

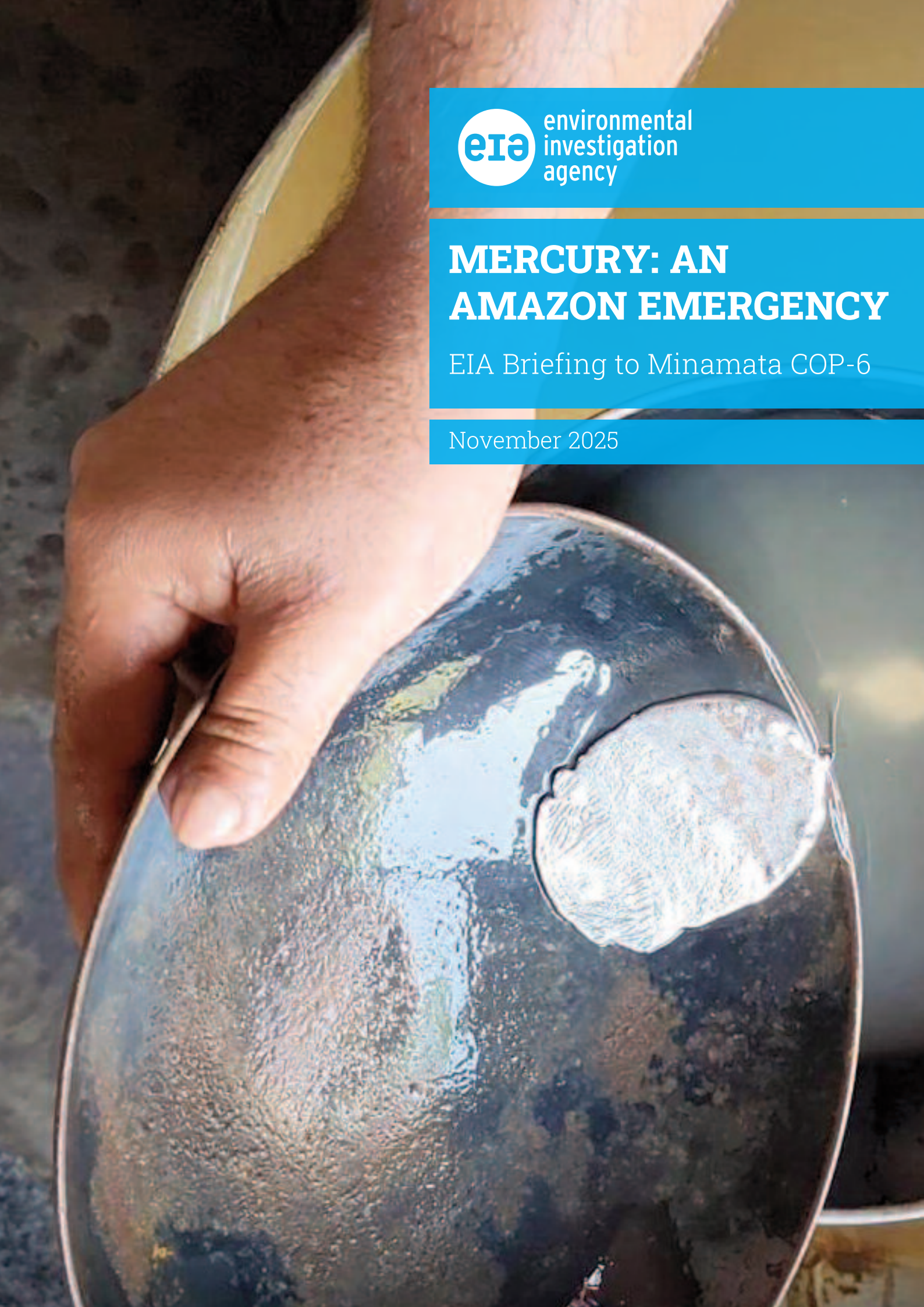


environmental
investigation
agency

MERCURY: AN AMAZON EMERGENCY

EIA Briefing to Minamata COP-6

November 2025





Source: Alejandro Saldivar

ABOUT EIA

We investigate and campaign against environmental crime and abuse. For over three decades, EIA has exposed transnational wildlife crime with a focus on elephants and rhinos, and forest crimes such as illegal logging and deforestation for agricultural commodities. We reduce the impact of climate change by campaigning to eliminate powerful greenhouse gases and improve energy efficiency in the cooling sector, and exposing related illicit trade. We use our findings to campaign for new legislation, improved governance, and more effective enforcement.

© Environmental Investigation Agency

Design: www.designsolutions.me.uk

Front cover: Gold-mercury amalgamate in the hand of an illegal miner in the Amazon. © EIA

EIA US

PO Box 53343
Washington DC 20009
USA

T: +1 202 483-6621

E: info@eia-global.org
eia.org

EIA UK

62-63 Upper Street,
London N1 0NY
UK

T: +44 (0) 20 7354 7960

E: ukinfo@eia-international.org
eia-international.org

CONTENTS

Executive Summary	3
Mercury Contamination: The Amazon at Its Worst	4
At COP-6: Opportunities To Address the Amazon's Mercury Crisis	4
Beyond COP-6: Avenues for Concerted Actions and Impacts	5
Toward COP-7: The Accelerated Closure of Mercury Mines and the Ban of Mercury in ASGM	7
References	8



EXECUTIVE SUMMARY

The Parties' work under the Minamata Convention on Mercury has led to positive and encouraging results in the phase-out of mercury-added products, strengthened capacity for mercury monitoring, inventory, and improved national reporting.

Meanwhile, criminal organizations involved in drug, weapons, and human trafficking have taken control of major international and domestic flows of mercury that feed the expansion of illegal gold mining across the Amazon. Over 400 tons of mercury are estimated to enter the Amazon Basin annually—mainly through illicit trade from primary mines and re-exports via international trading hubs. This represents one of the world's largest uncontrolled releases of mercury into the environment.

According to EIA's analysis, the current COP-6 agenda and proposed decisions do not sufficiently reflect or address the urgent needs of Indigenous Peoples and local communities, the escalating illegal flow of mercury, and its underlying causes. The scale of this crisis is now comparable to global emissions and release of mercury from all industrial sectors combined, underscoring the urgency for Parties to act beyond compliance and toward enforcement coordination.

EIA recommends:

1. Create an Illegal Mercury Trade Intersessional Working Group in order to facilitate information sharing regarding illegal mercury flows and the lessons learned from combating national and transnational criminal networks;
2. Enhance Parties' collective knowledge and technical know-how concerning effective mercury mine closure through a Secretariat-led monitoring of a pilot mercury mine closure project in Mexico;
3. Facilitate greater transparency, accountability, and traceability through the digitization of written-consent procedures for mercury imports and making it publicly available via an online database;
4. Prioritize and accelerate the phase-out of mercury mining at the global level - ideally by no later than December 2027 for Mexican mercury mines; and
5. Remove so-called artisanal and small-scale gold mining (ASGM) from the list of allowable uses for mercury under the Convention.

MERCURY CONTAMINATION: THE AMAZON AT ITS WORST

Mercury contamination affecting Indigenous Peoples and local communities is at its worst in the Amazon.¹ Over the last two decades, mercury pollution along rivers has intensified, affecting major tributaries and resulting in high levels of mercury in water, sediment, aquatic life, and human populations.² Scientific monitoring shows that mercury concentrations far exceed safe thresholds in some areas, with predatory fish and river dolphins heavily contaminated, and Indigenous communities facing dangerous levels of exposure due to their reliance on riverine food sources.³ The health impacts are profound, with chronic mercury exposure documented among Indigenous Peoples and local communities resulting in impaired neurological development, immune dysfunction, and threats to food security and biodiversity.⁴

Informal and illegal gold mining now accounts for the vast majority of mercury emissions into Amazonian waterways.⁵ Every day across the region, thousands of miners mix mercury with gold-bearing sediments to form an amalgam, which they subsequently heat to vaporize the mercury and extract the gold.⁶ This process, while rudimentary, is central to illegal gold mining across the region and is the main driver of mercury pollution in the Amazon.

Illegal gold mining also drives deforestation, which mobilizes naturally occurring soil mercury into river systems, amplifying contamination even in areas without active mining.⁷ The cumulative deforestation and climate footprint from gold mining in the Amazon is accelerating and has reached over 2 million hectares by 2024, an increase of over 50% in the past six years.⁸ A third of the impact is located in protected areas and Indigenous territories, including that of the Yanomami, Mundurucu, and Kayapó people.

In recent years, hundreds of tons of mercury have flowed into the Amazon, most of it smuggled.⁹ The convergence of mercury and gold trafficking has effectively created a transnational illicit supply chain comparable in value and level of organization to narcotics. Criminal organizations including drug cartels, armed groups, and militias control many of the trafficking routes.¹⁰ Mercury trade in the Amazon has emerged as a catalyst of convergent crime with connections to drug, arms, and human trafficking, as well as with money laundering.¹¹ The nexus between mercury trafficking and political power runs deep. For example, in Peru, senior customs officials involved in the largest seizure of mercury ever reported in an Amazon country (July 2025), were suddenly removed from their positions weeks later.¹²

According to EIA investigations, the vast majority of the mercury flowing into the Amazon is primary mercury—that is, mercury extracted directly from geological deposits as opposed to mercury recovered as a by-product or recycled from other industrial processes. The rapid expansion of illegal gold mining in the Amazon, fueled by mercury trafficking from primary mines, is in breach of Article 3 of the Convention—the article governing mercury supply sources and trade, which demands an urgent and coordinated response from the Parties.

AT COP-6: OPPORTUNITIES TO ADDRESS THE AMAZON'S MERCURY CRISIS

Mercury supply sources and trade

Article 3 of the Convention—intended to limit primary mercury supply—has become the least enforced provision of the Convention in practice. Current reporting reveals serious under-compliance, particularly from countries hosting or indirectly facilitating primary mercury production. Under paragraph 4 of Decision MC-5/2, Parties were invited to share information with the Secretariat on implementing Article 3 and the Bali Declaration by March 2025. Eight Parties responded: Burkina Faso, Canada, Indonesia, Japan, Peru, the Philippines, Senegal, and Togo.¹³ Given multiple reports that document significant illicit mercury trade flows,¹⁴ EIA notes with concern that other countries have not shared information—particularly Mexico and Amazonian countries such as Brazil, Bolivia, Colombia, Ecuador, France (with its overseas territory of French Guiana), Guyana, and Suriname.¹⁵

By declining to submit trade or enforcement data, these countries fall short of the transparency and cooperation principles enshrined in the Bali Declaration on Combating Illegal Trade in Mercury, which calls on Parties to “develop practical tools and notification-and information-sharing systems” and “exchange experiences and practices relating to combating illegal trade in mercury.”¹⁶ This silence undermines efforts to trace cross-border mercury flows, weakens collective enforcement, and makes it harder to monitor, intervene in, and deter illicit mercury trade that fuels pollution and health risks.

This lack of reporting is particularly concerning given the continued persistence of primary mercury mining in Mexico—often in breach of national regulations—with an estimated annual production of around 100 tons. Such production not only undermines the objectives of Article 3 of the Convention but also sustains the illegal trade that fuels gold mining across the Amazon. Strengthening information-sharing mechanisms among Parties is therefore critical to closing these gaps.

EIA recommends that Parties mandate the Secretariat to develop an open-access dashboard compiling national



Active mercury mines with colossal cinnabar tailings in the Sierra Gorda UNESCO Biosphere Reserve in Querétaro (Mexico).

trade and seizure data under Article 3 and Decision MC-5/2, modelled on the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Trade Database.¹⁷

Artisanal and small-scale gold mining

EIA welcomes the Secretariat's previous work at COP-5 and presessional documents relating to the use of mercury in ASGM and its effects on Indigenous Peoples and local communities.¹⁸ As outlined in document UNEP-MC-COP6-07-ASGM, national reporting on the implementation of Decision MC-5/7 has revealed persistent structural challenges—fragmented data, weak enforcement, ambiguity in reporting guidance and limited institutional capacity—which continue to obscure the scale of ASGM mercury use. This underscores the need to strengthen the language of the draft Decision associated with document UNEP/MC/COP.6/7 to ensure effective implementation and accountability.

It is essential that the Secretariat's efforts be effectively supported by Parties in obtaining updated and actionable information to combat the illegal trade in mercury, particularly through the development and exchange of best practices. The most affected Amazonian Parties, including Brazil, Bolivia, Colombia, and Peru, should lead by example in this regard. Expediting this process—ideally by November 2026—is critical to addressing the illicit trade in primary mercury and closing the information gaps regarding countries such as Mexico and Indonesia.

As indicated in UNEP-MC-COP6-07-ASGM, only 35 of the 51 parties that reported to the Secretariat that mercury in

ASGM was “more than insignificant”, have submitted a national action plan (NAP). In the Amazon, Brazil, Peru, and Bolivia have not yet submitted their NAPs, but have reported more than insignificant levels of ASGM. EIA strongly supports efforts to strengthen reporting measures within the Convention in regard to the implementation of Article 7 and to request updates on the strategies of Parties' NAPs.¹⁹

BEYOND COP-6: AVENUES FOR CONCERTED ACTIONS AND IMPACTS

Illegal Mercury Trade Intersessional Working Group

In accordance with our recommendations on Annex 1 MC-6/7, EIA proposes the creation, at COP-6, of an international intersessional working group focused on collecting, organizing, and discussing the illegal trade in mercury across several global regions, for instance from North America to the Amazon; and from Eurasia to Africa via the Middle East. This working group would also address Decision MC 5/7 on ASGM and the challenges Parties have faced in national reporting, particularly as per the Secretariat's requested reporting under the Decision MC 5/2 pertaining to implementation: “illegal and unreported trade across national borders; illegal transit and re-export of mercury; illegal trade for use in ASGM; discrepancy in trade data; lack of resources for control at the border and of infrastructure for seized mercury; unknown origin and importer of mercury; and illegal online trading.”²⁰ The group's first output should be a Global Mercury Trade Status Report to be presented at COP-7, mapping routes, seizures, and enforcement gaps.



Peruvian authorities identified and stopped 4 tons of Mexican mercury on its way to Bolivia.

Mercury Mine Closure Best Practice Pilot in Mexico

While the closure of mercury mines remains a Convention priority, little practical guidance or support exists to achieve it in complex socio-political settings. Establishing a pilot project on the ground as a collective learning effort should therefore be a priority. Mexico is well positioned to play this role, as national authorities—including Environment Secretary Alicia Bárcena Ibarra—have publicly recognized the urgency of addressing mercury contamination in mining areas.²¹ Preparatory work has also been done with the GEF–UNEP project in Mexico (2021–2026), which aims to map and transition the primary mercury sector, and lead to the permanent closure of mercury mines by 2032 without affecting the situation of miners and their families. According to EIA’s investigation, the project has fallen short of achieving a comprehensive phase-out or ensuring meaningful oversight.²² A pilot mercury mine closure project in Mexico would strengthen this work, carry forward new approaches, and offer a valuable, replicable model for other primary-mercury regions globally.

Digital Consent Form Study

The written-consent procedure for mercury trade under Article 3 and Annex C of the Minamata Convention remains fragmented and inconsistently applied. Gaps concerning transit routes, re-exports, and free-trade zones allow mercury to be diverted into illegal channels, while weak end-use identification, limited customs capacity, and the lack of standardized response timelines further erode transparency. Peru’s submission to the Secretariat (Decision MC-5/2, para. 9) underscores these shortcomings and the need to modernize the process.²³ Building on that proposal, EIA urges Parties at COP-6 to develop a standardized, digitized written-consent system with uniform disclosure requirements—including transit points and intended end uses—and unique identifiers to ensure traceability. The Secretariat should lead a Digital Consent Form Study to define its technical, legal, and logistical design. Such a platform, linking customs, environmental, and trade authorities, would strengthen implementation of Decision MC-5/2 and Annex C, curb mercury diversion, and enhance real-time cooperation among Parties.

TOWARD COP-7: THE ACCELERATED CLOSURE OF MERCURY MINES AND THE BAN OF MERCURY IN ASGM

Looking ahead to COP-7, Parties must confront unresolved contradictions at the heart of the Convention's implementation and design if its objectives are to be realized. Central among these is the 15-year grace period that allows existing primary mercury mines to continue operating—until, for instance, 2032 in the case of Mexico. As EIA's investigation shows, with much of Mexico's primary mercury entering illicit supply chains that feed ASGM across the Amazon, extending primary mercury production for another seven years effectively legitimizes a major source of global contamination in breach of the Convention. Allowing this grace period to stand risks undermining the credibility of the Convention and the commitments made under the Bali Declaration on Combating Illegal Trade in Mercury. In addition, EIA advocates for building on the above suggested best practice pilot in Mexico, and calls for the closure of all active primary mercury mines in the country by December of 2027.

The continued classification of ASGM as an “allowable use” of mercury under Article 2(k) of the Convention further compounds this problem. Originally conceived as a temporary provision to accommodate developing economies dependent on ASGM, this measure has become a persistent loophole enabling ongoing mercury trade and use. Experience from other international control regimes suggests that prohibitions, far from weakening oversight, empower it. By removing ASGM from the list of allowable uses, Parties would gain a clear legal mandate to interdict mercury shipments linked to illegal mining, mobilize customs and financial intelligence units, and integrate mercury trafficking into broader anti-smuggling and organized-crime frameworks. This would align mercury enforcement with existing gold-trade and money-laundering controls, enabling coordinated prosecution of both commodities within the same criminal supply chain.²⁴

While some within the international policy community caution that a full mercury ban could drive trade underground, EIA's decades of work on securing and enforcing an international ivory trade ban provide a counter-example that is difficult to ignore (see box): from the moment the ivory ban was instituted, governments gained access to legal and institutional enforcement tools—such as customs protocols, seizure powers, forensic traceability, and criminal penalties—that were previously unavailable.²⁵ This approach directly operationalizes the Bali Declaration's call for ‘practical tools’ to combat illegal trade and aligns with the Minamata Convention's Article 7 obligations.



“No Trade, No Killing” Lessons From the Ivory Trade Ban

Some in international policy circles warn that a blanket ban risks driving trade underground. But history suggests otherwise. In the lead-up to CITES's 1989 moratorium on international ivory trade, EIA (then newly founded) published undercover investigations exposing corruption, laundering via stockpile “amnesties,” and the complicity of state parties.²⁶ Many parties initially resisted or sought loopholes, but once the ban was adopted, it unlocked legal tools previously unavailable — customs protocols, seizure authority, forensic tracing, and criminal penalties — to suppress ivory trafficking. Over time, poaching rates declined, ivory prices dropped, and enforcement cooperation strengthened; even if illicit markets persisted, the legal ban shifted power toward regulators, constrained criminal networks, and created a foundation for compliance over time. Illegal markets persisted largely for two reasons that are worth understanding. The CITES one-off sales in 1999 and 2008 stimulated demand and increased poaching and ivory trafficking. Major consumer countries (including China) failed to close their domestic markets. China has for instance closed its ivory market in 2018, which has had a positive effect on reducing poaching and illegal trade.²⁷

REFERENCES

1. Orellana, M., "Mercury, small-scale gold mining and human rights Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes" (United Nations General Assembly, Human Rights Council, Fifty-first session 12 September–7 October 2022).
2. United Nations Environment Programme (UNEP), Global Mercury Assessment 2018 (Geneva: UN Environment Programme, 2019).
3. Damasio, K. "Researchers Find High Levels of Mercury in Amazon's Madeira River Water & Fish," Mongabay, November 27, 2024; NBC News, "Endangered Pink River Dolphins Face Rising Mercury Threat in Amazon," NBC News (Source: AP News), September 16, 2025.
4. Rebouças, R. H., et al., "Long-Term Environmental Methylmercury Exposure Is Associated with Neurological Impact in the Yanomami Indigenous Population," *Toxics* 12, no.3 (2024); World Bank, "Regional Collaboration to Address the Impacts of Mercury Pollution in the Amazon," October 27, 2023.
5. Cornwall, W., "Illegal gold mines flood Amazon forests with toxic mercury," *Science*, January 28, 2022; Diring, S. E., et al., "River Transport of Mercury from Artisanal and Small-Scale Gold Mining and Risks for Dietary Mercury Exposure in Madre de Dios, Peru," *Environmental Science: Processes & Impacts*, 17(2), 478–487 (2015).
6. Esdaile L. J. and J. M. Chalker, "The Mercury Problem in Artisanal and Small-Scale Gold Mining," *Chemosphere* (2018).
7. Guimarães, J. R. D. et al., "Mercury Cycling in the Amazon: Mobilization of Natural Mercury by Deforestation and Gold Mining," *Proceedings of the National Academy of Sciences* 117, no. 38 (2020): 23479–23486.
8. MAAP, "Amazon Mining Watch 2024: Cumulative Mining Deforestation Footprint," Amazon Conservation / MAAP.
9. Environmental Investigation Agency (EIA), "Traffickers Leave No Stone Unturned" (2025).
10. *Ibid.*
11. Yansura J., Money Laundering from Environmental Crime: Typologies and Trends in Countries in the Amazon Region (FACT Coalition, 2024).
12. EIA, Internal report (2025).
13. Minamata Convention on Mercury, Decision MC-5/2: Mercury Supply Sources and Trade (2023).
14. WWF, "Living Amazon Report 2022," Amazon Coordination Unit (2022); Cheng, Y., et al., Examining the inconsistency of mercury flow in post-Minamata Convention global trade concerning artisanal and small-scale gold mining activity, *Resources, Conservation and Recycling*, Volume 185, 2022; Fuse, M. et al., "Detecting Illegal Inter-country Trade of Mercury Using Discrepancies in Mirrored Trade Data", *Environmental Science & Technology* Vol 56/Issue 19; Ramirez, M. F., "The Poisonous Mercury Trade," *InSight Crime*, May 2, 2024.
15. Minamata Convention on Mercury, Decision MC-5/2: Mercury Supply Sources and Trade (2023).
16. Bali Declaration on Combating Illegal Trade in Mercury, adopted at COP-4, March 2022.
17. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), CITES Trade Database (version 2025.1).
18. UNEP-MC-COP.6-07-ASGM; UNEP/MC/COP.6/7/Add.1; and UNEP-MC-COP.6-17-IPs-LCs.
19. UNEP-MC-COP6-07-Add1-ASGM-Draft-RIA.
20. UNEP, Artisanal and Small-Scale Gold Mining: Report by the Secretariat (UNEP/MC/COP.6/7) (Geneva: Minamata Convention on Mercury, 2025).
21. Cordero, C., "Alerta SEMARNAT por tráfico de mercurio," *Quadratin*, October 1, 2025.
22. Minamata Convention on Mercury, Implementation of Decision MC-5/2 on Mercury Supply Sources and Trade, UNEP/MC/COP.6/5, Annex 1, para. 4.
23. UNEP, Implementation of Decision MC-5/2 on Mercury Supply Sources and Trade, UNEP/MC/COP.6/5, para. 9.
24. United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species and Related Illicit Flows (Vienna: UNODC, 2024), pp. 102–109; INTERPOL, Uncovering the Risks of Mercury and Gold Supply Chains: Illicit Flows and Organized Crime Linkages (Lyon: INTERPOL Environmental Security Programme, 2023).
25. EIA, "A System of Extinction: The African Elephant Disaster" (1989).
26. EIA, "Saving Elephants from the Ivory Trade" (n.d.).
27. Shi, T., et al., "No trade, no killing - An evaluation of China's ivory ban on elephant poaching, *Biological Conservation*, Volume 313, January 2026.



EIA US

PO Box 53343
Washington DC 20009 USA
T: +1 202 483-6621
E: info@eia-global.org
eia.org

EIA UK

62-63 Upper Street,
London N1 0NY UK
T: +44 (0) 20 7354 7960
E: ukinfo@eia-international.org
eia-international.org