



**Secretariat of the Minamata Convention on Mercury**

**United Nations Environment Programme**

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**Battery Industry Joint Position Paper on Revision of Minamata Convention**

**15 April 2020**

The representatives of the undersigned associations encompassing battery producers in Japan, Europe, North America and Latin America are writing to express our opinion on the revision of Annex A, Part I to the Minamata Convention. This responds to the information submission request issued by the Secretariat in COP3.

Currently, the Minamata Convention exempts the following batteries from the mercury ban: Button zinc silver oxide batteries with a mercury content < 2% and button zinc air batteries with a mercury content < 2%. This determination reflected market conditions that existed in 2013 when the Convention was adopted.

Since then, however, the battery industry's efforts to eliminate mercury have succeeded. All members of BAJ, EPBA, NEMA and ALPiBa have ceased manufacturing mercury-added button batteries and supply mercury-free alternatives. We believe our products collectively represent 90% of the global market.

Therefore, we are pleased to propose removal of the exemption as per the following table:

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

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

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

Yours sincerely,

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BAJ

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

**About BAJ**

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

**About EPBA**

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

**About NEMA**

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

**About ALPIBA**

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