SUMMARY REPORT

SUB-REGIONAL CUSTOMS TRAINING TO ENHANCE MONITORING OF TRADE OF MERCURY, MERCURY COMPOUNDS AND MERCURY-ADDED SKIN LIGHTENING PRODUCTS

Workshop: 3-4 June, 2025, Colombo, Sri Lanka

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

Meeting Location: Cinnamon Life at City of Dreams, 01 Justice Akbar Mawatha, Colombo, Sri Lanka

Meeting Date: 3 - 4 June 2025

Organized by: United Nations Environment Programme (UNEP) *in collaboration with* Asian Institute of Technology (AIT), Biodiversity Research Institute (BRI), World Customs Organization (WCO), World Health Organization (WHO), and the Government of Sri Lanka as a joint initiative under the Japan-funded *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* and the Global Environment Facility (GEF) Funded Project, *Eliminating Mercury Skin Lightening Products*.

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Meeting Background

A two-day in-person sub-regional training workshop was developed to equip customs officers, environmental regulators, and law enforcement agencies with the guidance to detect and control mercury trade. Key areas of focus include regulatory compliance, risk assessment, intelligence-sharing, and forensic analysis. This activity was a joint initiative developed under two projects involving countries in the Asian region:

1. The Japan-funded *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* is implemented regionally by the United Nations Environment Programme (UNEP). The project has a special focus on the area of information exchange, awareness and education, research, development, and monitoring. A comprehensive program 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.
2. The project, *Eliminating Mercury Skin Lightening Products* which is funded by the Global Environment Facility (GEF), implemented by UNEP and co-executed by the World Health Organization (WHO) and Biodiversity Research Institute (BRI) in collaboration with the Governments of Gabon, Jamaica, and Sri Lanka. The project aims to eliminate mercury containing skin lightening products (SLPs) by supporting governments to develop or strengthen existing legislation and regulations to phase out SLPs in line with the Minamata Convention; engaging supply chain actors in an attempt to stop production, trade and distribution of SLPs; strengthening national capacities in testing and monitoring SLPs and providing training of custom agents; and raising awareness about the issue in the project countries and at the regional and global levels.

The meeting was held on Tuesday 3 and Wednesday 4 June 2025 at the Cinnamon Life at City of Dreams Hotel located in Colombo, Sri Lanka.

The meeting was organized by UNEP in collaboration with AIT, BRI, the World Customs Organization (WCO), WHO, and

the Government of Sri Lanka via the Ministry of Environment.

The workshop sought to engage regional governmental stakeholders from the Customs, environment and law enforcement divisions relevant to managing trade of potentially hazardous materials.

Opening Remarks and Introduction to the Session

The workshop was chaired by Mr. Bishal Bhari, AIT. Introductory remarks were provided by several representatives of key organizations. First, Ms. Malgorzata Stylo, UNEP, gave participants a brief introduction to the purpose of the workshop to build capacity for managing mercury trade as initiatives under both aforementioned projects and noted that these activities will further enhance the engagement amongst agencies and countries to enhance their capabilities to implement the Minamata Convention on Mercury. Ms. Anna Kobylecka from WCO then provided remarks on the pivotal role of Customs organizations in working on the frontlines to protect borders from environmentally sensitive commodities including those that contain mercury. The importance of collaboration amongst Customs agencies, and health and environmental authorities to adequately protect human health and the environment was highlighted. Dr. Guilberto Borongan, AIT, then delivered remarks that shed light on the continued challenges posed by mercury trade as its demand continues to be fuelled by its use in artisanal and small-scale gold mining (ASGM) and SLPs. The need for improved systems for monitoring such as better detection tools and up-to-date trade data as well as strengthening of institutions to face these challenges are major factors in addressing mercury trade. Representing Sri Lanka's Ministry of Environment and National Focal Point for the Minamata Convention on Mercury, Ms. Pathma Abeykoon expressed her appreciation for the workshop which serves as a tool for strengthening the collective effort to monitor and control mercury trade amongst different agencies and within the region.

Following a round of introductions from participants, Ms. Ashley Bastiansz, BRI, provided an overview of the goals of the workshop to:

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.

It was also noted that online webinars to further explore certain key topics related to mercury trade would also be hosted between May – August 2025.

Understanding the Issues Posed by Mercury, Its Trade and Needs for Implementing the Obligations under the Minamata Convention

Ms. Tahlia Ali Shah, BRI, provided an overview of the issues posed by mercury highlighting the different forms in which mercury might be found (e.g., elemental, inorganic salts, organic mercury compounds), how they may be traded for various uses, and differing impacts on the environment and human health.

It was noted that mercury compounds may be stored/produced from direct use/production sources including primary mercury mining facilities or mercury compound production facilities. Mercury compounds may also be stored/produced as byproducts or wastes at industrial processing facilities or unsecured waste disposal sites. Tracking the trade of mercury compounds can be difficult as previous reviews of Comtrade data indicated that the quantities of mercury compounds traded under Harmonised System (HS) Code 285210 did not fully reflect the types of mercury used in certain countries for various processes. Based on assessments conducted by UNEP in 2025, it was found that some mercury compounds can be produced at low enough costs to bypass trade restrictions for the purpose of extracting elemental mercury in some countries. Increasing the understanding of stakeholders in Customs, environment and other relevant agencies is essential to better implement mercury trade monitoring and its phase out.

Dr. Elena Jardan, WHO, presented on the human health impacts of mercury where the acute and chronic impacts of mercury exposure were highlighted. The route of exposure could result in vastly different symptoms that range from chronic headaches to muscular atrophy and impairments to the development of the nervous system with pregnant women and young children being the most vulnerable. Dr. Jardan highlighted the routes of exposure from use of mercury-added SLPs and the ongoing work under the project, “Eliminating Mercury Skin Lightening Products”, which will facilitate more information sharing between countries

worldwide. The key roles of health care providers in identifying the problem, informing the community and promoting the implementation of appropriate measures among other roles to address the issue was noted.

Ms. Malgorzata Stylo, UNEP, then provided an overview of the obligations under the Minamata Convention and Basel Convention concerning global mercury trade regulations. Article 3 “Mercury Supply Sources and Trade” of the Minamata Convention, along with other related articles, outlines measures for managing mercury trade. It was also noted that Parties to the Minamata Convention must only facilitate mercury trade for allowed uses or environmentally sound storage in alignment with the Convention. Following the last Conference of the Parties of the Minamata Convention, the Secretariat began compiling information on challenges faced by countries in implementing Article 3 as well as the related Bali Declaration on Combatting Illegal Trade of Mercury. The report will soon be finalised and main challenges to date include the illegal re-export of mercury, illegal transit and trade of mercury for ASGM, unknown origins of traded mercury and lack of information on enforcement responses to illegal trade. Ms. Stylo tied in other related environmental agreements such as the Basel Convention which outlines the prior informed consent (PIC) procedure needed for transboundary movement of mercury wastes, and the Rotterdam Convention which also covers PIC procedures for mercury compounds listed as pesticides. The information sources available on the Global Mercury Partnership (GMP) website were listed for further reference.

Mr. Harry Fakri from the Ministry of Environment in Indonesia gave insight into the Bali Declaration that was previously mentioned by Ms. Stylo. Mr. Fakri detailed that the Bali Declaration of 2022 was developed as a regional response following calls for regional cooperation to control illegal mercury trade. The Declaration focuses on transparency, enforcement, intelligence sharing and technical support to enhance countries’ abilities to develop tailored national action plans to combat mercury trade in the region. It was detailed that based on data received, the trade of mercury in Asia was mostly tied to ASGM demands and due to weak controls/ corruption-prone areas, mercury was traded from countries with known producers and stockpiles. Regional responses to improve monitoring and control have been taking place with joint sea patrols and seizure operations in Thailand, improved customs monitoring and enhanced ASGM monitoring in Indonesia, community-based monitoring and public education initiatives in the

Philippines, all improving the Asian region's implementation measures.

Moving forward, countries that have signed on to the Bali Declaration are encouraged to finalize national action roadmaps, establish a regional mercury trade task force and continue data sharing and capacity-building.

Country Presentations and Case Studies

To better understand national priorities, challenges and actions, national representatives provided brief presentations. Mr. Manoj Nidhi Wagle from the Department of Customs Nepal detailed that while Nepal is not yet a Party to the Minamata Convention, they have taken several measures to phase out mercury. For mercury-added products (MAPs), restrictions were in place for pesticides, medical instruments and dental amalgam, and while other products such as mercury-added SLPs were not specifically controlled, voluntary Nepal Standards have been formulated. In Nepal, the unique source of potential mercury releases exists in its use in gold plating of statues and monuments. Safer methods for gold plating have been identified as a challenge to address. Other challenges experienced included the needs for legislative and technological capacity building to develop an adequate mechanism for tracking mercury compounds, MAPs and waste.

Representing the Bureau of Customs, Philippines, Mr. Donnie Pirote Cordero noted that in the Philippines, mercury has historically been used largely for ASGM activities. Since signing on to the Minamata Convention, the Philippines took several legislative and practical actions to reduce mercury usage. Several regulations have been passed that phase out mercury dental amalgam, mercury-added medical devices and certain mercury-added SLPs. The Bureau of Customs has also conducted significant seizures of mercury. For example, 360 kilos of mercury were intercepted in 2023 after their containers were incorrectly labelled. A certain SLP found to contain mercury has also been seized, and in response the Food and Drug Administration (FDA) in the Philippines developed an advisory to prevent its use and distribution. Ms. Kobylecka asked a question about how regulations for specific product bans were developed and how they can be utilised by Customs for their risk analysis processes. Mr. Cordero responded that the FDA sent out notifications on product advisories to all key stakeholders including law enforcement and Customs agencies to prevent illegal entries. Customs then used the advisories in their risk profiling of shipments and imports for inspection.

Ms. Nafha Abbas from the Ministry of Tourism and Environment, Maldives, then briefed participants on the national situation of mercury trade. Ms. Abbas indicated that the Maldives joined the Minamata Convention in 2024 and through assessments determined that MAPs and potential transboundary pollution were the main sources of mercury in the Maldives. Currently, no HS codes for mercury are utilized which makes it difficult to track imports of mercury or MAPs and as such there are no seizure reports or export permit records to assist in quantifying the issue. The development of necessary regulations and awareness raising activities are ongoing, and the need for increased capacity building was emphasized.

Mr. Kemmapat Laohapiengsak of the Thailand Customs Department explained that mercury trade was regulated under several legislative actions. In terms of Customs, an expanded 8-digit HS code was often utilized for MAPs, however, expanded HS codes were still needed. The Customs agents use a risk management system for cargo clearance that includes the logging of declarations from traders which will then alert frontline officers of low, medium- and high- risk goods to be inspected. If goods are identified as high-risk, they are inspected either physically or via X-ray scanning to determine if they can be released or seized. Various tools and technologies including the Thai Customs Electronic Systems, K-9 drug detection etc. exist.

Mr. Noppadon Srihirun from the Pollution Control Department, Ministry of Natural Resources and Environment, Thailand also supported the national presentation by outlining the various health, industrial and environmental departments that work together with Customs to manage mercury trade from other sectors.

Representing Malaysia, Mr. Amir Afiq bin Abdullah from the Ministry of Natural Resources and Environmental Sustainability, outlined the number of agencies and frameworks that relate to the various mercury issues in Malaysia. The import, export and manufacture of several MAPs have been banned as of 2020, but mercury is still being imported for industrial use (i.e., ASGM in the region). Malaysia is both a transit and destination country for the trade and transboundary movement of mercury, and the lack of data on mercury use across sectors impacts the ability to manage it effectively. It was highlighted that enforcement agencies need stronger coordination, data sharing and technical capacity to handle mercury. Expanded HS codes are used by Malaysia Customs for tracking certain types of mercury, mercury compounds and products including dental alloys with mercury, and several initiatives

are planned or ongoing to further implementation of mercury management.

Vietnam's representative from the Ministry of Industry and Trade provided an overview of the national legislation related to the Minamata Convention. Mercury is regulated in relation to thermal-powered plants, fertilizers and MAPs. Expanded HS codes are also used for some types of mercury compounds/products though challenges in monitoring mercury trade still exist. For example, mercury trade has been found on online platforms such as Facebook Marketplace and for the purpose of ASGM. Ms. Bastiansz, BRI, sought clarification on the types of mercury found on online platforms and it was noted that they could be in relation to mercury-added SLPs or other types of MAPs or compounds.

A case study was jointly presented by Ms. Dyah Paramita from the Center for Regulation Policy and Governance (CRPG) - a non-profit institution based in Indonesia- and Dr. Ratih Andrawina Suminar, Attorney General's Office, Indonesia. Ms. Paramita detailed Indonesia's experience in drafting guidelines for the handling of seized mercury and cinnabar under a funded initiative from 2019 to early 2025. Under the initiative, CRPG collected and analyzed over 100 court cases involving mercury used in ASGM, trade and cinnabar trade/refining. This illuminated several gaps in managing mercury that needed to be addressed for a more streamlined approach. For example, the units used to measure mercury in the court cases were often vague (i.e., "bottles", "tubes" or "boxes" were used to describe the mercury confiscated). The directives given for handling the confiscated mercury also differed. This analysis of verdicts enabled further work with the Attorney General's Office to identify challenges and draft a guideline for public prosecutors on handling confiscated/seized mercury.

Dr. Suminar then further detailed that since mercury exports were banned by the European Union (EU) and the United States of America in 2015, Indonesia became one of the world's largest mercury producers and exporters, and consequently several cases of illegal mercury circulation and trade have occurred. The key role of the Prosecutor's Office was highlighted as they function to conduct investigations and carry out security measures amongst other relevant roles. Dr. Suminar also detailed the draft guidelines for handling confiscated/seized mercury including the risk analysis checklist to be conducted by officers, as well as safety handling procedures and sound storage. The judicial process for prosecution and all other considerations for handling confiscations were also shared in the presentation.

Regarding the presentation for Sri Lanka, it was identified that mercury trade was used on a small scale for jewellery manufacturing, and it has been reduced for dental amalgam and in medical devices but may still be used for Ayurvedic and homeopathic medicine preparations. Through the Consumer Affairs Authority (CAA), raids were conducted on retailers selling body lotions and SLPs, seizing products with over 30,000 times the permissible limit, 1 part per million (ppm). Undeclared cosmetics have been found to be imported. While some detailed HS Codes have been used, new codes are recommended to track the exact types of products being traded. It was clarified that most cosmetics seized by the CAA were imported but some may also be manufactured locally.

To provide further context on Sri Lanka's lessons learnt from their participation in the ongoing *Eliminating Mercury Skin Lightening Products* project, Ms. Chalani Rubesinghe, National Project Coordinator for Sri Lanka - WHO Sri Lanka Office, presented on the benefits in promoting close coordination amongst agencies such as Customs, environmental agencies, national labs and legislative branches.

Several agencies have key roles in regulating importers, tracking products and regularly testing imported products. To further enhance effective implementation, there is a need for research-based decision-making and referencing systems to acknowledge the products breaching standards, methods to ensure export product quality and improvements to resource mobilization.

Strengthening Enforcement, Compliance, Cross-agency Coordination and Collaboration

Ms. Kobylecka, WCO, provided details on the articles of the Minamata Convention and other related multilateral environmental agreements relevant to mercury trade management and the role of Customs. A list of the consent forms developed for use when importing or exporting mercury and mercury compounds under the Minamata Convention was highlighted and the importance of inter-agency communication with Customs to enhance implementation of other articles under the Convention related to preventing trade of MAPs and managing the trade of mercury waste under the Basel Convention were noted. Ms. Kobylecka highlighted relevant HS codes related to mercury (e.g., "HS 280540- Mercury" and "HS 85391- Lamps…"), and touched on the possibility of expanding the codes beyond 6-digits to provide further specifications as

some regions/countries have begun to do so.

Ms. Kobylecka noted that based on the country presentations and case studies delivered earlier, the operational best practices for Customs agencies were identified as document verification and controls, risk management and targeting, effective inter-agency coordination and training and awareness among others.

Regarding Ms. Kobylecka's overview of the Minamata Convention provisions, a representative from Nepal enquired as to whether the mercury used in their gold plating of religious and historical monuments would have to be phased out or if a special exemption request would have to be sought once Nepal becomes a Party to the Minamata Convention. It was noted that this would be for the Ministry of Environment to decide and provide guidance for Customs agencies. Ms. Ali Shah, BRI, added that under the Minamata Convention, the use of mercury in religious and cultural artefacts/practices is exempted from phase-out actions. The import of mercury in certain quantities should still be notified under Article 3 guidelines. These discussions closed off the first day of the workshop.

National or Regional HS Code Development

The first presentation of the second workshop day was provided by UNEP Consultant, Mr. Kyaw Nyunt Maung, who detailed how international HS codes that may be approximately six digits long can then be further subdivided into eight to ten digits to reflect nationally or regionally developed tariff code expansions. A case study of how this was done in Uruguay was provided in his presentation.

Measures to Enhance Monitoring Capacities for Mercury-Added Products such as Skin Lightening Products (SLPs)

To review the experiences in handling MAPs, Ms. Elena Lymberidi-Settimo from the European Environmental Bureau (EEB)/Zero Mercury Working Group (ZMWG) noted that MAPs reflected approximately 30% of the demand for mercury based on previous studies. While work with manufacturers, traders and countries has greatly reduced the demand for mercury in products in recent years, its use in cosmetics such as SLPs continues to persist as a major issue worldwide. The ZMWG has worked over the years to conduct sampling and analysis to develop a

database on mercury-added SLPs to inform users and other stakeholders. The online sale of these products has been highlighted, and work has been ongoing to place responsibility on e-commerce platforms to be more accountable for the products available on their platforms.

Ms. Lymberidi-Settimo discussed a case study regarding Amazon, which resulted in a judicial verdict requiring sellers of SLPs on their website to verify ingredients through laboratory testing. This demonstrated how a national ruling could be applied to online platforms and how online platforms could take action to regulate themselves, which would in turn ease the capacity needed by Customs and other agencies to monitor imports.

Ms. Bastiansz, BRI, then asked countries to share their experiences in managing MAPs. Participants' responses indicated that most products imported did not list mercury on their labels or in their ingredients, which made it more difficult to identify as an issue.

The development of prohibited products lists could also be considered for informing the public, as well as Customs and other key stakeholders who regulate hazardous products. As an example, products that enter local markets through the 'suitcase trade' (i.e., where persons import small batches with their personal items so it is not easily screened by Customs), could be better regulated through the publication and sharing of prohibited products lists as the public including potential consumers can help support phase-out activities once they are more informed. Ms. Kobylecka, WCO, referenced the EU RAPEX online system, a database that enables persons to check products logged on a public system, which could also be accessed by Customs and other agencies in the Asian region.

Mr. Satish Kumar Sinha from the non-governmental organisation, Toxics Link, observed that while mercury-added SLPs databases are being developed to enhance capacity, as the labelling and ingredient listing of mercury compounds used to manufacture these products are not as well known or labelled. Mr. Sinha noted that the dumping of mercury waste, especially transboundary movement of waste, is another issue of regional and global relevance. Additionally, the importance of Customs agents, Minamata Focal Points and Secretariat communication, and further capacity building to identify these aspects should be reviewed.

In terms of identifying the products to be seized via analytical testing, Ms. Rubesinghe, WHO Sri Lanka Office, indicated that there are several challenges due to lack of equipment and proper protocols to ensure timely turnaround of results so that products inspected can either

be released or seized. Ms. Lymberidi-Settimo, EEB/ZMWG, responded that the removal of the 1ppm threshold on mercury-added SLPs under the Minamata Convention was intended to assist countries in no longer needing to rely on detailed laboratory testing to determine if a product has more or less than the permissible limit (1ppm). Moving forward, countries can refer to databases or lists of mercury-added SLPs or utilise faster and more affordable analytical equipment such as x-ray fluorescence (XRF) analyzers that can screen products within a few minutes.

To further elaborate on how an XRF analyzer can be utilized, the Sri Lanka Atomic Energy Board facilitated an in-person demonstration for workshop participants. The use of the XRF to screen SLP samples was demonstrated using the desktop and handheld application. It was noted that the limit of detection for these types of instruments ranges based on the model and calibration but may be from approximately 5 – 15 ppm. Ms. Bastiansz, BRI, noted that in terms of SLPs, the presence of mercury usually exceeds 100 ppm. In comparison to other analyzers, the XRF is straightforward to use once personnel are trained and can yield results in approximately three minutes per sample.

Ms. Bastiansz then provided a brief presentation on the benefits of using a centralized database for mercury monitoring in cosmetics to support regulatory enforcement and monitoring, especially in lieu of analytical equipment. A globally available database will improve coordination and mapping of supply, demand and trade of potentially harmful products to enhance phaseout obligations under the Minamata Convention. Under the *Eliminating Mercury Skin Lightening Products* project, a database is being developed and will be made publicly available on the UNEP GMP website by late 2025.

Ms. Ali Shah, BRI, then asked country participants for feedback on whether a global database would be able to be utilized by Customs agencies and other governmental institutions under their existing protocols for data use. Responses indicated that the channel of communication for use by Customs may need to come from their relevant environmental or health authorities responsible for management of mercury imports unless there is an existing directive that permits Customs the authority to monitor these types of products.

Experiences in inter-agency coordination for managing mercury trade, storage and disposal in ASGM

Mr. Krishna Zaki from the Nexus3 Foundation in Indonesia, virtually presented on the actions taken by Indonesia to enhance monitoring capacities and the phase-out of mercury. It was noted that, due to varying scenarios of ASGM and cinnabar use in different provinces, national regulations have mandated Local Action Plans-led by environmental government agencies- to reduce or eliminate mercury at the sub-national level.

In assessing mercury trade, it was found that many informal traders use social media groups to advertise and sell large quantities of mercury and mercury compounds used in ASGM.

Regarding the sound handling, storage and disposal of mercury, Mr. Zaki indicated that domestic storage and disposal as well as interim storage for export options were discussed and are currently being explored. For countries with ASGM and cinnabar, efforts should be focused on ensuring adequate infrastructure to safely manage storage and disposal as needed under the provisions of available legislation and international guidance.

Experiences from Environmentally Sound Management of Mercury Containing Medical Measuring Devices (MCMMDs)

Mr. Huno Solomon Kofi Mensah, AIT, presented on a regional project that was conducted from 2019- 2021 on managing MCMMDs. The project focused on Indonesia and the Philippines and through assessments on the elimination of mercury waste from medical devices, it was found that awareness raising campaigns amongst healthcare facilities and related stakeholders was needed to encourage improved data collection and reporting on phase-out efforts. Technical guidelines were developed for each project country on the environmentally sound management of MCMMDs which can be referenced for further knowledge generation.

Risk Assessment Methodologies

Ms. Kobylecka, WCO, briefly introduced the tools that can be used by Customs authorities to manage risks when handling environmentally sensitive commodities. The risk management process allows for a structured approach when targeting high-risk consignments while enabling

low-risk consignments to move through the system in an efficient manner. Strategies to be developed for mercury trade management should allow for prevention, detection and response measures. Through the development of risk profiles, Customs agencies can use available data to determine the categories for assessment, whether imports from certain countries or manufacturers should be identified as high- or low- risk and what type of detection measures would be most effective based on existing capabilities.

Ms. Kobylecka, then led a practical group exercise for participants to engage in detecting and profiling high-risk mercury shipments and applying risk profiling methods to hypothetical mercury trade cases.

For the analysis and identification of risks, Customs agencies were encouraged to identify which governmental agencies they would need to coordinate with and rely on for guidance regarding the priority mercury trade issues for their respective countries. For example, in some countries, mercury-added SLPs may fall under the purview of the Ministry of Health while mercury compounds for ASGM or mercury waste may fall under the remit of the Ministry of Environment. These could then be further categorized by specific departments/divisions. Mapping out the relevant institutions and type of information or guidance needed should be a collaborative effort amongst agencies and a clear line of communication must be in place. Participants noted that in terms of mercury, the Minamata Initial Assessments conducted were used to identify priority sources of mercury trade and further updates could be sought from the National Focal Points for the Minamata Convention.

Other aspects to be considered included timeframes for high-risk profiling, which may apply where Customs authorities have limited capacities and therefore would identify feasible peak and low periods for high-risk profiling actions to be focused or in cases where shipments of high-risk goods may be on a particular schedule. Various risk indicators such as tariff classifications should also be included. Measures for testing, handling, storage and treatment/removal should also be assessed. A system for monitoring and evaluation of the effectiveness of actions should be developed to determine if any adjustments to methodologies should be applied.

Ms. Kobylecka encouraged stakeholders to continue discussions with their governmental colleagues and coordinate with their relevant competent national authorities to develop effective and streamline approaches to mercury risk assessment activities.

Ms. Kobylecka then presented considerations for the development of regional enforcement strategies and collaboration roadmaps. The WCO Asia-Pacific Plastic Waste Project implemented between 2020-2023 funded by the Government of Japan was highlighted as a reference available for lessons learnt in the development of a regional action plan. Proposed actions, identification of key stakeholders and timeframes for activities were included and topics covered included the strengthening of Customs-to-Customs and Customs-to-other-Government Agencies cooperation and communication.

For regional mercury approaches, countries need to first ensure their understanding of the Minamata Convention requirements and improve intelligence and information exchange on restrictions and prohibitions.

A brief exercise on and planning a joint operation with Customs, Ministry of Environment and other agencies was then facilitated by Ms. Kobylecka, WCO. Participants were encouraged to review listed actions involved in planning and preparation, implementation and evaluation for joint operations, and outline each action's purpose, timing and responsible stakeholders. Results varied based on each country's mercury priorities, existing regulations and responsible authorities. It was left to the countries to continue discussions on how such exercises could be formally adopted.

Closing Remarks

To close off the workshop, Ms. Stylo, UNEP, noted that the role of Customs in continued discussions was identified as key to ensuring that phase out efforts can be adequately monitored.

Ms. Ali Shah, BRI, also noted that this workshop is just one aspect of the coordinated efforts between the *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* and the project, *Eliminating Mercury Skin Lightening Products*. Online webinars will be made available between May – August 2025 to share information on different topics related to mercury trade and further reports/guidelines on managing trade of mercury-added SLPs will be shared later in the year.

Annex 1- Meeting Agenda

Project for
Promoting Minamata Convention on Mercury
by making the most of Japan's knowledge and experiences

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

Date: Tuesday 3 – Wednesday 4 June 2025, Colombo, Sri Lanka

Concept Note and Tentative Programme Agenda

Background

Mercury remains a major environmental and public health threat, with trade continuing to challenge enforcement efforts across the region. Despite international regulatory frameworks, such as the Minamata Convention on Mercury, gaps in policy implementation, border control, and intelligence-sharing allow mercury smuggling to persist. The region serves as both a transit hub and an end market, particularly for artisanal and small-scale gold mining (ASGM), which accounts for the largest source of global mercury emissions[1]. Mercury-added cosmetics (mainly skin lightening products) are also prevalent across the region. Lack of information, weak enforcement and informal supply chains exacerbate these challenges, exposing vulnerable populations to severe health risks.

The Minamata Convention mandates signatory countries to regulate mercury trade (Article 3), phase out mercury-added products [*including mercury-added skin lightening products*] (Article 4), and control ASGM-related emissions (Article 7). However, many nations across the region lack systematic trade monitoring mechanisms, making it difficult to track flows and enforce compliance. Strengthening customs enforcement, forensic detection, and inter-agency coordination is critical to tackling mercury smuggling.

[1] Global mercury assessment | UNEP - UN Environment Programme

Project for

Promoting Minamata Convention on Mercury

by making the most of Japan's knowledge and experiences

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.

Workshop Objectives

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.

Expected 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.

Tentative Agenda: Regional Training

Day 1 – Tuesday 3 June 2025

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 Jardan, World Health Organisation
10:45 – 11:05	***Short Break and Group Photo***	
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

<u>Day 2 – Wednesday 4 June 2025</u>

9:00 – 9:15	Recap of Day 1 and Overview of Plan for Day 2	AIT
9:15 – 9:40	Tools and Techniques for Detecting Mercury	BRI/ Sri Lanka Atomic Energy Board
9:40 – 10:00	Risk Assessment Methodologies – Detecting and Profiling High Risk Mercury Shipments	Anna Kobylecka, WCO
10:00 – 11:30	Group Activity: Apply Risk Profiling Methods to Hypothetical Hg Trade Cases	All Participants Facilitator: Anna Kobylecka, WCO
Session 3: **Cross-agency coordination and collaboration**		
11:30 – 11:45	Experiences in inter-agency coordination for managing mercury trade, storage and disposal in ASGM	Krishna Zaki, Nexus3 Foundation, Indonesia

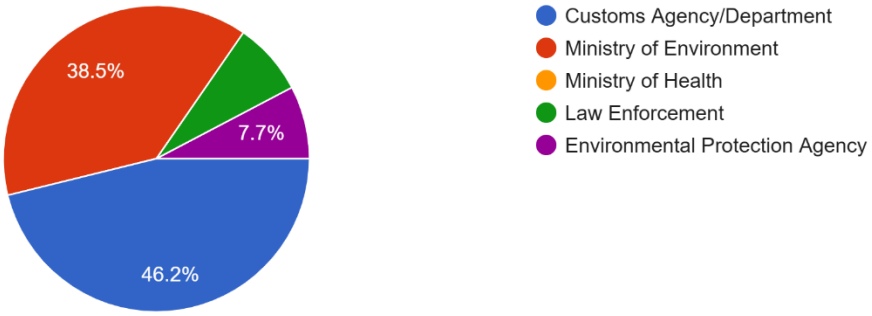
11:45 – 12:00	Best practices for HS Codes for Mercury Trade Monitoring	Kyaw Nyunt Maung, UNEP
12:00 – 12:15	Experiences in environmentally sound management of mercury containing medical measuring devices	Solomon Huno, AIT
12:15 – 12:30	Q&A Session	All Participants
12:30 – 13:30	***Lunch***	
13:30 – 14:30	Group Activity: Simulate Planning a Joint Operation with Customs, Ministry of Environment and Other Agencies	Anna Kobylecka, WCO
14:30 – 14:50	Development of regional enforcement strategies and collaboration roadmaps	Anna Kobylecka, WCO
14:50 – 15:30	Experience sharing on handling mercury-added products	Elena Lymberidi, ZMWG, BRI
15:30 – 16:30	• Afternoon tea/coffee • Summary of key takeaways from the training • Feedback from participants • Closing Remarks	All Participants

Annex 2 – Post-Training Survey

Post-Training Survey – Responses from 13 Participants

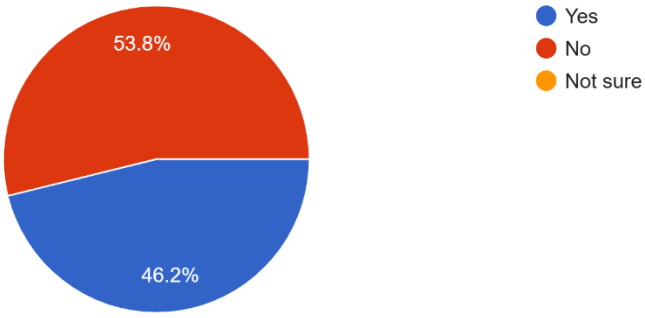
Which organization/agency are you affiliated with?

13 responses



Prior to today's session, have you ever received any mercury training or do you have prior understanding of the issues related to mercury, ...compounds or the Minamata Convention on Mercury?

13 responses



1. **What session(s) did you take the most interest in from the workshop's discussions?**

Participants expressed strong interest in a variety of workshop sessions, particularly those related to country reports and experiences with mercury, risk assessment and management, and the handling of mercury-added products. Many found all sessions relevant to their work, with specific praise for the presentations by Ms. Kobylecka (WCO) and the ZMWG's presentation on skin-lightening products (SLPs).

2. **Were there any topics discussed that you would have like to get further information on?**

Participants expressed interest in receiving further information on several key topics, including environmentally sound management and final disposal of mercury, handling and storage of

mercury and its compounds, identification of mercury-based products, and risk profiling. They also wanted more insight into seizure procedures, trends in illegal trade, and implementation of control measures for skin-lightening products (SLPs). Additional areas of interest included country best practices, repatriation and take-back processes, sources of mercury, relevant provisions of the Minamata Convention, and HS code amendments related to mercury-added products.

3. **Where there any topics NOT discussed that you would have like to get more information on?**

While several participants indicated that all relevant topics were covered, others expressed interest in additional information on monitoring mercury in the environment, managing and identifying seized mercury and mercury-added products, the costs of handling and storage, and procedures for repatriating seized materials. Some also wanted more details on standards for skin-lightening products (SLPs), identifying mercury-added products (MAPs), and deeper discussions on specific articles of the Minamata Convention.

4. **How would you rate the overall experience of the workshop?**

Participants gave the overall rating of the workshop 4.38 out of 5.

5. **Please provide any further feedback on how we could improve the workshop and recommendations for future potential workshops.**

Participants found the workshop informative and well-organized, with several expressing appreciation for the opportunity. Suggestions for improvement included extending the duration to allow deeper discussions, incorporating more group activities, and conducting follow-up trainings. Some recommended earlier requests for presentations to allow better coordination with relevant agencies, sharing workshop materials, and including visits to customs points. Others suggested involving cosmetic agencies, showcasing new technologies for mercury detection, and using videos to highlight current mercury-related issues. Overall, feedback was positive, with enthusiasm for future workshops.

Annex 3 – List of Participants

	Name	Country	Position	Organization/Ministry
Participants				
1	Mr. Harry Ahmad Fakri	Indonesia	Environmental Impact Controller	Deputy of Solid Waste, Hazardous Waste and Hazardous Substances Management Ministry of Environment and Forestry
2	Dr. Ratih Andrawina Suminar	Indonesia	Coordinator	Banten High Prosecutor's Office Attorney General's Office
3	Mr. Amir Afiq bin Abdullah	Malaysia	Environmental Control Officer	Department of Environment Malaysia Ministry of Natural Resources and Environmental Sustainability
4	Mr. Amirrudin bin Che Ali	Malaysia	Senior Assistant Director of Customs I	Royal Malaysian Customs Department Ministry of Finance
5	Mr. Zulmohammad Yusoff bin Mohd Yaacob	Malaysia	Senior Assistant Director of Customs II	Royal Malaysian Customs Department Ministry of Finance
6	Ms. Nafha Abbas	Maldives	Chemicals Management Officer	Ministry of Tourism and Environment
7	Ms. Mariyam Manik	Maldives	Senior Customs Officer	Maldives Custom Service Ministry of Finance and Treasury
8	Ms. Nabeela Abdulla	Maldives	Environment Analyst	Environmental Protection Agency Ministry of Climate Change, Environment and Energy
9	Mr. Keshab Joshi	Nepal	Environment Inspector	Ministry of Forests and Environment
10	Mr. Manoj Wagle	Nepal	Senior Divisional Chemist	Department of Customs Ministry of Finance
11	Mr. Ramesh Sukamani	Nepal	Section Officer	Department of Customs Ministry of Finance

12	Ms. Alyanna Kathleen Uy	Philippines	Engineer	Environmental Management Bureau Department of Environment and Natural Resources
13	Mr. Donnie Pirote Cordero	Philippines	Intelligence Officer I	Customs Intelligence and Investigation Service Bureau of Customs
14	Mr. Allan Cruz Escueta	Philippines	Special Police Lieutenant	Customs Police Division Bureau of Customs
15	Mr. Noppadon Srihirun	Thailand	Environmentalist	Pollution Control Department Ministry of Natural Resources and Environment
16	Mr. Kemmapat Laohapiengsak	Thailand	Customs Technical Officer, Practitioner Level	The Customs Department Ministry of Finance
17	Ms. Siriporn Mekdee	Thailand	Customs Technical Officer, Professional Level	The Customs Department Ministry of Finance
18	Ms. Pham Le Phuong Uyen	Vietnam	Officer	Vietnam Chemicals Agency Ministry of Industry and Trade
19	Ms. Tran Thuy Anh	Vietnam	Deputy Team Leader	Customs Supervision and Management Department Ministry of Finance
20	Mrs. Nguyen Ngan Hue	Vietnam	Officer	Department of Legal Affairs Ministry of Industry and Trade
21	T V Kumar	Sri Lanka	Assistant Superintendent	Sri Lanka Customs
22	Ms. Saranga Jayasundara	Sri Lanka	Programme Assistant	Ministry of Environment
23	Ms. Harindri Fernando	Sri Lanka	Environmental Officer	Central Environmental Authority
Organizers, Partners, and Resource Speakers				

24	Ms. Tahlia Ali Shah	Trinidad and Tobago	International Environmental Specialist	Biodiversity Research Institute
25	Ms. Ashley Bastiansz	Canada	Project Consultant	Biodiversity Research Institute
26	Ms. Eleni Maria Lymperidi	Greece	Policy Manager for 'Zero Mercury' Campaign	European Environmental Bureau
27	Dr. Guilberto Borongan	Philippines	Director	Regional Resource Centre for Asia and the Pacific Asian Institute of Technology
28	Mr. Huno Solomon Kofi Mensah	Ghana	Programme Specialist	Regional Resource Centre for Asia and the Pacific Asian Institute of Technology
29	Mr. Bishal Bhari	Nepal	Programme Officer	Regional Resource Centre for Asia and the Pacific Asian Institute of Technology
30	Mrs. Kristine Mendoza Perez	Philippines	Sr Admin Officer	Regional Resource Centre for Asia and the Pacific Asian Institute of Technology
31	Mr. Satish Kumar Sinha	India	Associate Director	Toxics Link
32	Dr. Kyaw Nyunt Maung	Myanmar	Data Analyst	United Nations Environment Programme
33	Ms. Malgorzata Stylo	Switzerland	Programme Management Officer	United Nations Environment Programme
34	Ms. Grace Halla	USA	Task Manager	United Nations Environment Programme
35	Ms. Anna Ewa Kobylecka	Poland	Technical Officer	World Customs Organization
36	Ms. Elena Jardan	Romania	Technical Officer	World Health Organization

37	Ms. Ammaarah Martinus	South Africa	Behavioural Insights Specialist	World Health Organization
38	Ms. Chalani Rubesinghe	Sri Lanka	National Consultant - Mercury and Health Project	World Health Organization Sri Lanka
39	Mr. Thirupathy Suveendran	Sri Lanka	National Professional Officer	World Health Organization Sri Lanka

Annex 4 – Presentations and Supporting Information

All meeting presentations and supporting information is available at the following link: https://drive.google.com/drive/folders/1JyO4ErnYUMGORL5X-fV-FdCQJYi9CToi?usp=sharing