded by the Government of Japan)



Regional Action Plan (RAP)

Topics

Establish sufficient mandate and legal basis for Customs Administrations to assume their responsibility in the plastic waste trade;

Design a joint and uniform response to illegal trade in plastic waste to avoid port hopping and evasive behaviour;

Reduce the administrative burden and clearance time and facilitate legal trade in plastic waste and scrap;

Strengthen Customs-to-Customs and Customs-to-Other Government Agencies cooperation and communication;

Awareness raising and Capacity Building support on the provisions and regulations related to plastic waste trade.

RAP includes: proposed actions, stakeholders, timeframes

Development of regional enforcement strategies/ collaboration roadmaps/ action plans may require:



- Identification of the main challenges and areas for improvement identified in the region.
- Better understanding of the Minamata Convention requirements for mercury and mercury-added products.
- Facilitation of the exchange of intelligence and information on restrictions and prohibitions in the region.
- Discussion on regional risk management approaches.
- Joint and targeted trainings on mercury/mercury-added products.
- Improved cooperation and collaboration between Customs Administrations and other relevant stakeholders.

THANK YOU!

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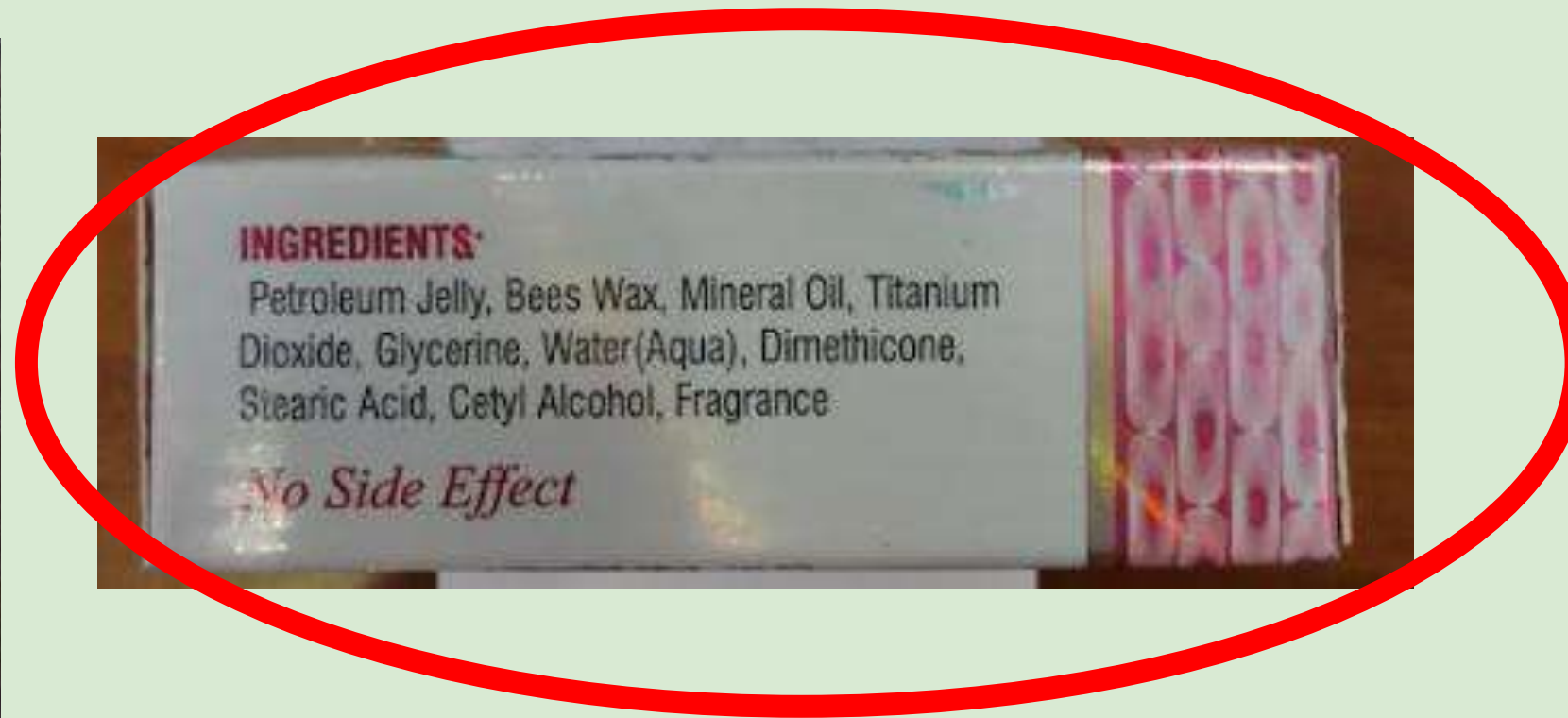
BRI GLOBAL DATABASE DEVELOPMENT FOR MERCURY SKIN LIGHTENING PRODUCTS

Multi-country Meeting on Eliminating Mercury-
added Skin Lightening Products
Colombo, Sri Lanka
4 June 2025

Introduction

Why a Centralized Database is Important for Mercury Monitoring in Cosmetics

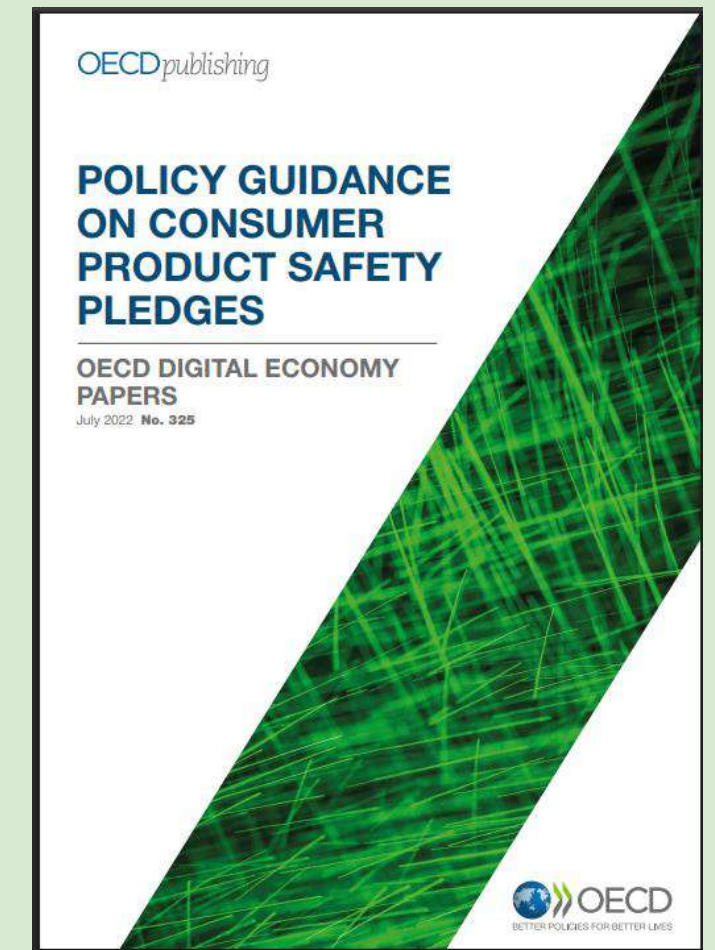
- **Lack of Ingredient Transparency:** Mercury is often not listed on product labels or have ingredients written in different languages, making it difficult for consumers, regulators, and health authorities to identify hazardous products based on packaging alone.



- **Limited Testing Capacity at Borders:** Many customs agencies lack the equipment, expertise, or resources to routinely test cosmetic products for mercury, allowing dangerous items to enter markets undetected.

Reference Tools

- Other organizations have contributed to assisting this issue by developing reference tools to help consumers, customs agencies and other stakeholders identify these products:
 - Zero Mercury Working Group (ZMWG): Enforcement measures to restrict high mercury cosmetic products under the Minamata Convention
 - Organisation for Economic Co-operation and Development (OECD): POLICY GUIDANCE ON CONSUMER PRODUCT SAFETY PLEDGES
 - The European Union's Rapid Alert System for dangerous non-food products (RAPEX)
- Although these tools have been developed under the European context, they can be used as reference materials in Asian specific contexts





Monitoring Mercury Skin Lightening Products and Data Dissemination

- **Development of a Database**



Creating a centralized global database for skin lightening products will aim to:



- **Support Regulatory Enforcement and Monitoring:** A centralized database allows regulatory bodies to track known mercury-containing products, prioritize inspections, and take enforcement action more effectively.
- **Improve Global Information Sharing:** Countries can share findings, lab results, and product data, enhancing global efforts to detect and restrict harmful products and reducing duplication of work.

Creating a centralized global database for skin lightening products will aim to:

- **Protect Public Health:** By identifying and flagging high-risk products, the database supports efforts to prevent mercury exposure, especially in vulnerable populations.
- **Support Consumer Awareness and Safer Choices:** Public access to the database can empower consumers to avoid harmful products and encourage manufacturers to comply with safety standards.



Under the GEF 10810 Hg SLP Project:

All SLP Hg concentrations will be kept in a **centralized database** developed in coordination with the UNEP Global Mercury Partnership and will be available to the Ministry of Health and/or other designated government ministry as well as Customs.



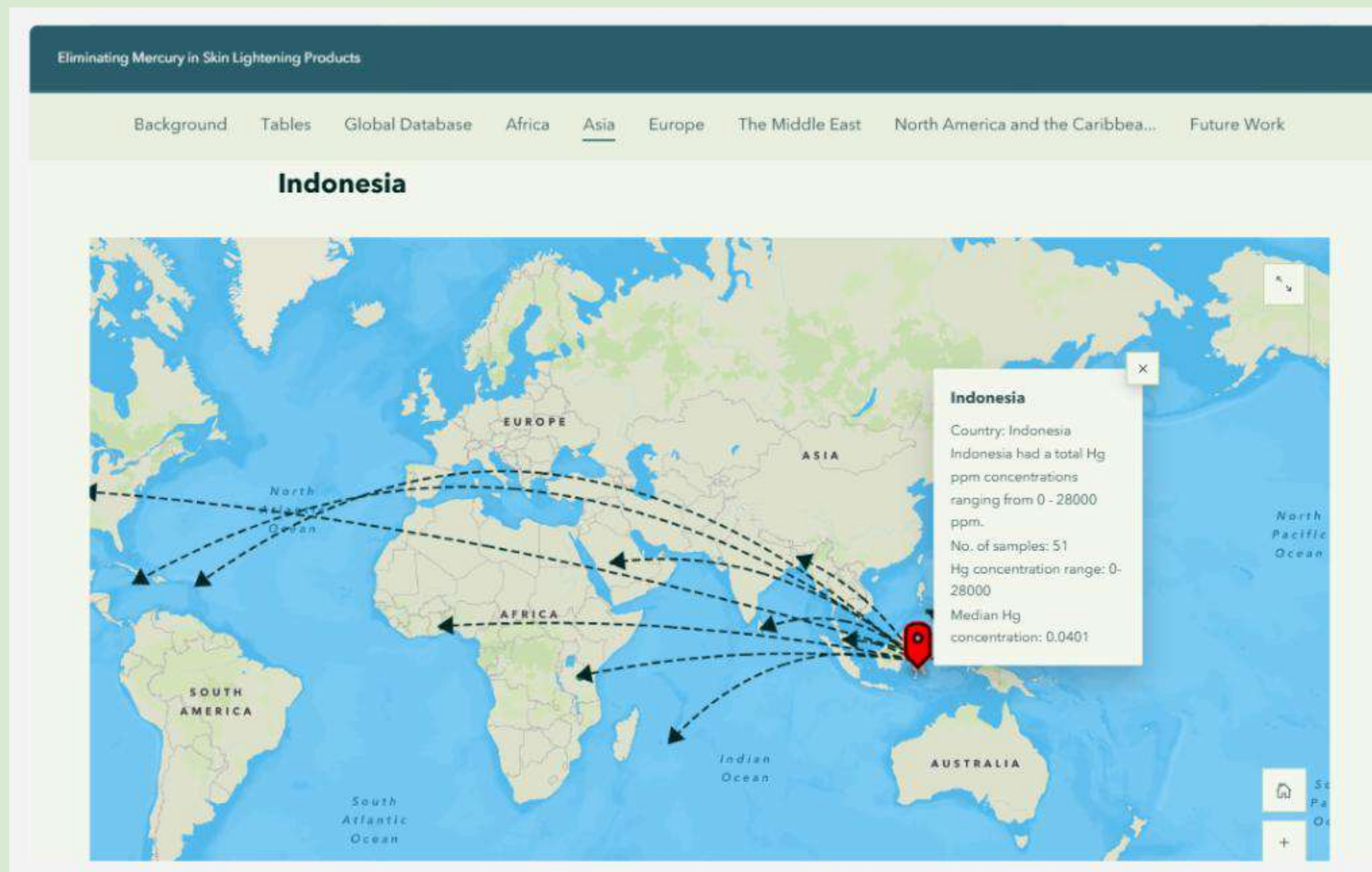
In addition to the sampling data collected under the project...

- BRI has gathered and is comparing existing validated data worldwide to develop a global database of SLPs
- Over **4,000 SLP sample results** obtained
- **Sources reviewed included:**
 - Over 50 Published Journal Articles
 - Datasets from Zero Mercury Working Group (ZMWG) who provided data on 1185 SLPs from their research
 - Databases/Reports released by recognized entities (NGOs and monitoring agencies)



Data generated is being used to identify...

- Potential key hubs for **production**
- **Patterns of distribution**
- **Products of interest** for testing in project countries/regions





Eliminating Mercury in Skin Lightening Products

[Background](#)[Tables](#)[Global Database](#)[Africa](#)[Asia](#)[Europe](#)[The Middle East](#)[North America and the Caribbea...](#)[Future Work](#)

Asia

China



Goals for Database

Within the scope of the project:

- **Incorporate results** from the project countries into the database and **enhance the interface** to improve usability
- To be **used as a reference** for the development of regulations to prevent import/export/manufacture of Hg SLPs (which will enable monitoring by Customs and other agencies)
- More specific data on Hg concentrations can be **made available for tracking of progress in phase out of SLP product** availability/Hg content in SLPs.

Outside the scope of the project:

- To be a **'living' database** with a mechanism for other **researchers/monitoring entities to access/contribute** to and be used as a reference tool for consumers after the project has been completed.
- Ongoing work will include **integration of new data sources, stakeholder engagement, and maintenance** to ensure the database remains accurate, comprehensive, and reflective of current developments in the field.

Thank you! Questions?



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For more information on the project, visit:
<https://www.unep.org/mercuryfreecosmetics>

[#mercuryfreecosmetics](https://twitter.com/mercuryfreecosmetics)

Experience sharing on handling mercury-added products

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products

**Wednesday 4 June 2025,
Colombo, Sri Lanka**

**Elena Lymberidi-Settimo, Senior Advisor/International Co-coordinator
European Environmental Bureau/ Zero Mercury Working Group
UNEP GMP Products Area co-lead**

**Tahlia Ali Shah, Ashley Bastiansz
International Environmental Specialists
Biodiversity Research Institute**



Picture credit, BRI 20

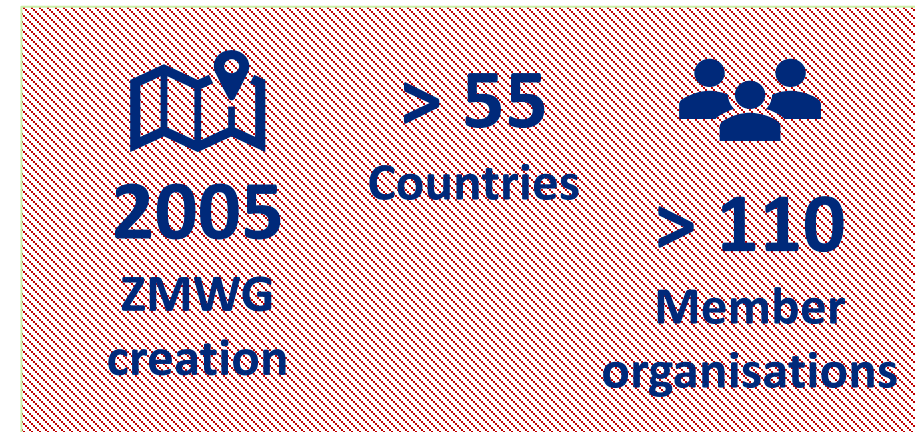
ZMWG and Hg/Skin Lightening Products Campaign Partners



- Europe's largest network > 190 NGOs > more than 40 European countries > 30 million members and supporters.
- Vision: A better future where people and nature thrive together



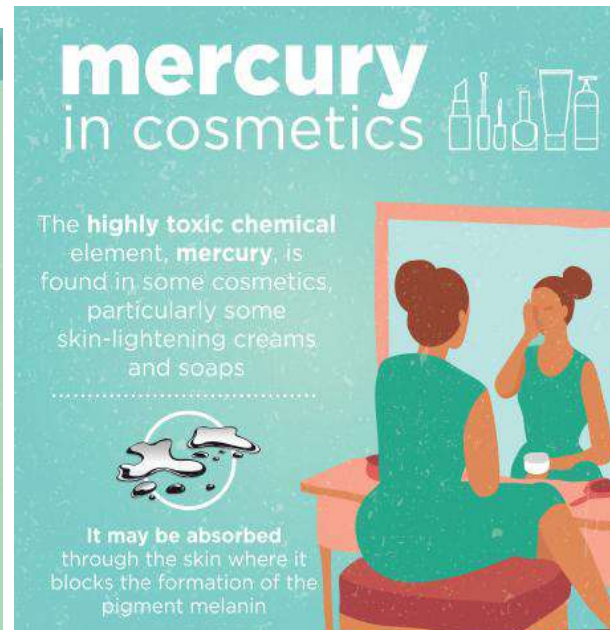
Aim: Reduce/eliminate mercury supply, use, emissions, exposure, and support implementing the Minamata Convention on Mercury



- **ASIA-** BAN Toxics, **the Philippines**; Center for Public Health and Environment, **Nepal**; Earth, **Thailand**; Environmental and Social Development Organization, **Bangladesh**; NEXUS3Foundation, **Indonesia**; Toxics Link, **India**

MERCURY ADDED CONSUMER PRODUCTS

- MAPs are approximately 30% of the global demand for mercury
 - Lighting devices (e.g.) CFLs, LFLs and High-pressure mercury vapour lamps
 - Batteries
 - Electrical Switches and Relays
 - Non-electrical measuring devices
 - Dental amalgam fillings
 - Pesticides, biocides and topical antiseptics
 - **Cosmetics such as mercury skin lightening products (SLPs).**



Evidence Gathered by the ZMWG Campaign



Global samplings 2017- 2018, 2019, 2022, 2023

- ❑ Main focus on online platforms' sales
- ❑ Over 1000 products tested, engaging multiple NGO partners from around the globe
- ❑ From over 40 platforms
- ❑ Over 70 brands found with mercury above 1ppm.

Mercury findings in skin-lightening products Online Database
Zero Mercury Working Group

Custom Search Builder

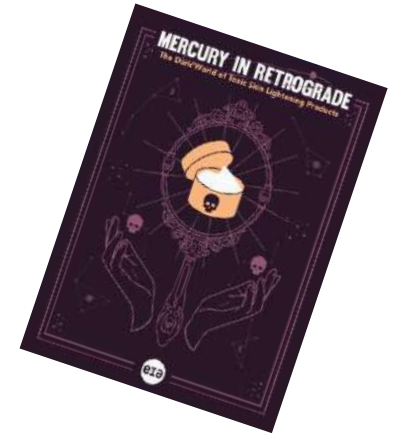
Columns: Year of Sampling, Brand, Product, Brand in Database, 1 ppm Threshold Exceeded, Manufacturing Country (Sampling), Monitoring Entity, Place of Purchase, Country of Purchase, Region of Purchase

Year of Sampling	Brand	Product	Brand in Database	1 ppm Threshold Exceeded	Manufacturing Country (Sampling)	Monitoring Entity	Place of Purchase	Country of Purchase	Region of Purchase
2021	Anika Gold	Fairness Cream	N/A	N/A	Thailand	EU Safety Gate	N/A	Netherlands	Europe
2022	Jakko	La'Vie Bathing Aromatique - JAKKO Sulfure (2022)	Yes	Yes	Yes	EU Safety Gate	N/A	Germany	Europe
2023	Diana	Anti Acne	N/A	Yes	Latvia	EU Safety Gate	N/A	France	Europe
2023	Silviana	Silk Sleep Cream	N/A	Yes	United States of America	EU Safety Gate	N/A	Germany	Europe
2023	Unknown (language issue)	Pink Cream - Yellow cream (p. 1)	N/A	Yes	N/A	EU Safety Gate	N/A	Germany	Europe
2023	Unknown (language issue)	Pink cream - White cream (p. 2)	N/A	Yes	N/A	EU Safety Gate	N/A	Germany	Europe

Showing 1 to 12 of 1,021 entries

ZMWG Database

<https://www.zeromerccury.org/projects/mercury-added-skin-lightening-creams-campaign-database/>



EIA investigation 2023

- ❖ Mercury compounds added in SLPs
- ❖ Production in Thailand, Jamaica, and Pakistan
- ❖ Intermediary transit ports in Spain, UAE, and USA.

Controlling online sales



- Ban sales and offering of sales
- Clear liability rules to be established and enforced, with significant penalties
- E-commerce platforms :
 - must ensure that the sellers comply with domestic health and safety law (correct labelling, disclosure of ingredients etc)
 - should verify foreign third-party sellers and appoint a home-country legal representative
 - made responsible for ensuring compliance with third party seller verification, and information/ingredient disclosure requirements
- Consumer safety regulatory approaches exist in countries around the world covering online services
- ***Case study: Amazon.com settles after not warning consumers on potential cancerogenic effects of SLPs (as they were found with mercury)***

Share your country experiences!

1. Which Mercury Added Products (MAPs) have you handled?
2. How were the products labelled (mercury mentioned, concentration/quantity, etc..)
3. How did you handle them when those came into the country(banned or not)? Do you have any Standard Operating Procedures/MAP handling?
4. What challenge did you face in handling these products? (e.g. lack of equipment XRF, need for prohibited product list, cooperation issues among agencies)
5. Are you aware whether the online sales of SLPs is regulated in your country? Would customs be involved in this?



THANK YOU



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ZMWG International Co-coordinator



UNEP GMP Products Area Co-lead

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Bureau



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BIODIVERSITY RESEARCH INSTITUTE
innovative wildlife science



Managing Mercury Trade, Storage and Disposal in ASGM

Krishna Zaki

General Manager, Nexus3 Foundation

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About Us



- BaliFokus established on 14 June 2000
- 2019 rebranding as Yayasan Fokus Nexus Tiga or Nexus for Health, Environment, and Development Foundation (Nexus3 Foundation)
- Working to safeguard the vulnerable population from the impact of development to their health and environment, in collaboration with all stakeholders towards a just, toxic-free and sustainable future
- www.nexus3foundation.org



Minamata Convention on Mercury



- <https://minamataconvention.org/>
- Adopted by 128 countries on 10 October 2013 in Kumamoto, Japan
- Entered into force on 16 August 2017
- As of June 2025: it has been ratified by 152 countries, including Indonesia
- Indonesia ratified on 19 September 2017



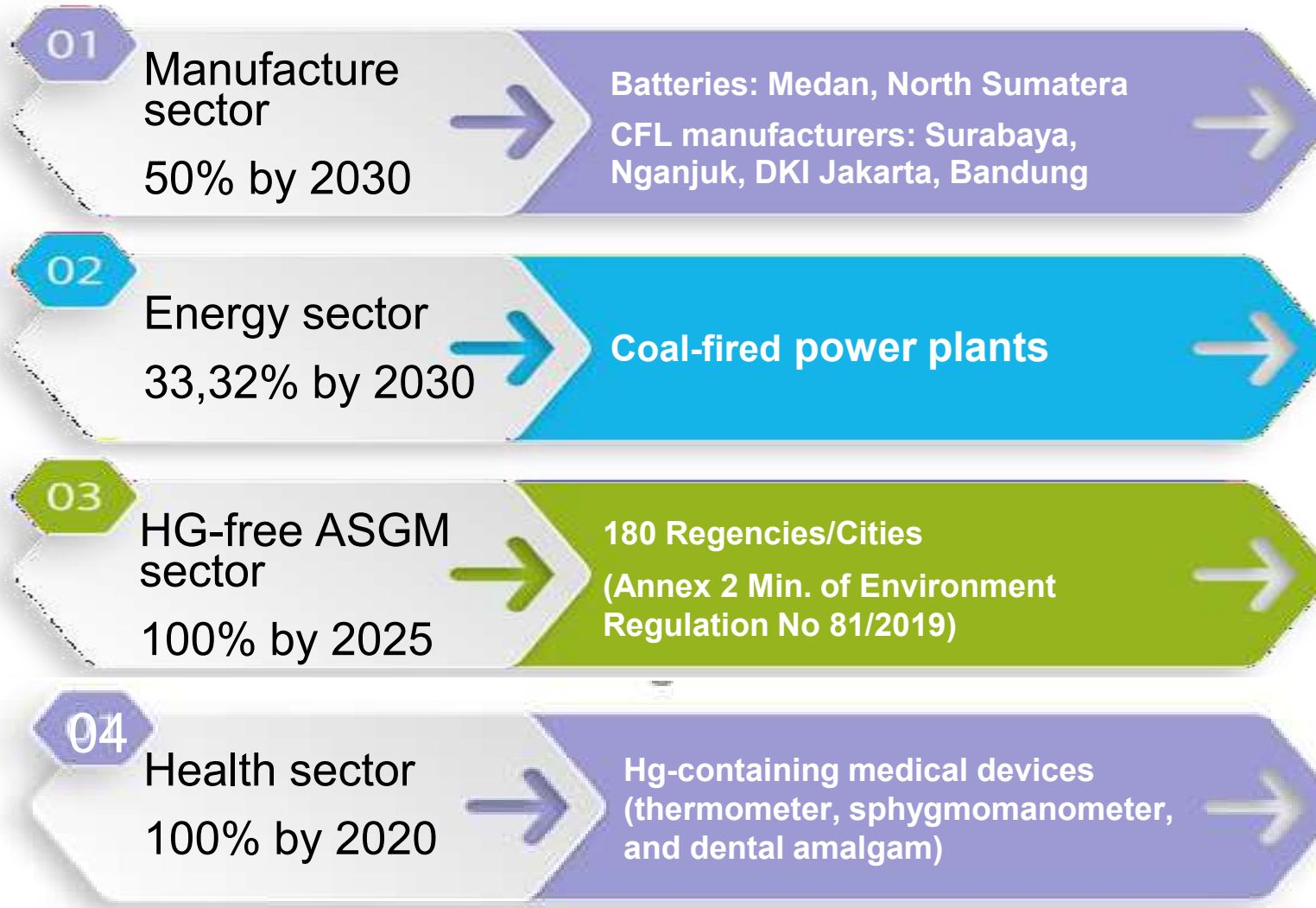
The Implementation of Minamata Convention: Legal Framework

- Law No. 11/2017 on the Ratification of Minamata Convention on Mercury (**UU No. 11/2017 tentang Pengesahan Konvensi Minamata Mengenai Merkuri**).
- Presidential Decree No. 21/2019 on National Action Plan on Reduction and Phasing Out of Mercury (**Perpres No.21/2019 tentang Rencana Aksi Nasional Pengurangan dan Penghapusan Merkuri**).
- Minister of Environment and Forestry Regulation No. 81/2019 on the Implementation of Presidential Decree No. 21/2019 (**Permen LHK No. 81/2019 tentang Pelaksanaan Perpres No. 21/2019**).
- Minister of Health Decree No. 41/2019 on Phasing Out of Health Equipment Containing Mercury from Health Facilities (**Permenkes No. 41/2019 tentang Penghapusan dan Penarikan Alat Kesehatan Bermerkuri di Fasilitas Pelayanan Kesehatan**).
- Minister of Environment and Forestry Regulation No. P.27/2020 on Waste Management of Medical Equipment Containing Mercury (**Permen LHK No. P.27/2020 tentang Pengelolaan Limbah Alat Kesehatan Mengandung Merkuri**).
- Minister of Trade Regulation No. 40/2022 jo. 18/2021 on Prohibited Goods to be Exported and Imported, Attachment X covers medical equipment containing mercury, elemental mercury is excluded from Attachment VII (**Permendag No. 40/2022 jo 18/2021 tentang Barang Dilarang Ekspor dan Barang Dilarang Impor - Lampiran X memuat alkes mengandung merkuri, sedangkan merkuri elemental tidak dicakup dalam Lampiran VII**).



Political will: Presidential Regulation and Bali Declaration

<https://peraturan.bpk.go.id/Home/Details/106019/perpres-no-21-tahun-2019>



President Regulation No. 21 year 2019 concerning the National Action Plan to reduce and eliminate mercury

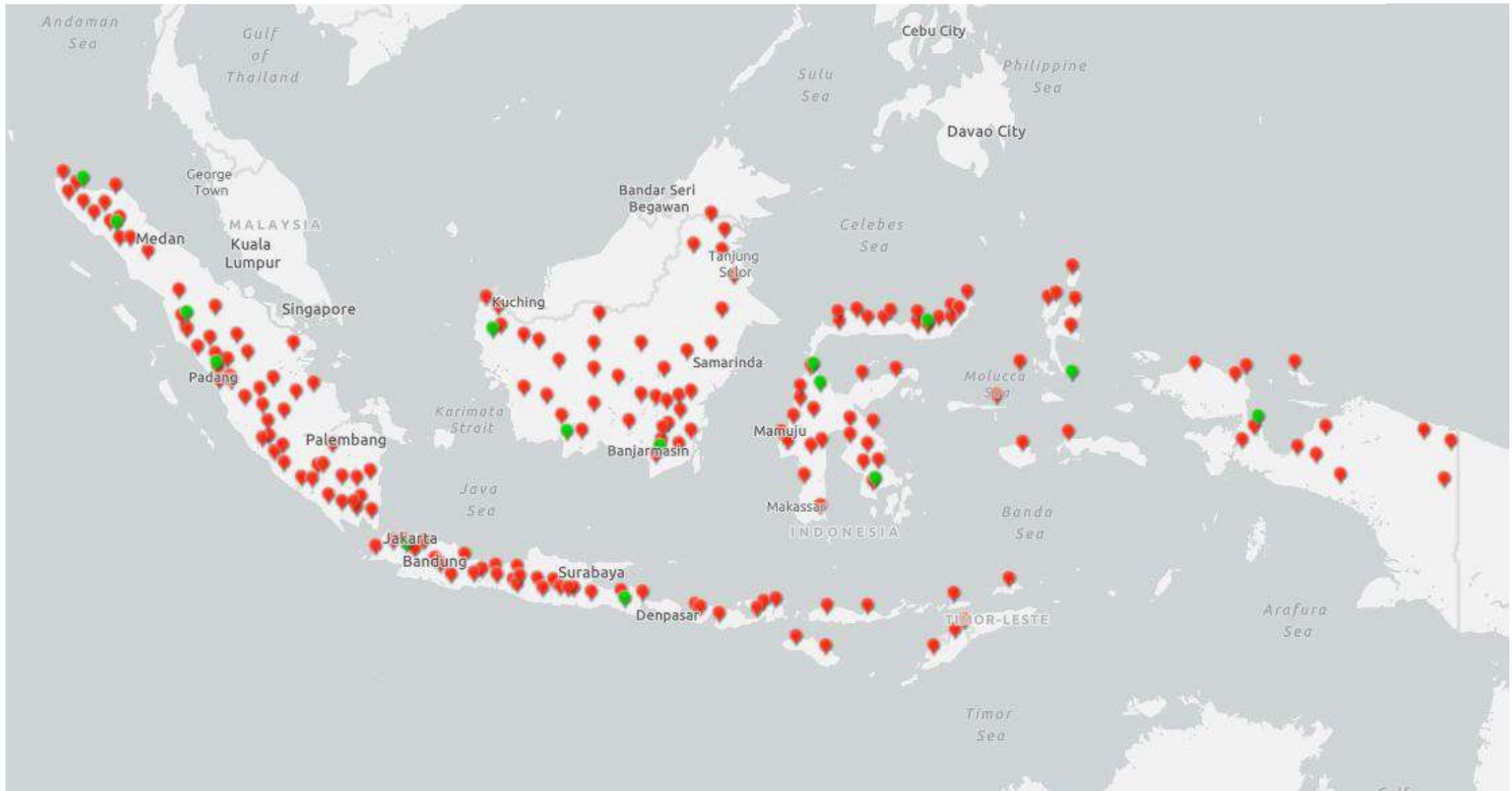


Bali Declaration on Combating Global Illegal Trade of Mercury (COP4 Minamata Convention, March 2022)



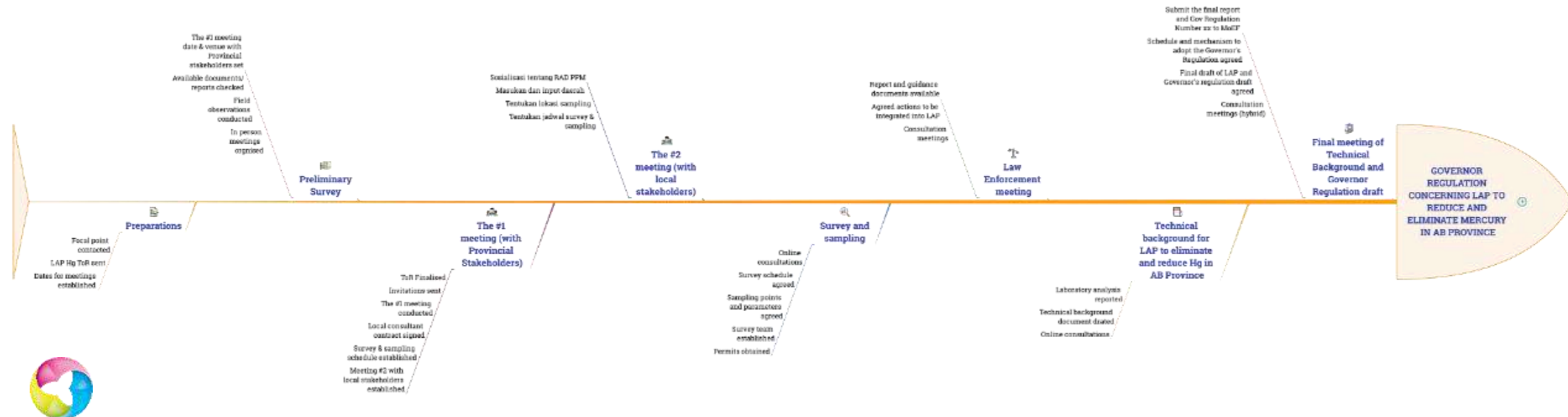
ASGM locations in 190 regencies

<https://bit.ly/2MsPt2M>



Development of Local Action Plans (LAPs) to Reduce and Eliminate Mercury at Sub-national Level

- The development of LAPs to reduce and eliminate mercury is mandated by Presidential Regulation No. 21/2019
- At sub-national level (Provincial level) and or Local Government level (City/Regency)
- Coordinated by the Ministry of Environment and Forestry, facilitated by various groups/projects
- Lead by the focal point of LAP at the Provincial level
- Priority sectors: ASGM, energy sector, trade and manufactures, Hg in products (health sector)
- Additional: Law enforcement, awareness raising, Hg storage and identification of Hg-contaminated sites, Hg monitoring, mitigation and advisories

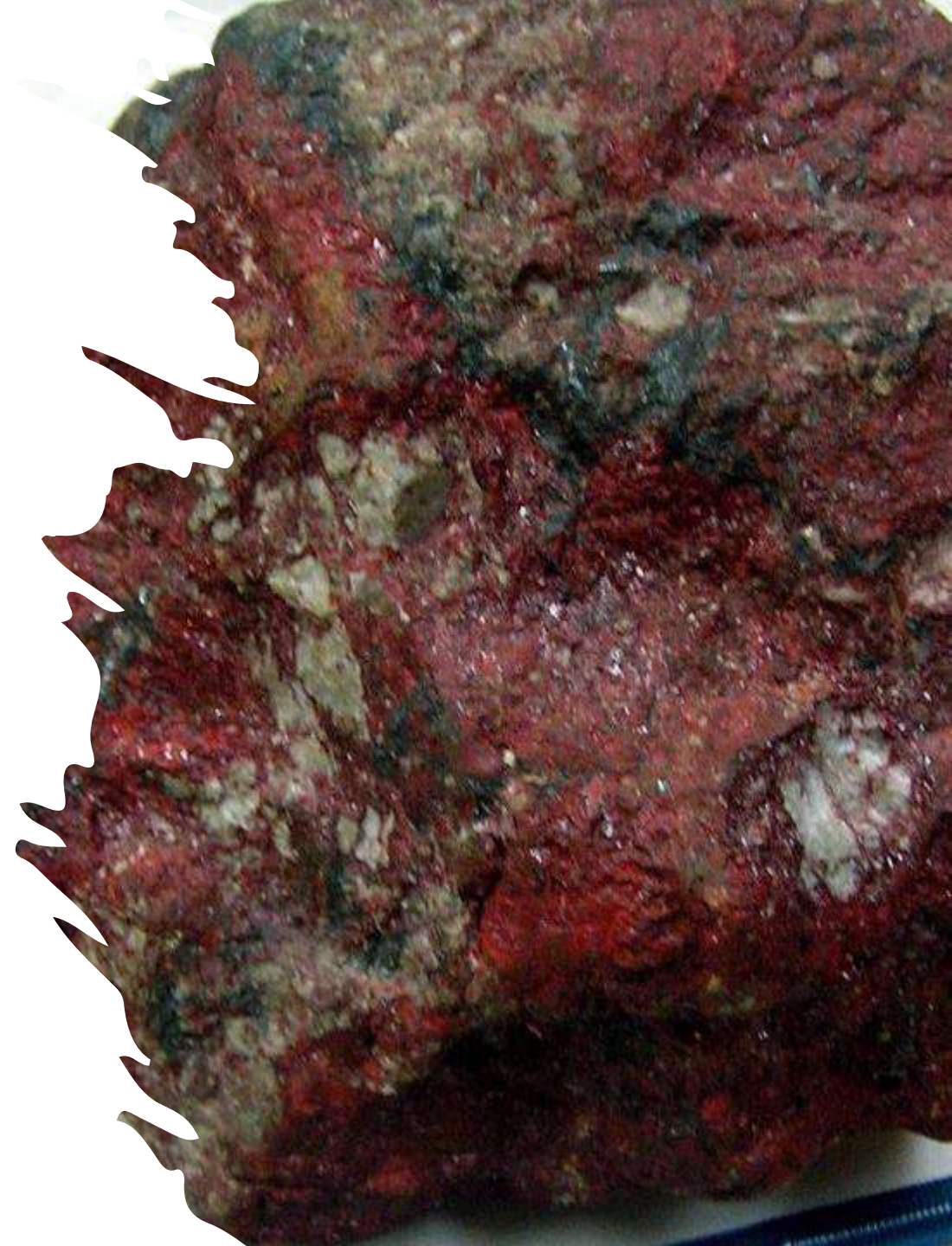


Gold market value IDR 72 to 135 trillion (USD 4.9 – 9.2 billions)



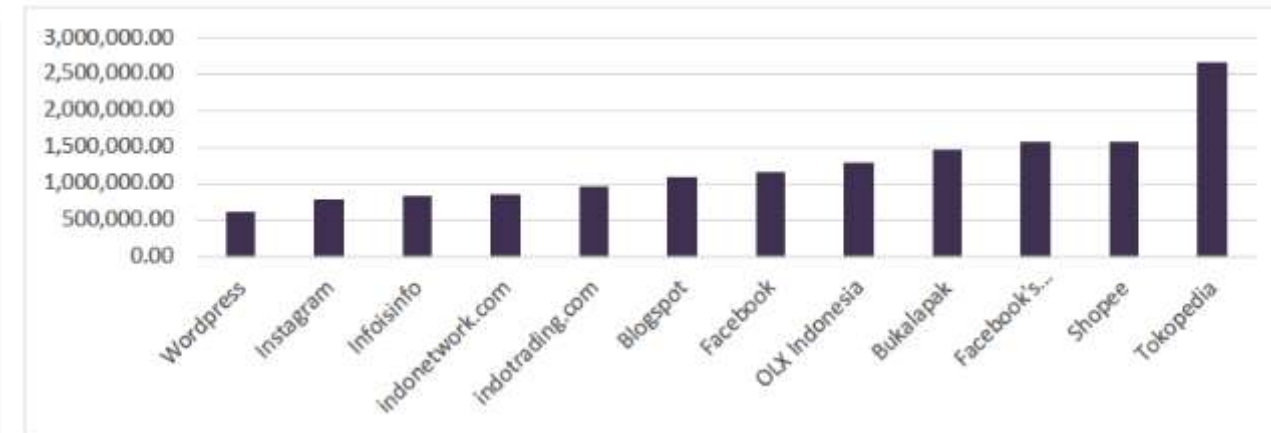
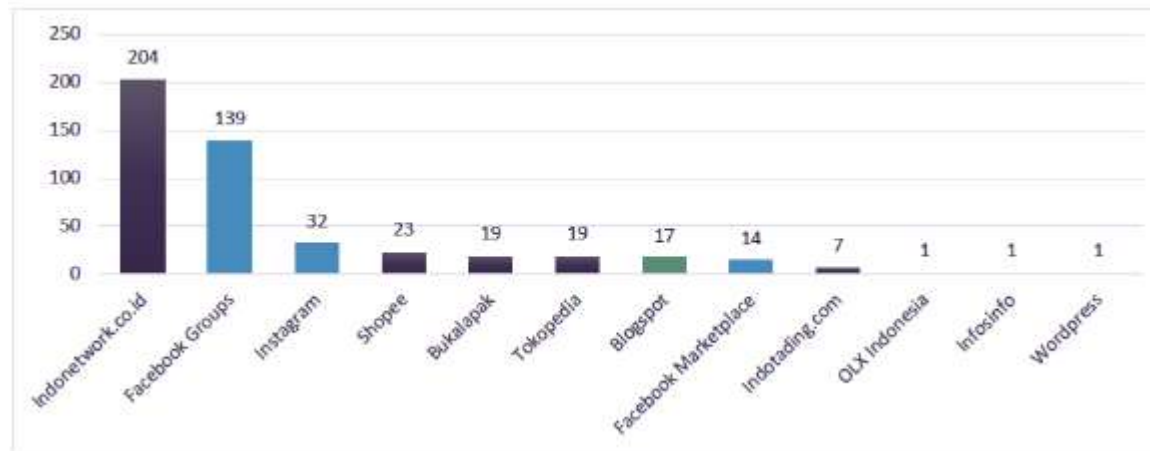
Regulatory Framework of Cinnabar and Hg Refineries

- Based on the Mining Law No. 3/2020, cinnabar is not a metal mineral that is prohibited to be mined.
- There is no regulation that specifically deals with the prohibition of cinnabar mining and refinery, as well as commercialization of mercury.
- In Government Regulation No. 74/2001 regarding Management of Hazardous and Toxic Substances (*Bahan Berbahaya dan Beracun* or B3), mercury is not a prohibited hazardous substances (B3) but a B3 with limited use.
- No criminal provision under Government regulation No. 22 of 2021 regarding the Implementation of Environmental Protection and Management and Minister of Trade Regulation No. 47 of 2019, only administrative sanctions





“Digital” Mercury



Advertisement based on platform: purple: e-commerce, blue – social media, green – other. Source: GITOC

Mean price of mercury sold in social media and e-commerce platform. Source: GITOC



Group Name	Date Created	Number of members	Number of Advertisements
Jual Beli Air Raksa (Mercury Hg)	09 June 2013	3,673	108 (71%)
Penambang emas	18 January 2013	120,344	22 (14%)
info Anak PENAMBANG EMAS	06 August 2020	24,866	5 (5%)
grup pelebur logam mulia nasional.	19 December 2020	2,797	1 (1%)
Facebook marketplace			14 (9%)

Hisyam Mustofa Baswedan
12h · 🌐

Di cari kopi silver 300 kg, trima di sby, klo brg sdh di dpn mata sya, sya bayar kes via transf rek BCA utk yg 200 kg, yg 100 kg sya minta tempo 3 hari. Klo ada yg minat dan percaya sma sya silahkan kirimkan brgx mlm ini juga, oke trims 🙏

👍 2 10 comments

👍 Like 💬 Comment ➦ Share

View 6 more comments All comments ▾

Garang An Saw Ah
Redy sby gan dekat tugu pahlawan 200kg hrg 800/kg.. ambil bnyk negoo kalau minat SMS atw TLP 0858-5321-6308
Like · Reply · Share · 4 h

Hisyam Mustofa Baswedan Author
Klo ga percaya sma sya wes ga usah nawari brg, aku duduk kape maling alias ngetampok
Like · Reply · Share · See translation · 2 h

Write a public comment... 🗨️ 📷 📹 📱 📎

Kawel Kawel
24 September at 17:20 · 🌐

Monggo di borong bos* ... Cod jabodetabek, Jumat berkah.. Ada promo spesial 🎉



CONTACT SELLER: **borong** Message

Rizal
30 September at 04:16 · 🌐

Jual air raksa hg cod seputaran jakarta dan kalimantan harga 850 ribu sekilo
Wa 082210312538
Pengiriman luar kota
Juga bisa

CONTACT SELLER: **Jual air raksa** Message

👍 1 17 comments

👍 Like 💬 Comment ➦ Share

View 8 more comments All comments ▾

Mhal Zerro Seveen
Kirim ke bogor bisa gx bos
Like · Reply · Share · 1 d

Tatep
Mhal Zerro Seveen bogor mna kang
Like · Reply · Share · 1 d

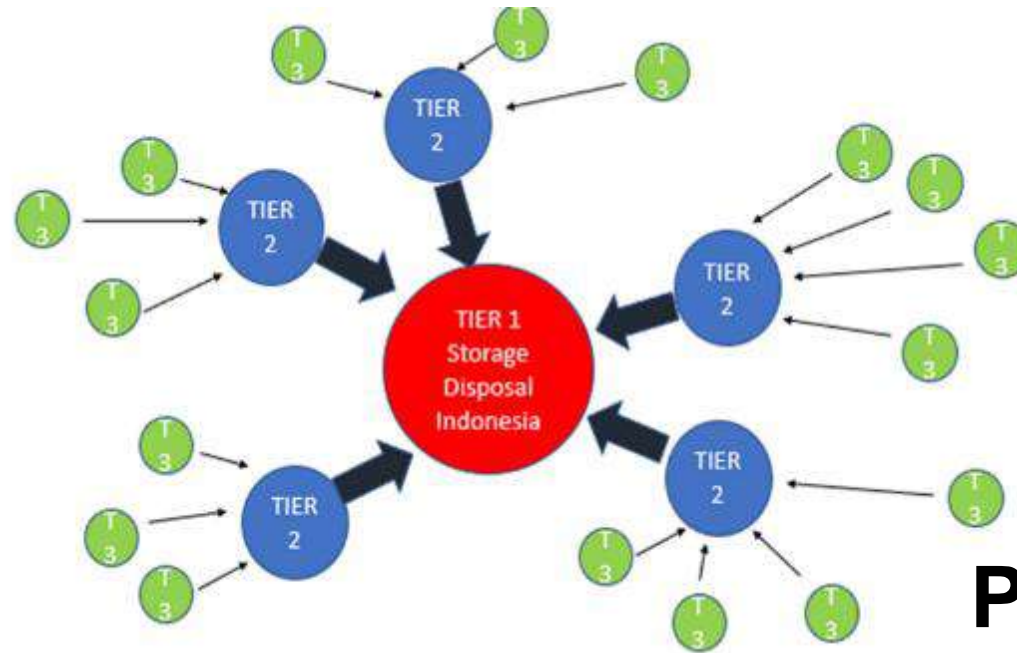
Mhal Zerro Seveen
Tatep nanggung

Qais Mandana Nafsah
18 September at 05:55 · 🌐

Entah isinya apa
Aku gak peduli
Yg penting Happy.
Selamat Ngopi.
harga (nbok atau Japri.
yg penting kualitas tenuji.

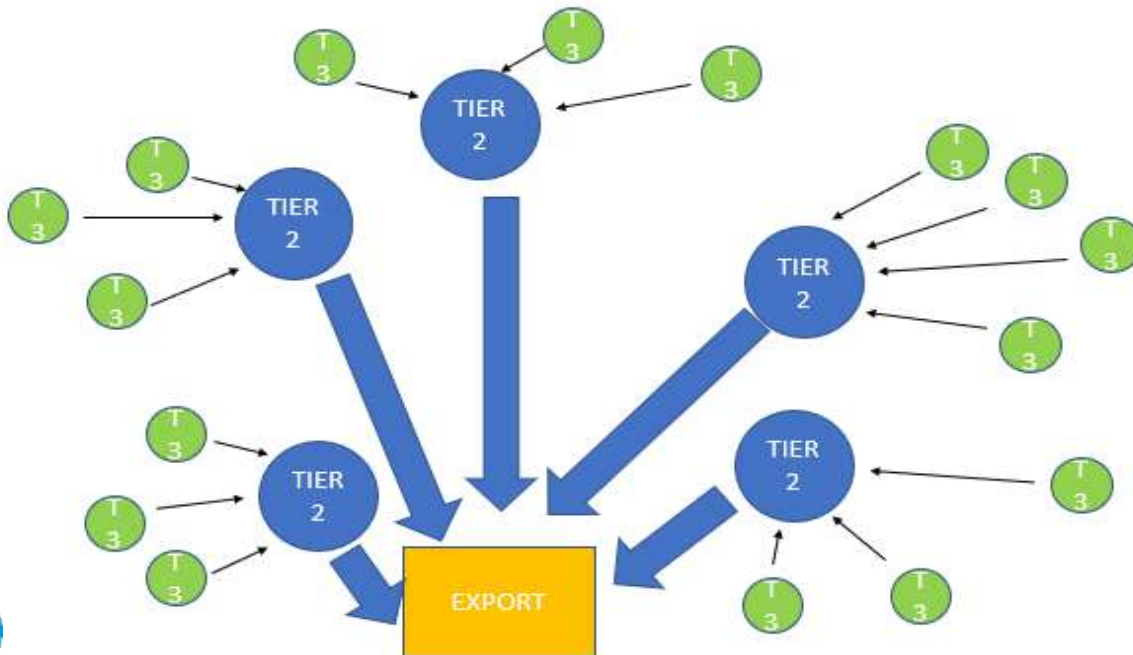



Scenario 1
schematic –
Domestic
mercury
storage and
disposal



Proposed Mercury Storage Scenarios

Scenario 2
schematic –
Interim
storage and
final export



Mercury Storage: Tier 3 Storage (Cities/Regencies Level)

- Small to medium-scale dangerous goods storage.
- Depending on demand in different provinces, numerous Tier 3 storage units of various sizes may be deployed for police, medical facilities and other authorities who directly remove and handle mercury.
- The objective is to provide short term storage that minimises exposure risk to personnel until mercury is collected to Tier 2.



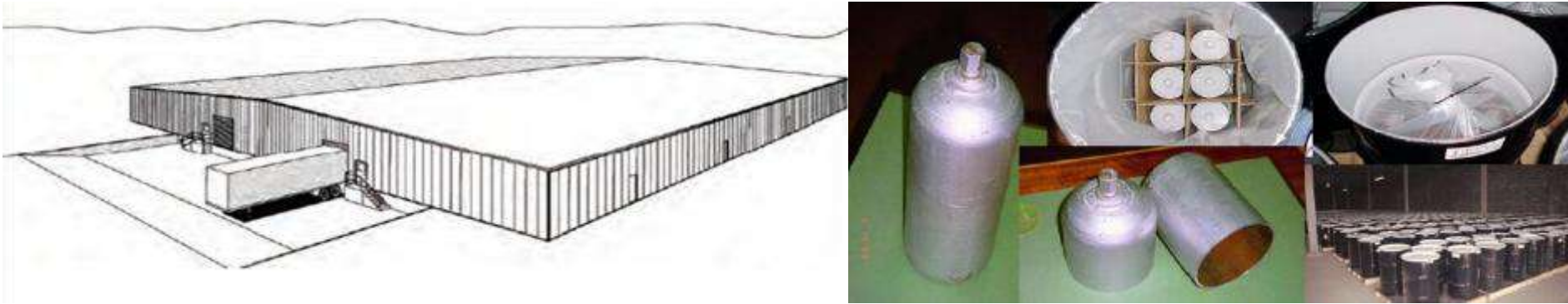
Mercury Storage: Tier 2 Storage (Provincial Level)

- 3-5 compact interim storage facilities located on major islands with ASGM activity.
- Meet high safety and security standards storing up to 10 tonnes of elemental mercury.
- Purpose built with trained staff for storing, decanting, overpacking and shipping of elemental mercury.



Mercury Storage: Tier 1 Storage (National Level)

A single national storage/disposal facility ideally incorporating an elemental mercury treatment/stabilisation facility.



Surface/above the ground long term storage for elemental mercury



Cinnabar (Mercury Sulphide)

Sub-surface long term storage for stabilized mercury and cinnabar



Recommendations

Regulatory Framework

- Mercury is not listed as a prohibited substance to be traded under LARTAS (prohibition and restriction) policy, it can be imported (for non-mining and specific purposes) and it can be exported, so it should be classified and regulated as “prohibited substance”;
- Digital/online mercury trade needs to be regulated and prohibited;
- The policy for phasing out mercury and controlling mercury trade must be comprehensive and include cooperation and coordination between all stakeholders in their respective roles.

Law Enforcement

- Law enforcement should be focused on the masterminds, not only the small players in mercury trade;
- Guidance to identify safe methods to handle and store confiscated mercury and withdrawal mercury from the market is needed especially to implement court orders regarding “the destruction” and/or “the disposal” of mercury;
- The infrastructure for temporary and final storage/disposal of mercury should be prepared and established.





THANK YOU



NEXUS3
FOUNDATION

Website: www.nexus3foundation.org

Email: nexus3@nexus3foundation.org

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds, and Mercury-Added Skin Lightening Products



3-4 JUNE 2025



8:30 AM - 5:30 PM



COLOMBO, SRI LANKA



Experiences from

Environmentally Sound Management (ESM) of Mercury Containing Medical Measuring Devices (MCMMD's)

Huno Solomon Kofi Mensah



RRC.AP
Regional Resource Centre for
Asia and the Pacific

Fund Support

Japan ASEAN Integration Fund (JAIF)

Period

Nov 2019 – Sept. 2021

Project Proponent

EMB-DENR, the Philippines; MOEF Indonesia

Implementing Agency (IA)

AIT Regional Resource Centre for Asia and the Pacific (AIT RRCAP)

Project steering committee

Proponent, IA,
Environment Division of ASEC (AWGCW),
Japan Mission to ASEAN,
Ministry of the Environment, Japan (MOEJ)

Project team

Experts from IA, International consultant, National focal point,
national/local consultant



Project Objectives and Scope

Project Title

Development of Capacity for the Substitution and the Environmentally Sound Management (ESM) of Mercury-containing Medical Measuring Devices (MCMMD's)

Goal

Preventing the adverse impacts of mercury on health and the environment through the environmentally sound management, namely used thermometers and sphygmomanometers, in the ASEAN Member States.

1. Assess Current Practices

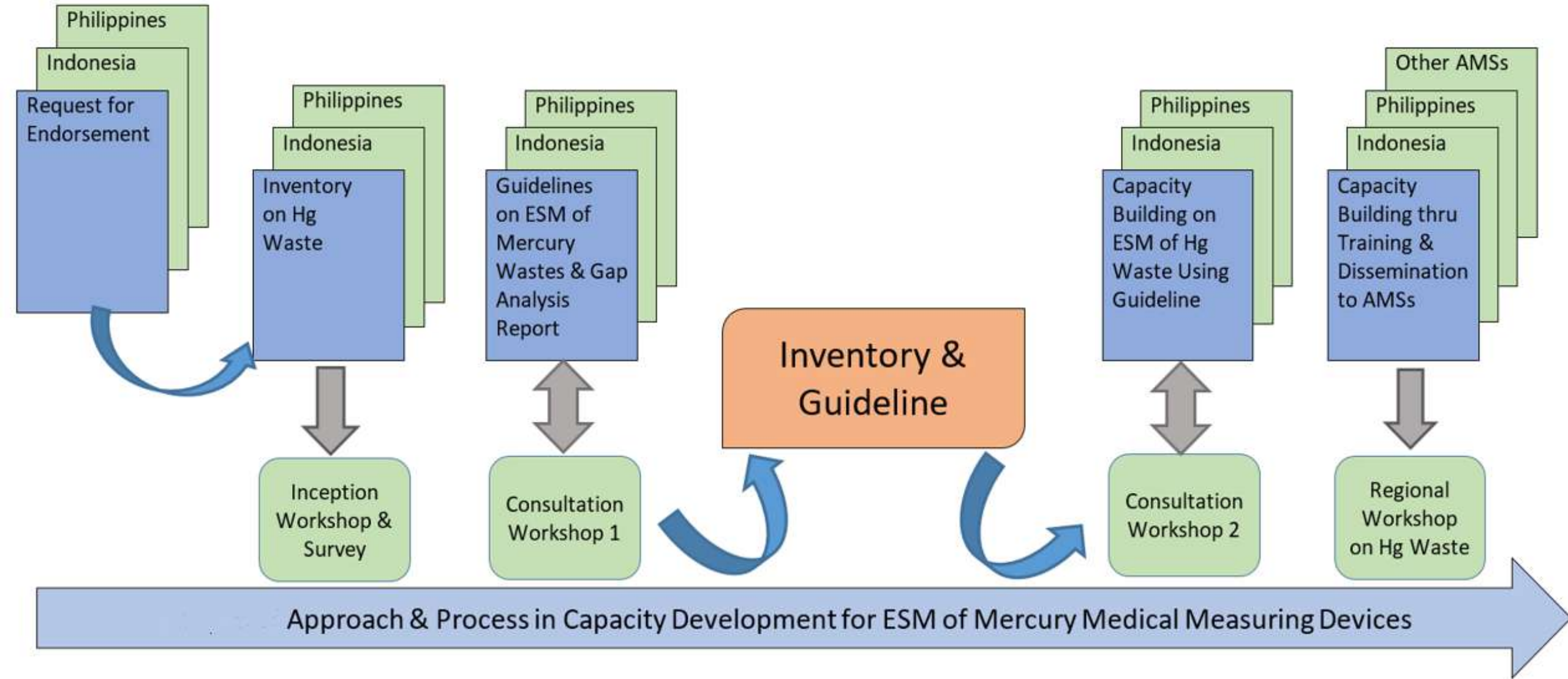
Understand how mercury-containing medical devices are used, replaced, collected, stored, and disposed of in Indonesia and the Philippines.

2. Identify Gaps & Improve Guidelines

Review or develop guidelines for safe collection, storage, recycling, and disposal of mercury devices in healthcare and municipal settings.

3. Promote Environmentally Sound Management (ESM)

Raise awareness and share lessons learned to support wider adoption and replication across ASEAN countries.



1. Assess Current Practices
2. Identify Gaps & Improve Guidelines
3. Promote Environmentally Sound Management (ESM) in ASEAN

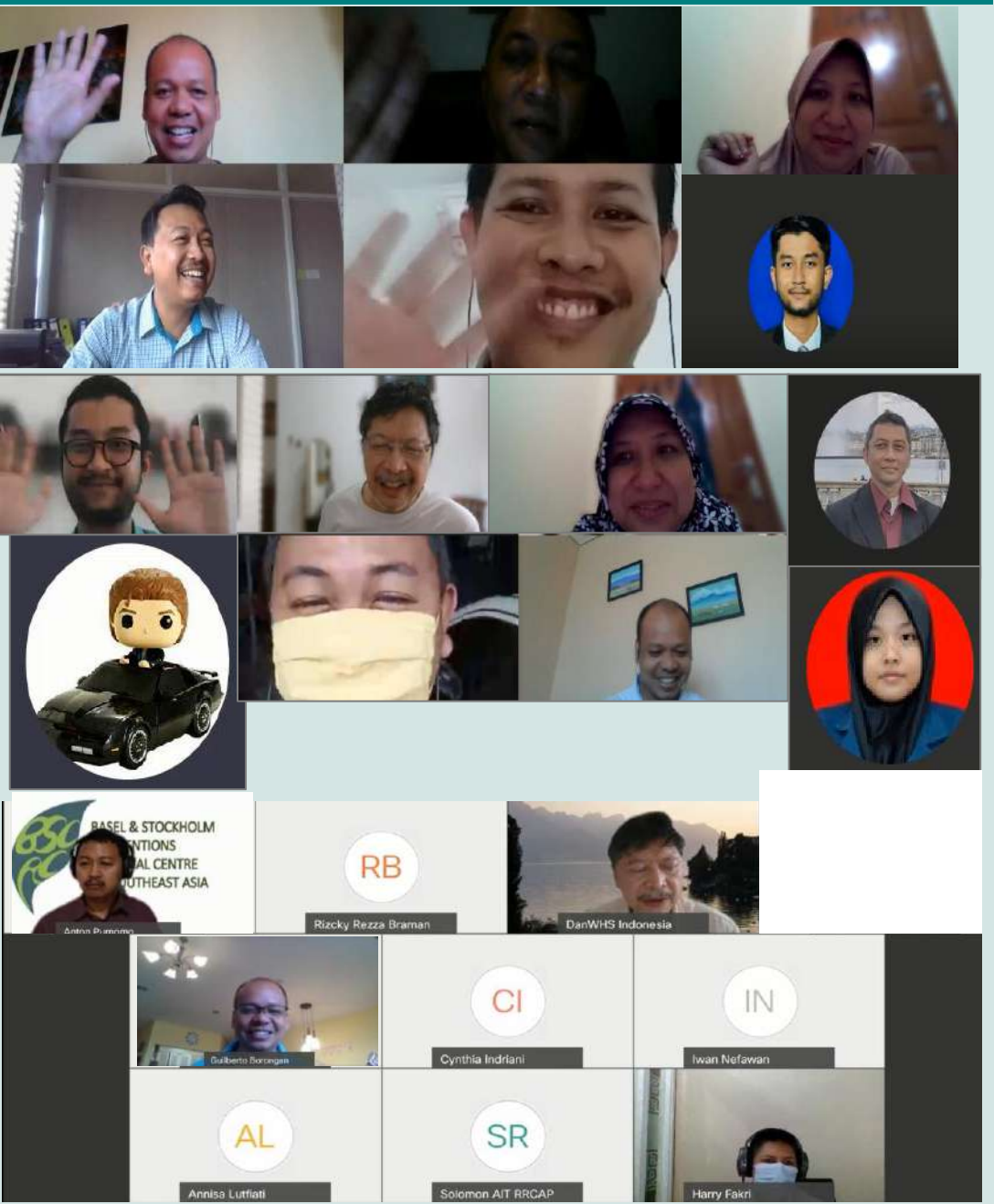
Indonesia



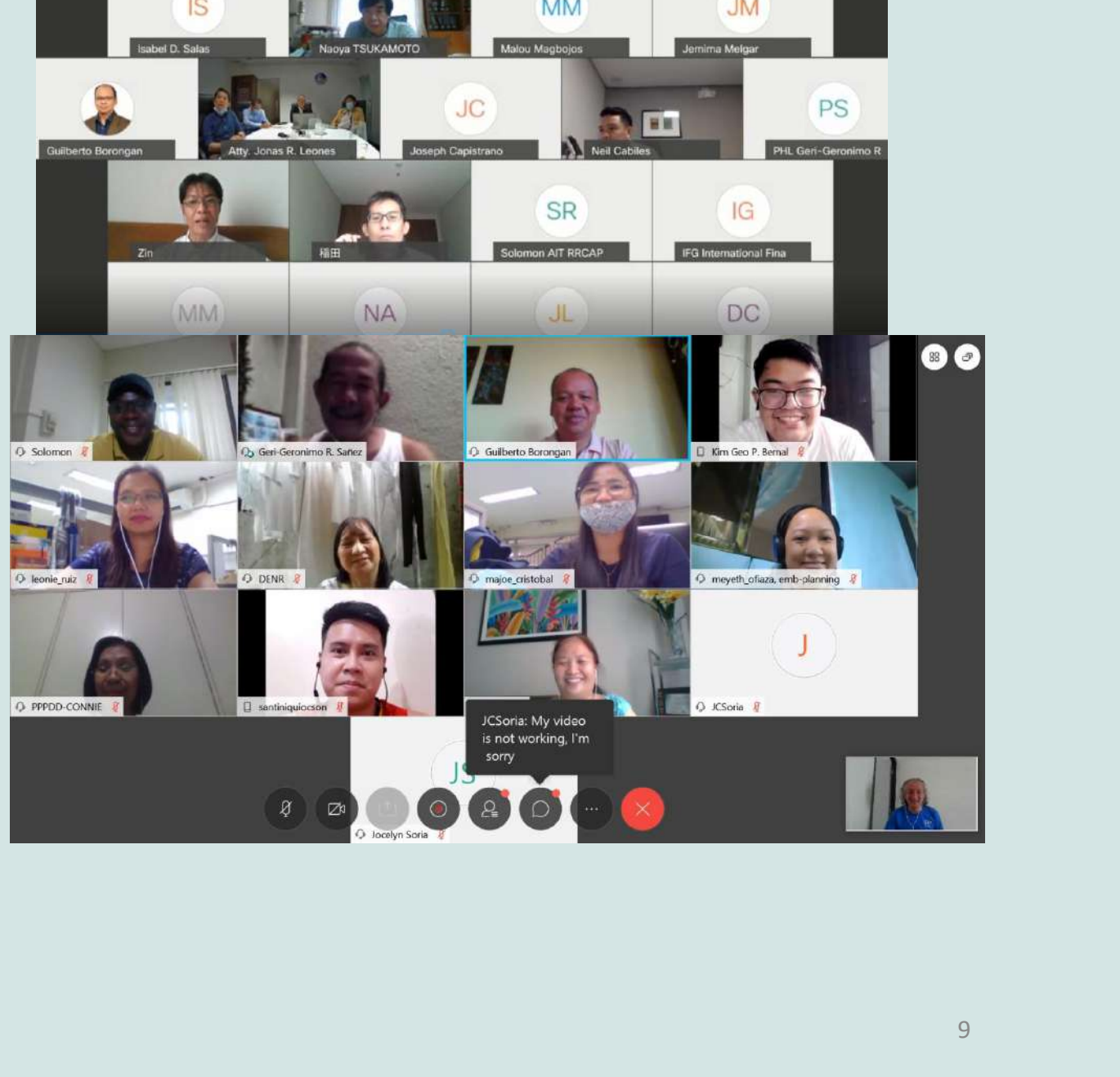
1. Kick-off Meeting," Jakarta, 18-19 Nov 2019
2. Inception Workshop in Indonesia Jakarta, 11 March 2020
3. Field visits and consultations



Virtual Meetings during the COVID Pandemic

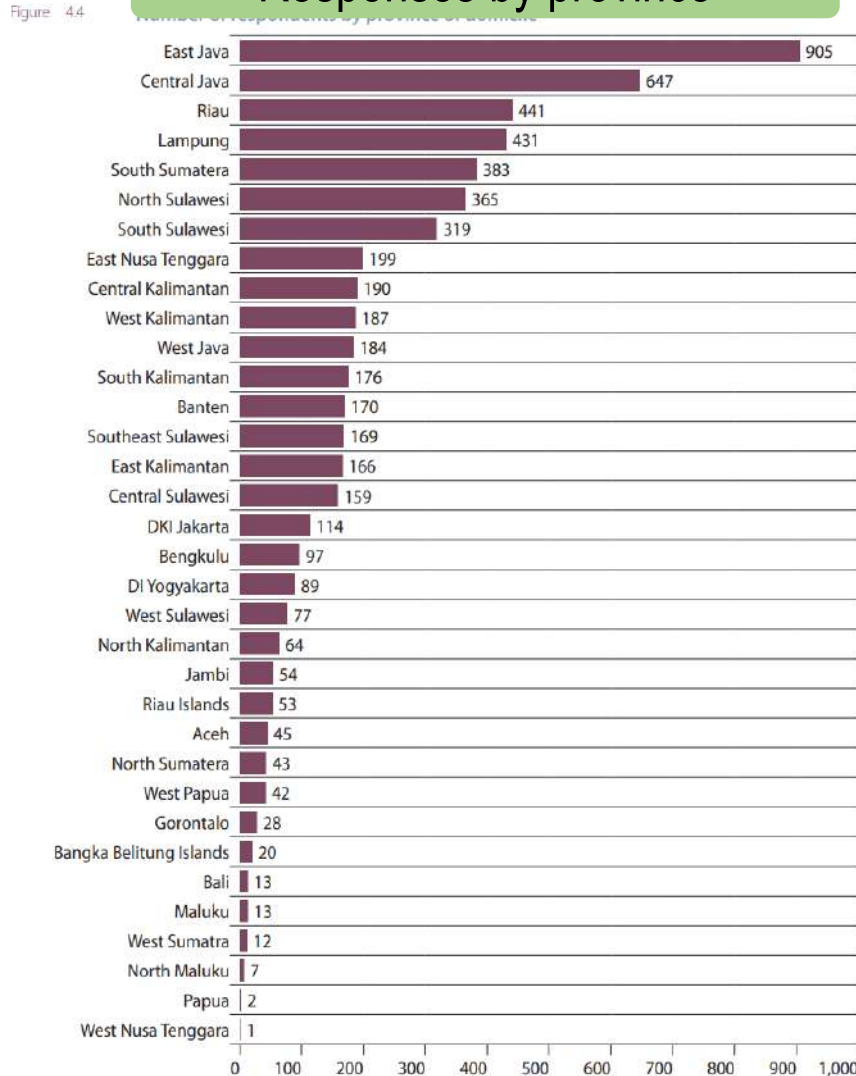


Virtual Meetings during the COVID Pandemic



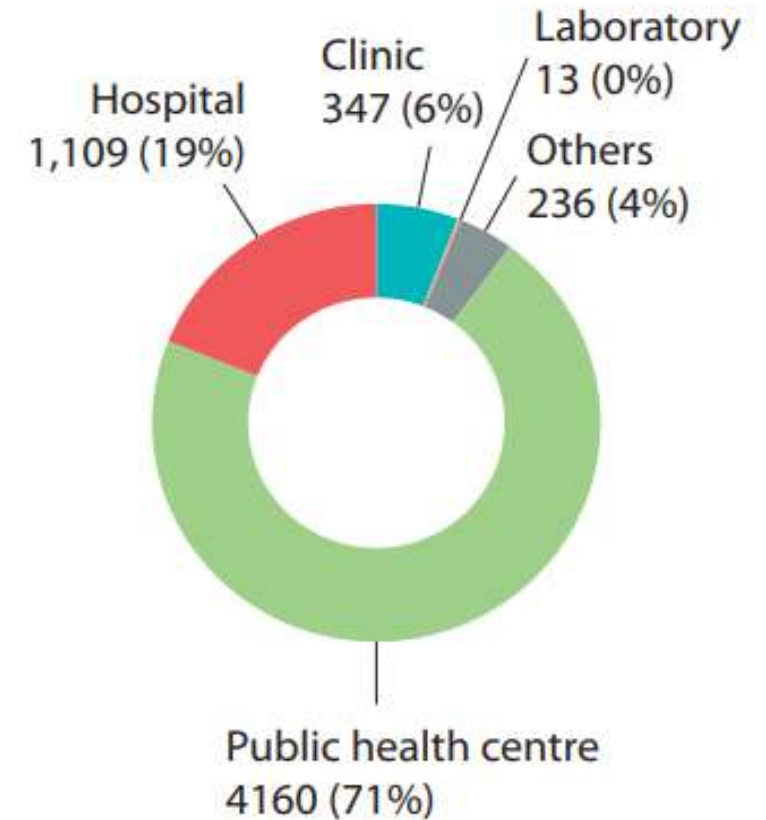
Situation Assessment

Responses by province



Responses by facility types

Figure 4.1 Number of respondents by type



Sampling frame:

- Large sized hospital (> 200 bed count)
- Public health centres,
- Laboratories
- Private clinics

Target (N): 23,509
(n= 5,247)

Both off-line and online
questionnaire response

Survey cut off: 31 August
2020

Sampling frame:

- Large sized hospital (> 200 bed count)
- Public health centres,
- Laboratories
- Private clinics

Target (N): 23,509
(n= 5,247)

(Off-line & online questionnaire)

34 Provinces

Survey cut off :
31 August 2020

100% substitution by 2020 (Presidential Decree No. 21/2019; Ministry of Health Regulation No. 41/2019)

Figure 4.11

Initial MCMMD's by Province

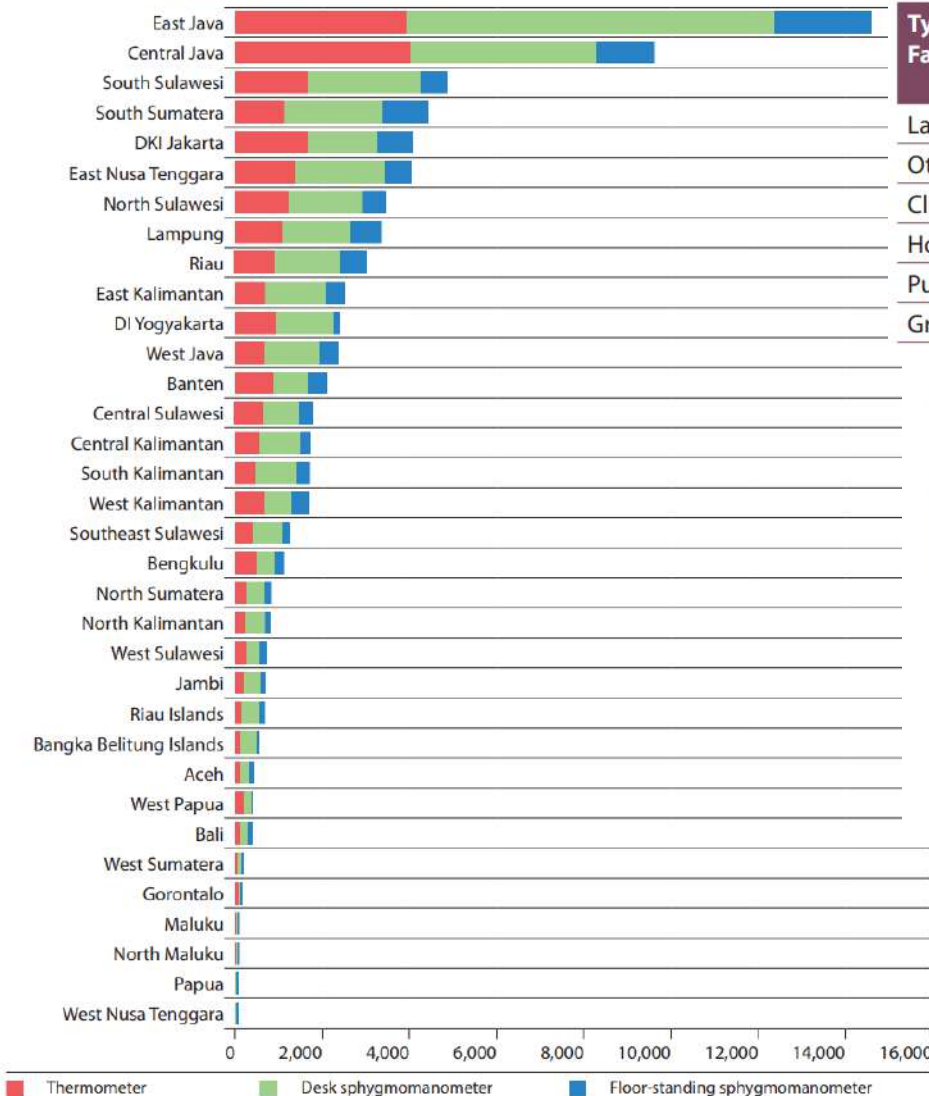


Table 4.3

Initial MCMMD's by Facility Type

Type of Healthcare Facilities	Thermometer (Unit)	Desk Sphygmomanometer (Unit)	Floor-standing Sphygmomanometer (Unit)	Total (Unit)
Laboratory	21	10	0	31
Other	79	101	35	215
Clinic	280	424	147	851
Hospital	9,419	13,765	5,934	29,118
Public Health Centre	15,251	23,995	6,446	45,692
Grand Total	25,050	38,295	12,562	75,907

Table 4.5

MCMMD's Still in Use (by Facility Type)

Type of Healthcare Facilities	Thermometer (Unit)	Desk Sphygmomanometer (Unit)	Floor-standing Sphygmomanometer (Unit)	Total (Unit)
Laboratory	12	2	0	14
Other	53	44	18	115
Clinic	50	106	62	218
Hospital	1,220	3,990	1,575	6,785
Public Health Centre	3,163	5,811	1,956	10,930
Grand Total	4,498	9,953	3,611	18,062

total MCMMD devices still used by the healthcare facilities respondents
= 18,062 units

- Desk Sphygs (55%);
- Floor standing Sphygs (20%);
- Thermometers (25%)

Figure 4.31

Broken MMCD's by Province

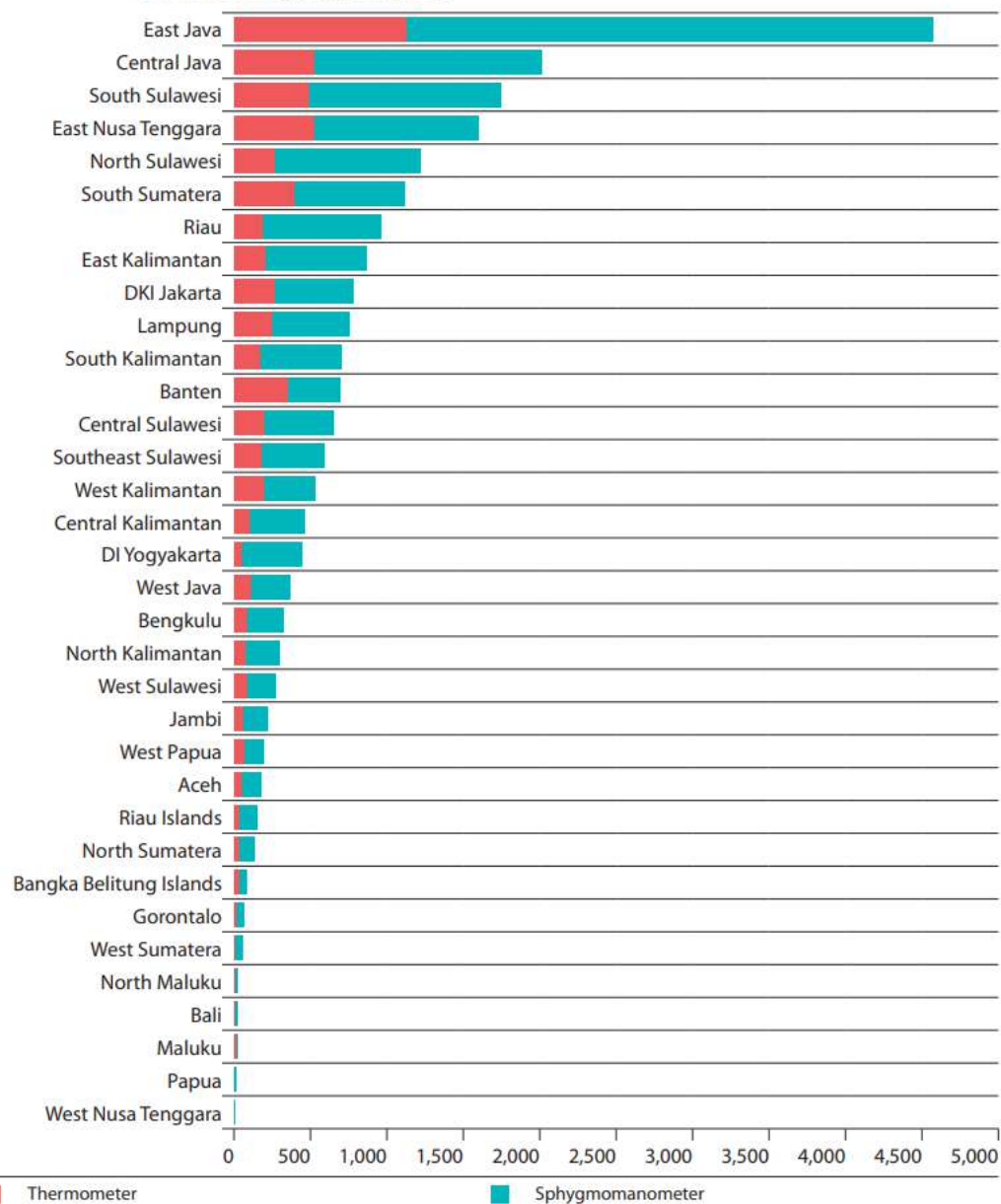
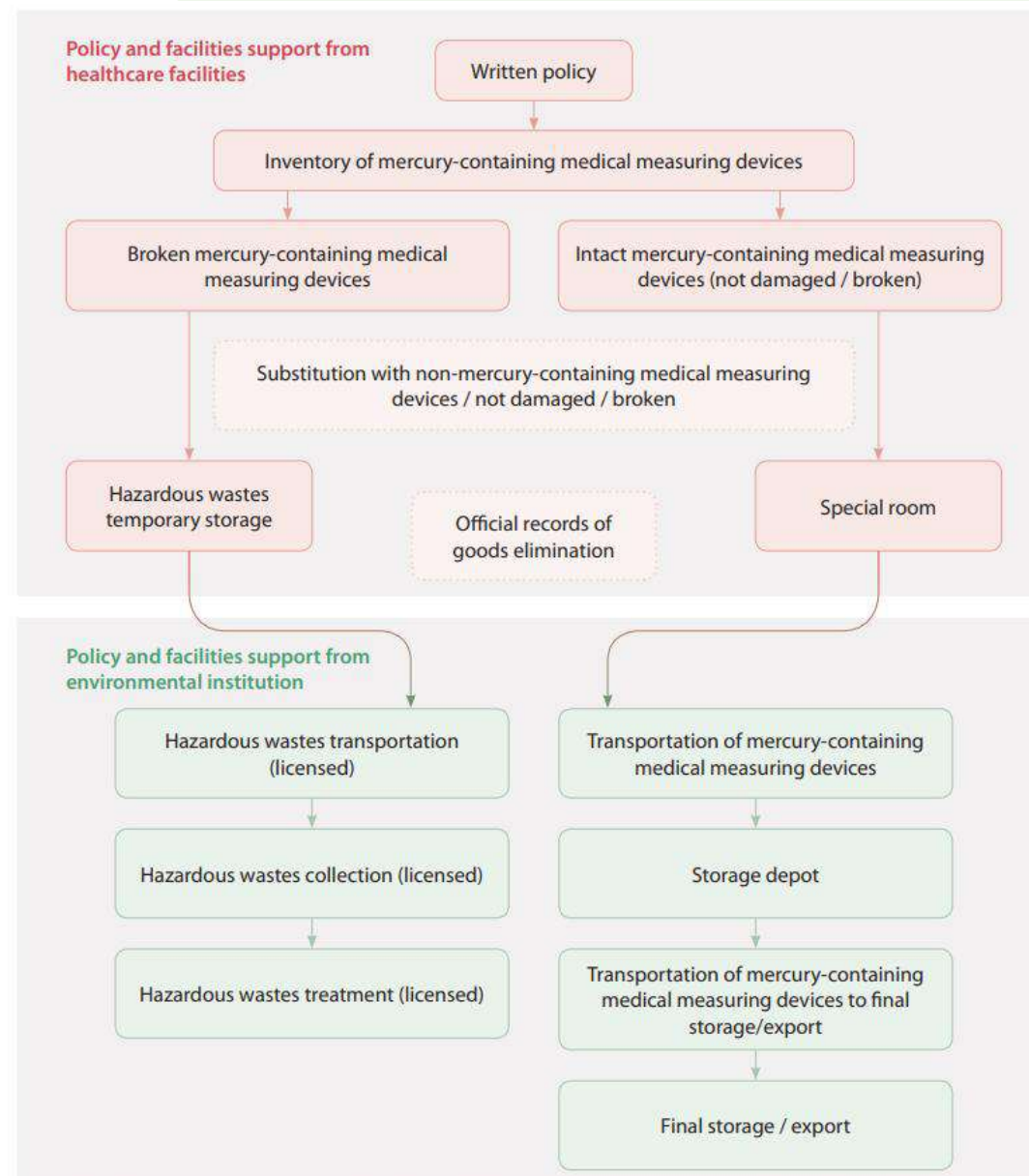


Figure 4.5

MMCD's Elimination Approach



Source: Adapted from MoH, 2019

Indonesia

Key constraints

- **Low awareness** of relevant regulations and national policies on mercury withdrawal.
- **Limited understanding** of the accuracy and **reliability of mercury-free substitutes**.
- **Lack of clarity** on the **national strategy and process** for device elimination.

Recommendations

- **Continue awareness campaigns** to encourage healthcare facilities to **report mercury device phase-out**.
- **Improve data collection** to track progress and plan storage needs.
- **Support healthcare facilities** with guidance to overcome phase-out challenges.
- **Check and verify reported** data to ensure reliable information.

Philippines

Key constraints

- MCMMDs Data (and capacity to assess the status of phase out)
- Lack of Access to accredited TSD facilities
- **Lack of Technical Knowledge on Waste Management**

Recommendations

- Continue online awareness to boost reporting by healthcare facilities.
- Enhance data collection for better tracking and storage planning.
- Offer support to address phase-out challenges.
- Give clear instructions for accurate reporting.
- Validate data to ensure quality and reliability.



Situation
Assessment of
the Management
of Mercury-Containing
Medical Measuring
Devices in Indonesia



Situation
Assessment of
Mercury-Containing
Medical Measuring
Devices in the Philippines



Technical
Guidelines for the
Substitution and
the Environmentally
Sound Management of
Mercury-Containing Medical
Measuring Devices
in Indonesia



Technical
Guidelines for the
Environmentally
Sound Management
of Mercury-Containing
Medical Measuring Devices
in the Philippines

THANK YOU!

Huno Solomon Kofi Mensah

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Specialist, [Waste and Resource Management](#)

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RRC.AP

Regional Resource Centre for
Asia and the Pacific



HS codes for Mercury-added Products

Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products
3 – 4 June 2025

Kyaw Nyunt Maung, UNEP

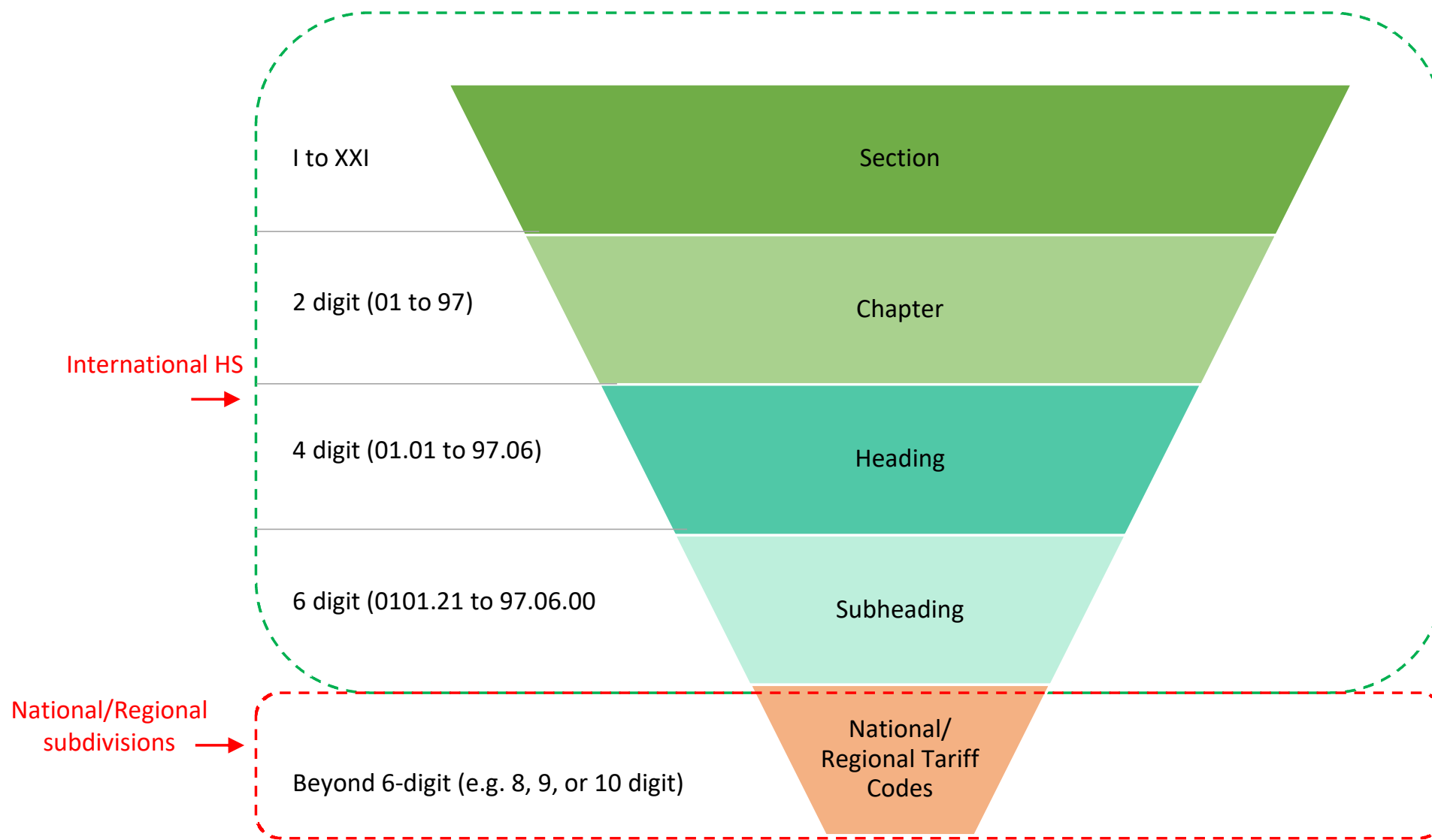
Objectives

- Implement the Minamata Convention:
 - Article 4 obligations to phase out the manufacture, import, and export of mercury-added products listed in Annex A
 - Article 21 reporting requirements
- Understand imports and exports of mercury-added products
- Understand the process for creating sub-codes with more than 6 digits
- Prioritize their mercury reduction activities through HS codes

Current HS codes

- "Harmonized System" (HS) of 6-digit codes has been developed and maintained by the World Customs Organization (WCO).
- More than 200 countries have applied the Harmonized System to identify internationally traded goods
- Sub-codes of more than 6 digits may be created by national and regional authorities
- Most present codes (even to 10 digits) do not segregate Hg-added products

Use of customs codes to distinguish mercury-added products



HS codes for products that may be mercury-added products

Mercury-added products	HS code	Description
Batteries	8506	Primary cells and primary batteries
	8506.10	- Manganese dioxide
	8506.30	- Mercuric oxide
	8506.40	- Silver oxide
	8506.60	- Air-zinc
	8506.80	- Other primary cells and primary batteries
Switches and relays	8535	Electrical apparatus for switching or protecting electrical circuits, or for making connections to or in electrical circuits (for example, switches, fuses, lightning arresters, voltage limiters, surge suppressors, plugs and other connectors, junction boxes), for a voltage exceeding 1,000 volts.

Switches and relays	8535.30	- Isolating switches and make-and-break switches
	8535.90	- Other
	8536	- Electrical apparatus for switching or protecting electrical circuits, or for making connections to or in electrical circuits (for example, switches, relays, fuses, surge suppressors, plugs, sockets, lamp-holders and other connectors, junction boxes), for a voltage not exceeding 1,000 volts; connectors for optical fibres, optical fibre bundles or cables.
	8536.41	- Relays - for a voltage not exceeding 60V
	8536.49	- Relays - Other

Switches and relays	8536.50	- Other switches
	9032.10	- Thermostats
	9032.20	- Manostats
Lamps	8539.31	- Discharge lamps, other than ultra-violet lamps : Fluorescent, hot cathode
	8539.32	- Discharge lamps, other than ultra-violet lamps : Mercury or sodium vapour lamps; metal halide lamps
	8539.39	- Discharge lamps, other than ultra-violet lamps : Other

HS codes for products that may be mercury-added products

Cosmetics	3304	Beauty or make-up preparations and preparations for the care of the skin (other than medicaments), including sunscreen or sun tan preparations; manicure or pedicure preparations.
	3304.10	- Lip make-up preparations
	3304.20	- Eye make-up preparations
	3304.30	- Manicure or pedicure preparations
	3304.91	- Other : Powders, whether or not compressed
	3304.99	- Other - Other
	3401	Soap; organic surface-active products and preparations for use as soap, in the form of

Cosmetics	3401	as soap, in the form of bars, cakes, moulded pieces or shapes, whether or not containing soap; organic surface-active products and preparations for washing the skin, in the form of liquid or cream and put up for retail sale, whether or not containing soap; paper, wadding, felt and nonwovens, impregnated, coated or covered with soap or detergent.
	3401.11	- Soap and organic surface-active products and preparations, in the form of bars, cakes, moulded pieces or shapes, and paper, wadding, felt and nonwovens, impregnated, coated or covered with soap or detergent : For toilet use (including medicated products)

Cosmetics	3401.19	- Soap and organic surface-active products and preparations, in the form of bars, cakes, moulded pieces or shapes, and paper, wadding, felt and nonwovens, impregnated, coated or covered with soap or detergent: Other
	3401.20	- Soap in other forms
	3401.30	- Organic surface-active products and preparations for washing the skin, in the form of liquid or cream and put up for retail sale, whether or not containing soap

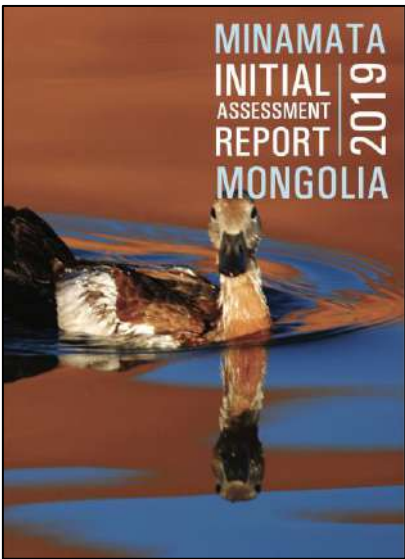
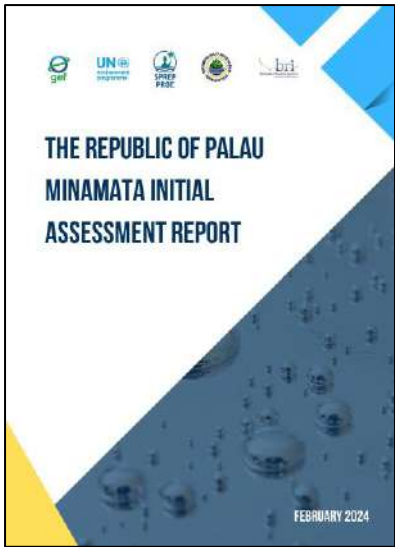
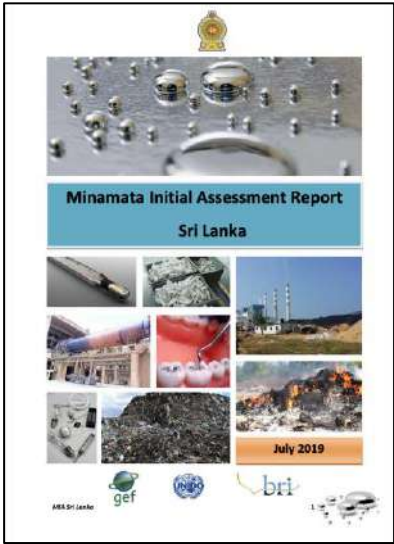
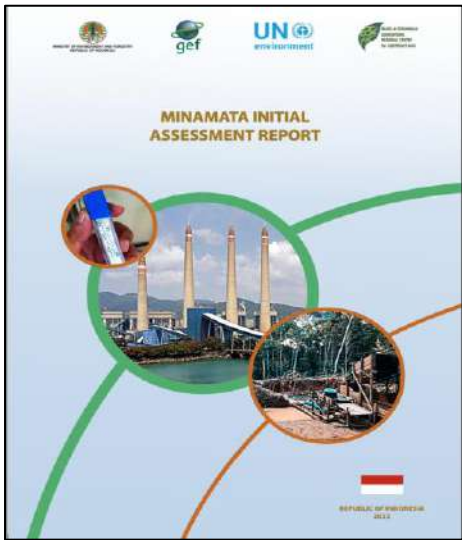
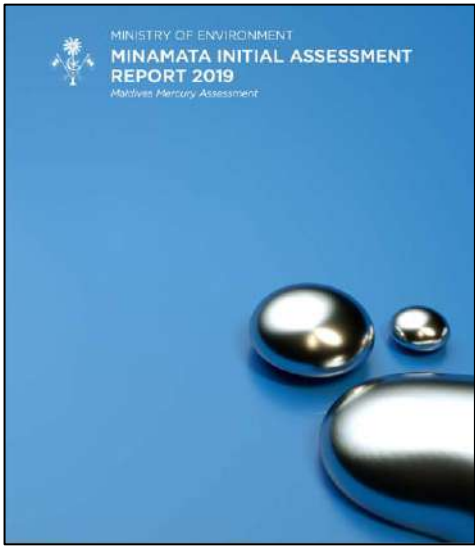
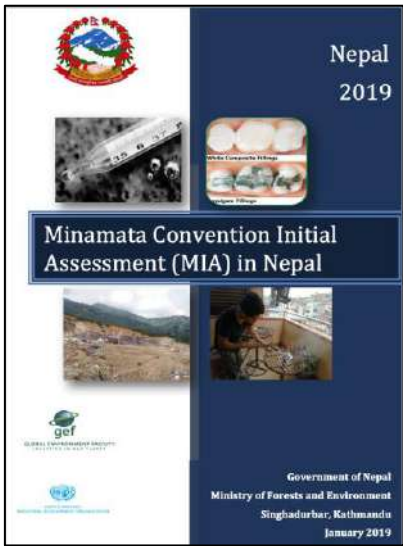
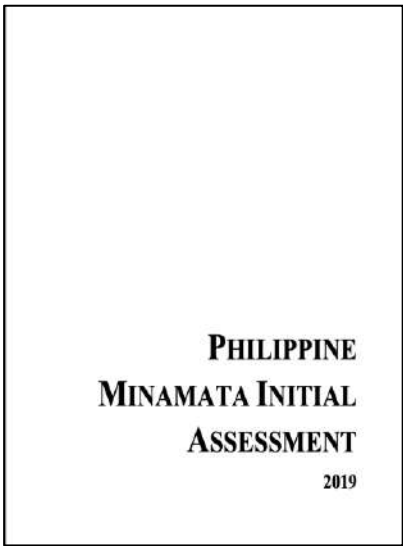
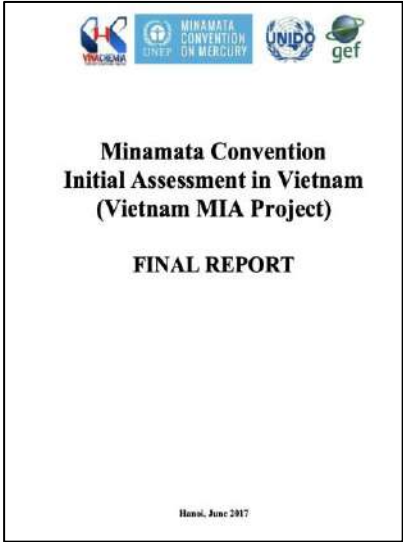
HS codes for products that may be mercury-added products

Pesticides, biocides and topical antiseptics	3004.90	Medicaments (excluding goods of heading 30.02, 30.05 or 30.06) consisting of mixed or unmixed products for therapeutic or prophylactic uses, put up in measured doses (including those in the form of transdermal administration systems) or in forms or packings for retail sale. - Other
	3808.59	Insecticides, rodenticides, fungicides, herbicides, anti-sprouting products and plant-growth regulators, disinfectants and similar products, put up in forms or packings for retail sale or as preparations or articles (for example, sulphur-treated bands, wicks and candles, and fly-papers). - Goods specified in Subheading Note 1 to this Chapter : Other

Measuring devices	9018.90	Instruments and appliances used in medical, surgical, dental or veterinary sciences, including scintigraphic apparatus, other electro-medical apparatus and sight-testing instruments - other instruments and appliances
	9025.11	- Thermometers and pyrometers, not combined with other instruments : Liquid-filled, for direct reading
	9025.80	Hydrometers and similar floating instruments, thermometers, pyrometers, barometers, hygrometers and psychrometers, recording or not, and any combination of these instruments. - Other instruments

Measuring devices	9026.20	Instruments and apparatus for measuring or checking the flow, level, pressure or other variables of liquids or gases (for example, flow meters, level gauges, manometers, heat meters), excluding instruments and apparatus of heading 90.14, 90.15, 90.28 or 90.32. - For measuring or checking pressure
Dental amalgam	2843.90	Colloidal precious metals; inorganic or organic compounds of precious metals, whether or not chemically defined; amalgams of precious metals. - Other compounds; amalgams
	3006.40	- Dental cements and other dental fillings; bone reconstruction cements

MIAs of project participating countries



Mercury added products in the MIAs

	Minamata Initial Assessments (MIAs)								
	Indonesia (2022)	Malaysia (2021)	Maldives (2019)	Mongolia (2019)	Nepal (2019)	Palau (2024)	Philippines (2019)	Sri Lanka (2019)	Vietnam (2016)
Toolkit Inventory Level	2	1	1	2	1	2	2	1	1
Thermometers	S	S	Co	UN	Co	N	S	Co	UN/Co
Electrical switches and relays with mercury	P	N	N	P	P	P	P	N	P
Light sources	S	N	Co	UN	Co	S	S	Co	S
Batteries	S	N	Co	UN	N	N	Co/UN	Co	N
Biocides and pesticides	N		N	N	N	N	S		N
Paints	N	N	Co	N	N	N	N	N	N
Cosmetics	S	N	Co	N	N	N	UN	N	N
Medical blood pressure gauages	S	S	Co	N	Co	N	S	N	N

UN - Data from UN Comtrade; Co – Customs data (10-digit HS codes); S - National data (survey, associations, departments, own calculation, market observation, etc.); P – Population (Inventory default method); N – No source presence (or) unknown (or) No data

HS codes identified in the MIAs of project participating countries

Malaysia

Customs code	Description
90251100	Mercury containing thermometers
90189090	Mercury containing sphygmomanometers

Vietnam

Customs code	Description
952011	Thermometers
853931	Poles Fluorescent
853939	Poles Fluorescent
853932	Other light bulbs
32091050	Special Paints coating antifouling hull
32082040	Special Paints coating antifouling hull
320820	Paints
320919	Paints
33049930	Skin lightening cream
90189090	Sphygmomanometer

Mongolia

Customs code	Description
902511	Thermometers with mercury
320420	Fluorescent tubes (double end)
853931	Compact fluorescent lamp (CFL single end)
853932	Metal halide lamps
853949	UV light for training
8506	All cells and batteries, except 850640 and 850660 codes
850640	Silver oxide
850660	Air-zinc

Nepal

Customs code	Description
27011100	Anthracite, not agglomerated
27011200	Bituminous coal, not agglomerated
27011900	Other coal, not agglomerated, nes
27131100	Petroleum coke, not calcined
27101950	Fuel Oil (Furnace Oil)
27071000	Benzol (benzene)
27072000	Toluol (toluene)
27073000	Xylol (xylenes)

HS codes identified in the MIAs of project participating countries

Maldives

Customs code	Description
85064000	Silver oxide primary cells or batteries
85068000	Other primary cells/batteries
8506800010	Button cell Watch Battery
853931000	Discharge lamps, fluorescent, hot cathode with;/without double ended cap (Nmb)
8539410000	Arc-lamps (Nmb)
85393200	Mercury or sodium vapour lamps, metal halide lamps (Nmb)
85393910	Low energy consumption lamps/light bulb (Nmb)
9025111000	Clinical thermometer containing mercury (Nmb)
9025111000	Clinical thermometer mercury free (Nmb)
9025119010	Thermometer (liquid filled not Hg) (Nmb)
9025191000	Thermometer (medical use) containing Hg (Nmb)
9025199010	Thermometer others containing (Hg) (Nmb)
9025199010	Thermometer others (non Hg) (Nmb)
9025199010	Glass thermometers Hg free for laboratories (Nmb)
90258020	Barometers/manometers containing mercury
90258020	Barometers/manometers mercury free
90258080	Hydrometers, pyrometers, hygrometers, etc containing mercury and combination (excluding 90251120 and 90251180)
90258040	Hydrometers, pyrometers, hygrometers, etc, mercury free and combination (excluding 90251920)
90258020	Sphygmomanometers mercury free (medical blood pressure gauges)
90258020	Sphygmomanometers containing mercury (medical blood pressure gauges)
90321000	Thermostats mercury free

Sri Lanka

Customs code	Description
952011	Thermometers and pyrometers not combined with other instruments (liquid-filled for direct reading)
90251100	Thermometers and pyrometers not combined with other instruments (liquid-filled for direct reading)
85393110	Energy efficient alternating current (AC) CFL
85393120	12 V, direct current (DC) fluorescent lamps (straight tubes as well as compact types)
85393190	Other fluorescent
853932	Mercury or sodium vapour lamps; metal halide lamps
850630	Mercuric oxide
850640	Silver oxide
850660	Air-zinc
850680	Other
85481020	Spent primary cells, spent primary batteries and spent electric accumulators
902620	Instruments and apparatus for measuring or checking pressure

Different HS codes for similar products

Minamata Secretariat		Vietnam MIA		Malaysia MIA		Maldives MIA	
Customs code	Description	Customs code	Description	Customs code	Description	Customs code	Description
901890	Other instruments and appliances including sphygmomanometers	90189090	Sphygmomanometer	90189090	Mercury containing Sphygmomanometers	90258020	Sphygmomanometers mercury free (medical blood pressure gauges)
						90258020	Sphygmomanometers containing mercury (medical blood pressure gauges)

The tariff codes used by Maldives deviate from the codes used by Vietnam and Malaysia.

Customs codes of more than six digits - Example of Uruguay

- Minamata focal point is the Environment Directorate (DINAMA).
- DINAMA recognized the need for better information on mercury-added products.
- DINAMA convened a Working Group called “Proyecto Mercurio”:
 - Ministry of Public Health
 - Technological Laboratory of Uruguay
 - National Directorate of Customs

Customs codes of more than six digits - Example of Uruguay

- The Working Group was asked to identify new statistical codes for:
 - Clinical thermometers
 - Blood pressure measuring devices
- New 10-digit codes for these devices were submitted to the Ministry of Economy and Finance
- All new codes more than 6 digits were defined by national authorities to identify mercury added product and non mercury added products in Uruguay.

Customs codes of more than six digits - Example of Uruguay

Mercosur Common Nomenclature	Changes to the National Tariff 2017	Description
90189092		Devices for measuring blood pressure
	9018.90.92.00	Devices for measuring blood pressure
	9018.90.92.10	Containing mercury
	9018.90.92.90	Others
90251110		Clinical thermometers
	9025.11.10.00	Clinical thermometers
	9025.11.10.10	Containing mercury
	9025.11.10.90	Others

Developing statistical codes of more than six digits for identifying and differentiating mercury-added from non-mercury-added products, allows **national governments and regional entities** on their own initiative to add two or more digits to an existing 6-digit HS code (typically for a total of eight to ten digits).

Proposed customs codes of more than six digits

Switches and relays

Existing code	Proposed statistical codes	Description
		Isolating switches and make-and-break switches, for a voltage exceeding 1,000 volts
8535.30.01		Make-and-break switches
	8535.30.01.10	With added mercury
	8535.30.01.90	Others
8535.30.13		Switches for rated current less than or equal to 1,600 amps, vacuum cut-off without actuating device (vacuum bottles or ampoules)
	8535.30.13.10	With added mercury
	8535.30.13.90	Others
8535.30.18		Disconnectors and switches for rated current less than or equal to 1,600 amps and others with automatic actuation device except for contacts immersed in liquid medium
	8535.30.18.10	With added mercury
	8535.30.18.90	Others
8535.30.19		Other disconnectors and switches for rated current less than or equal to 1,600 amps
	8535.30.90.10	With added mercury
	8535.30.90.90	Others
8535.30.27		Switches for rated current greater than 1,600 amps and others with non-automatic actuation device
	8535.30.27.10	With added mercury
	8535.30.27.90	Others
8535.30.28		Switches for rated current greater than 1,600 amps and others with automatic actuation device except for contacts immersed in liquid medium
	8535.30.28.10	With added mercury
	8535.30.28.90	Others

Batteries

Existing code	Proposed statistical codes	Description
8506.10.10		Alkaline manganese dioxide primary cells
	8506.10.10.10	With added mercury
	8506.10.10.90	Others
8506.10.20		(Other) manganese dioxide primary cells
	8506.10.20.10	With added mercury
	8506.10.20.90	Others
8506.10.30		Manganese dioxide batteries
	8506.10.30.10	With added mercury
	8506.10.30.90	Others
8506.30.00		Mercuric oxide batteries
	8506.30.00.00	Mercuric oxide primary cells and batteries (excluding spent)
8506.40.10		Silver oxide primary cells with external volume less than or equal to 300 cm ³
	8506.40.10.10	With added mercury
	8506.40.10.11	Button batteries with mercury content less than 2% by weight
	8506.40.10.90	Others
8506.40.90		(Other) silver oxide primary cells
	8506.40.90.10	With added mercury
	8506.40.90.90	Others
8506.60.10		Air-zinc primary cells (with external volume less than or equal to 300 cm ³)
	8506.60.10.10	With added mercury
	8506.60.10.11	Button batteries with mercury content less than 2% by weight
	8506.60.10.90	Others
8506.60.90		(Other) air-zinc batteries
	8506.60.90.10	With added mercury
	8506.60.90.90	Others
8506.80.01		Other primary cells and batteries
	8506.80.10.10	With added mercury
	8506.80.10.90	Others

Proposed customs codes of more than six digits

Linear fluorescent lamps

Existing code	Proposed statistical codes	Description
		Fluorescent, hot cathode discharge lamps, other than ultraviolet lamps
8539.31.00.10		Linear fluorescent lamps (LFLs) for general lighting purposes
	8539.31.00.11	Triband phosphor less than 60 watts with a mercury content not exceeding 5 mg per lamp
	8539.31.00.12	Halophosphate phosphor less than 40 watts with a mercury content not exceeding 10 mg per lamp
8539.31.00.90		Other

Compact fluorescent lamps

Existing code	Proposed statistical codes	Description
8539.31.00		Discharge lamps, fluorescent and hot cathode
8539.31.10		Compact fluorescent lamps (CFLs) for general lighting purposes
	8539.31.10.10	CFLs less than 30 watts with a mercury content not exceeding 5 mg per lamp
	8539.31.10.90	Other CFLs

High-pressure mercury vapour lamps

Existing code	Proposed statistical codes	Description
8539.32.00		Mercury or sodium vapour lamps; metal halide lamps
	8539.32.00.10	High-pressure mercury vapour lamps for general lighting purposes

Pesticides, biocides and topical antiseptics

Existing code	Proposed statistical codes	Description
		Other medicaments consisting of mixed or unmixed products for therapeutic or prophylactic uses, for retail sale
3004.90.1000		Containing antigens or hyaluronic acid or its sodium salt
	3004.90.2000	[Topical antiseptics] containing mercury compounds
		Insecticides, rodenticides, fungicides, herbicides, anti-sprouting products and plant growth regulators, disinfectants and similar products
3808.50.01		Goods containing a range of substances as specified in Subheading Note 1 to Chapter 38, of which one is mercury compounds
3808.50.10		Specified goods containing any aromatic or modified aromatic pesticide
	3808.50.10.10	Containing mercury compounds
	3808.50.10.90	Not containing mercury compounds
3808.50.50		Other pesticides
	3808.50.50.10	Containing mercury compounds
	3808.50.50.90	Not containing mercury compounds
3808.91.00		Insecticides
	3808.91.00.10	Containing mercury compounds
	3808.91.00.90	Not containing mercury compounds
3808.92.00		Fungicides
	3808.92.00.10	Containing mercury compounds
	3808.92.00.90	Not containing mercury compounds
3808.93.00		Herbicides, anti-sprouting products and plant-growth regulators
	3808.93.00.10	Containing mercury compounds
	3808.93.00.90	Not containing mercury compounds
3808.99.00		Other
	3808.99.00.10	Containing mercury compounds
	3808.99.00.90	Not containing mercury compounds

Proposed customs codes of more than six digits

Cosmetics

Existing code	Proposed statistical codes	Description
3304.10.01		Lip make-up preparations
	3304.10.01.10	With mercury content less than or equal to 1 ppm
	3304.10.01.20	With mercury content more than 1 ppm
3304.20.01		Eye make-up preparations
	3304.20.01.10	With mercury content less than or equal to 1 ppm
	3304.20.01.20	With mercury content more than 1 ppm and mercury is used as a preservative
	3304.20.01.30	With mercury content more than 1 ppm and mercury is not used as a preservative
3304.30.00		Manicure or pedicure preparations
	3304.30.00.10	With mercury content less than or equal to 1 ppm
	3304.30.00.20	With mercury content more than 1 ppm
3304.90.00		Other
	3304.90.00.10	With mercury content less than or equal to 1 ppm
	3304.90.00.20	With mercury content more than 1 ppm
3304.91.01		Powders, including compacts
	3304.91.01.10	With mercury content less than or equal to 1 ppm
	3304.91.01.20	With mercury content more than 1 ppm
3304.99.01		Skin creams
	3304.99.01.10	With mercury content less than or equal to 1 ppm
	3304.99.01.20	With mercury content more than 1 ppm
3304.99.99		Other
	3304.99.99.10	With mercury content less than or equal to 1 ppm
	3304.99.99.20	With mercury content more than 1 ppm

		Soap and organic surface-active products and preparations, in the form of bars, cakes, moulded pieces or shapes, and paper, wadding, felt and nonwovens, impregnated, coated or covered with soap or detergent
		For toilet use (including medicated products)
3401.11.01		Soaps for toilet use (incl. medicated)
	3401.11.01.10	With mercury content less than or equal to 1 ppm
	3401.11.01.20	With mercury content more than 1 ppm
3401.19.00		Other
	3401.19.00.10	With mercury content less than or equal to 1 ppm
	3401.19.00.20	With mercury content more than 1 ppm
3401.20.01		Soap in other forms
	3401.20.01.10	With mercury content less than or equal to 1 ppm
	3401.20.01.20	With mercury content more than 1 ppm
3401.30.01		Organic surface-active products and preparations for washing the skin, in the form of liquid or cream and put up for retail sale, whether or not containing soap
	3401.30.01.10	With mercury content less than or equal to 1 ppm
	3401.30.01.20	With mercury content more than 1 ppm

Thank you

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Overview

- Objectives
- Current HS codes situation
- HS codes for products that may be mercury-added products
- HS codes identified in the MIAs
- HS codes more than 6 digits (Example from Uruguay)