



► LABADMIN/OSH

T: +41 22 799 6715  
E: labadmin-osh@ilo.org

4 March 2022

**Subject: SR Toxics/Mercury**

Dear Mr. Marcos Orellana, *Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes*:

The International Labour Organization (ILO) is grateful for the opportunity to respond to the call to gather inputs to the discussion on mercury exposures and human rights.

Since its founding in 1919, one of the core objectives of the ILO has been to promote occupational safety and health for workers globally. The ILO has long recognized the occupational risks posed by mercury exposure, and in fact, mercury poisoning was identified as one of the very first occupational diseases, listed in the ILO list of occupational diseases already in 1925. Since then, the ILO has developed and promoted numerous International Labour Standards relevant to safety and health, chemical hazards and mining.

The ILO would like to draw attention to the fact that millions of workers continue to be exposed to mercury worldwide. In a [recent global review](#), the ILO highlighted that artisanal and small-scale gold mining (ASGM) continues to be the largest user of mercury globally, with an estimated 14-19 million people working in the industry, throughout 70 countries. It is estimated that between 25 and 33 per cent of these miners suffer from chronic metallic mercury vapour intoxication – a shocking statistic that is potentially underestimated given the largely informal nature of ASGM operations.

In addition to ASGM workers exposed, the ILO is concerned by the multitude of additional sectors where workers continue to be exposed to mercury and suffer from a wide range of preventable health impacts. In a [recent technical report](#) on mercury in the world of work, the ILO highlighted a number of priority sectors including:

- Primary mercury mining, and other nonferrous ore mining (e.g. zinc, lead, copper)
- Chlor-alkali production
- Vinyl chloride monomer (VCM) production
- Acetaldehyde production
- Coal-fired power plant releases
- Oil and natural gas processing
- Manufacture of mercuric compounds, including organomercury compounds (e.g. antiseptics, fungicides)
- Manufacture of mercury-containing devices (e.g. mirrors, paint, fluorescent lights, batteries, barometers)

- Healthcare (where mercury-containing products are used)
- Healthcare waste processing
- Dentistry
- E-waste scavenging and recycling
- Recycling of mercury-containing devices
- Cosmetics (e.g. skin lightening products, eye make-up)
- Gilded crafts and religious idol production
- Biocide/pesticide agriculture
- Chemical laboratory processes
- Construction

The ILO's mercury report highlights priority sectors and specific worker population that do not always receive the international attention and support merited, such as waste-pickers and those involved in e-waste scavenging and recycling. It is important to highlight that while the move to sustainable energy sources provides numerous benefits to human health and the environment, the use of energy-efficient mercury-containing products has risen as a result in many regions. The risks to workers who handle these products along global production and supply chains must be considered. Compact fluorescent lamps for example often contain substantial mercury concentrations, and workers handling these products are at high risk of mercury exposure due to breakages and subsequent mercury vapour release.

The ILO would also like to draw your attention to a case study included in the ILO mercury report, bringing to light mercury exposures among communities in Nepal participating in a centuries old practice using gold-mercury amalgam to gold plate metal statues and religious icons. Biomonitoring studies have provided evidence of significant bodily burden of mercury. Workplace protections are negligible, and the vulnerability of workers is further amplified by a lack of information and limited awareness of mercury's toxic effects.

At its 108th Session (2019), the International Labour Conference (ILC) adopted a resolution requesting the ILO Governing Body "to consider, as soon as possible, proposals for including safe and healthy working conditions in the ILO's framework of fundamental principles and rights at work (FPRW)". These discussions will continue at the 2022 ILC, with an ultimate decision for potential inclusion of occupational safety and health within the ILO's FPRW framework. The outcome of these negotiations will have important implications for the ILO's actions on work-related exposures to toxics and wastes.

In closing, the ILO would like to reiterate its support to this process and remains at your disposal for further information on mercury exposures within the world of work.

Yours sincerely,



**Manal AZZI**

Occupational Safety and Health Team Lead  
 Senior Specialist on Occupational Safety and Health  
 LABADMIN/OSH Branch  
 International Labour Organization