



TRAFFICKERS LEAVE NO STONE UNTURNUED

What the largest exposed mercury smuggling operation tells us about gold, the shortcomings of the Minamata Convention on Mercury, and the convergence of crimes in Latin America.

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EXECUTIVE SUMMARY

An unprecedented investigation by the Environmental Investigation Agency (EIA), which led to one of the largest reported seizures of mercury in the world and the largest by an Amazonian country, exposes large scale mercury trafficking from Mexico to Bolivia, Colombia, and Peru in violation of national laws and the Minamata Convention on Mercury.

More than seven years after the Convention took effect in Mexico, primary mercury mining production is spinning out of control, with bursts of activity driven by mercury prices, increased violence, and an alleged recent takeover of productive mines by a drug cartel. According to EIA's findings, the traffickers exposed in this report are responsible for the largest illegal flows of mercury ever documented, conservatively amounting to 200 tons of mercury smuggled from the mercury mines in Mexico (state of Queretaro) to the gold mines in Bolivia, Colombia, and Peru between April 2019 and June 2025. According to traffickers, gold miners' demand for mercury has driven the sophisticated operation and made it profitable.

Between April 2019 and June 2025, EIA conservatively estimates that a minimum of US\$8 billion worth of illegal gold has been produced through the use of the trafficked mercury exposed in this report.

Mercury is one of the ten most deadly chemical substances in the world, one that, once extracted from the earth and refined, is nearly indestructible. Its profound and growing impact on human lives, human rights, and ecosystems has been described by the UN Special Rapporteur on toxics and human rights who alerted the UN General Assembly.

The vast majority of artisanal and small-scale gold miners in South America, often illegal, rely on the daily use of mercury. As one of them explained to EIA investigators, "There is no gold without mercury." Mercury is used by artisanal and small-scale gold miners to facilitate the separation and capture of gold particles from sand and other substrate from which the precious metal is extracted. The gold is subsequently separated from the mercury by a burning process during which the mercury evaporates. In the process, mercury is released by gold miners in the air, in the water, and/or in the soil.

Artisanal and small-scale gold mining (ASGM) is the single largest source of mercury pollution globally, accounting for about 40 percent of all anthropogenic mercury emissions into the atmosphere. Communities in South America, particularly those in the Amazon, that have suffered from the spread of illegal gold mining have been the first victims of mercury contamination and the destruction of their forests and rivers.

High gold prices, which have spurred the expansion of illegal ASGM into the rainforests of South America and in particular the Amazon, are driving skyrocketing prices paid by miners to mercury traffickers and leading to the prospect of very quick return on investment for smuggling operations. EIA's findings indicate an average difference of at least 400 percent in the price paid for mercury at the gold mines in Colombia and Peru compared to Mexico (based on data gathered from February 2023 to June 2025).

As of May 2025, sources from the Queretaro mines told investigators that a new "mercury fever" was hitting the region since the beginning of 2025, triggered by the record high prices (US\$330 per kilogram of mercury) offered by mercury traffickers, as a consequence of skyrocketing gold prices.

The profits from the illegal trade in mercury and gold, according to EIA's research, are supporting armed groups in Colombia and Mexico, and fueling some of the most destructive Amazonian gold rush in Madre de Dios, Peru. The trade and use of primary mercury for gold production is a violation of the Minamata Convention.

EIA's findings shed light on the current shortcoming of the Minamata Convention and its implementation in Mexico, which in practice allows mercury mining for a "grace period" that extends until 2032. While reports by Mexico to the Convention appear to indicate a phase-out of the production under control, EIA's research supports a different conclusion. Mercury production and smuggling from Mexico remains considerable. The traffickers identified in this report alone have on average smuggled 30 tons of primary mercury annually from Mexico from 2019 to 2024.

Investigators also witnessed armed individuals and built fortifications on the access road to the Cristo Vive, La Fe, El Mono, and La Peña mines, including gates, observation towers adorned with cameras and barbed wire, seemingly further evidence of the alleged takeover by the Mexican organized crime syndicate named Jalisco New Generation Cartel, a group frequently recognized as the most dangerous criminal organization in Mexico.

As traffickers explained to EIA investigators, the artisanal mercury mining sector in Mexico is both highly

resilient and elastic depending on the price paid to producers. When prices are low, mercury production remains dormant, miners stop going to the mines and look for more lucrative jobs. This temporary drawdown can create the false impression that the sector is "dead" and production is phasing-down. As soon as the price paid to producers increases, workers go back to the mercury mines, which are almost instantly reactivated.

The gold-mercury-drug trifecta trafficking is under consolidation across the continent. Investigative results are clear: until mercury mines are no longer in operation, traffickers will leave no stone unturned to smuggle the metal. It is urgent and vital to phase out the production of mercury, which is taking lives at both ends of its toxic supply chain.

Mercury should be treated as what it is: a highly toxic catalyst of convergent crimes including human rights violations, arms trafficking, drug trafficking, and illegal natural resource extraction. Allowing the continued production of mercury in Mexico until 2032 - with its attendant deadly effects on natural ecosystems and people - will in practice create deadly lasting effects for generations in Mexico and across Latin America, including Bolivia, Colombia, and Peru.

EIA recommends:

- **Immediate actions by Mexican authorities to regain control of mercury mine territories in Querétaro and investigate the trafficking network exposed in the report;**
- **Accelerated closure of the mercury mines in Mexico, with an effective phase-out achieved by the end of 2025, accompanied by effective and just socio-economic transition of the historic mining communities;**
- **Increased strategic collaboration among Latin America authorities focused on intelligence gathering and exchanging to combat mercury smuggling, leveraging Artificial Intelligence-powered trade monitoring;**
- **Leveraging the 6th Conference of the Parties in 2025, amend the Minamata Convention on Mercury in order to address salient gaps and shortcomings including removing ASGM as "allowable use", ban the international trade of all mercury to prevent its diversion to ASGM, and drastically shorten the grace period given to primary mercury extraction around the world.**