

# Online Marketing of Toxic Skin Lighteners

Mercury cosmetics marketed  
as a 'solution' to dark skin

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October 2023



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**With NGO support** from the following Zero Mercury Working Group (ZMWG) member organizations listed in alphabetical order, that provided information and data for this report:

BAN Toxics, the Philippines; Bio Vision Africa, Uganda; Casa Cem, Mexico; Center for Environment Justice and Development (CEJAD), Kenya; Centre Africain pour la Santé Environnementale (CASE), Côte d'Ivoire; Earth, Thailand; Environment and Social Development Organization (ESDO), Bangladesh; European Environmental Bureau (EEB), Belgium; groundWork (gW), South Africa; Integrated Health Outreach (IHO), Antigua and Barbuda; Mercury Policy Project (MPP), USA; NEXUS3Foundation, Indonesia; Sustainable Research and Action for Environmental Development (SRADev), Nigeria; and Toxics Link, India.

**With government support** from Dr. Linroy Christian, Department of Analytical Services, Ministry of Agriculture, Antigua and Barbuda, who provided analytical and testing services.

**Editing and technical review:** Peter Maxson, Concorde East/West, Belgium; Micaela E. Martinez, Ph.D., WE ACT for Environmental Justice, New York, USA.

**Cover design:** Mario Cecilia, European Environmental Bureau

**Funded by:**

The Swedish International Development Agency (SIDA) via the Swedish Society for Nature Conservation (SSNC)

The Sills Family Foundation

The LIFE programme of the European Union



*This communication reflects the views and findings of the authors and analysts, and not necessarily those of the funders.*

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## Executive summary

The Minamata Convention on Mercury is a multilateral environmental agreement that addresses specific human activities that contribute to widespread mercury pollution. The Convention, as well as many national governments, bans the manufacture, import, and export of cosmetics with mercury content above 1ppm. However, searches of online platforms for suspect mercury-added skin lightening products (SLPs)—once sold primarily in local informal markets and beauty stores—have demonstrated that offerings and sales of SLPs have exploded globally and online. The latest Zero Mercury Working Group (ZMWG) investigation of suspect SLPs confirms yet again that mercury-added SLPs are still widely available around the world.

Preventing the production, trade, advertising and sale of mercury-added SLPs remains a significant challenge for public health institutions. Coupled with that, awareness of health risks from mercury-added SLPs is wholly inadequate to motivate the change needed globally. To effectively combat these SLPs, a coordinated interagency and international approach is needed to enact laws, enhance enforcement and promote awareness, without which mercury-added SLP sales will persist into the foreseeable future. Importantly, the continued growth of the SLP industry increases the risk to human health and the environment, while other mercury-added product categories are being phased out.

### Mercury in skin lightening products and related risks

This is the fourth global report by the ZMWG since 2017 on market surveillance of suspect SLPs. Since then, in collaboration with our NGO partners, we have analysed over 1000 SLPs from over 40 online platforms worldwide. Our global database is available on our website<sup>i</sup> and is also accessible on the UNEP Global Mercury Partnership website.<sup>ii</sup>

The body of research confirms that SLPs are most often used by people of color. While people of all genders may use SLPs, women and girls are particularly vulnerable due to social pressure and conditioning to use these products. Targeted advertising, social media and peer pressure can push individuals to embrace Eurocentric beauty standards that favor “fairer” (i.e., lighter) skin. These beauty standards not only cause societal and psychological harm to the consumer’s health and wellbeing but, due to the prevalence of mercury and other harmful chemicals in many SLPs, they present serious health risks, not only to the user, but also to those living in the same dwelling due to physical contact as well as mercury’s ability to easily vaporize and spread within the home.

Due to its melanin-suppression activity which lightens the skin, mercury has also been used in other skincare products to treat age spots, freckles and blemishes. However, regular use of mercury-added SLPs reduces the skin’s resistance to bacterial and fungal infections and may lead to rashes, skin discoloration and blotching. Mercury from SLPs may also enter the body via absorption through the skin, inhalation, or orally. Mercury is a neurotoxin, meaning that it damages the nervous system. Long-term use of mercury-added SLPs may damage the eyes, lungs, kidneys, digestive and immune systems.

### Controlling the proliferation of mercury-added SLPs

This investigation focused on a “target list” of 74 SLPs *suspected* of containing mercury, because they had been previously tested and identified by governments, academic reports and civil society

and found to contain mercury. In 2022-2023 we purchased samples of the suspected SLPs; and some brands were purchased in multiple countries. A total of 213 SLP samples were purchased by our partner NGOs from 23 online platforms in 12 countries. All samples were tested for mercury.<sup>iii</sup> Of the 213 SLPs purchased and analyzed, 191 (90%) were found to contain mercury levels that exceeded the widely accepted legal threshold of 1 ppm. The mercury concentration for these samples ranged between just over 1 ppm to 74800 ppm. Based on information on the product packaging, 121 (63%) of the 191 samples were manufactured or distributed from Pakistan (34%), Thailand (17%) or China (13%). Refer to Annex M below for details.

**Table A:** SLPs with mercury exceeding 1 ppm

<b>BRAND NAME</b>	<b>PRODUCT NAME</b>	<b>COUNTRY OF PURCHASE</b>	<b>ONLINE PLATFORM</b>	<b>MERCURY CONTENT RANGE (PPM)</b>
4K Plus	Whitening Night Cream	USA	amazon.com	4700,00
African Formula	Skin Lightening Cream	USA	amazon.com	9,70
Aneeza Gold	Beauty Cream; Beauty Cream with Avocado & Aloe Vera	Antigua and Barbuda; Kenya; Nigeria	jiji.ng; ebay.com; kilimall.co.ke	13637,33 - 32255
Arché	Formula AA Pearl Cream	Bangladesh; Belgium; India; Philippines; Thailand; USA	daraz.com.bd; befr.ebay.be; amazon.in; shopee.ph; shopee.co.th; ebay.com	1,46 - 137
BeBe Special Cream		USA	ebay.com	3600,00
Carotone	Creme B.S.C	USA	amazon.com	1,90
CCM Cream		USA	ebay.com	4200,00
Chandni	Whitening Cream	India; Indonesia; Kenya; Nigeria; Thailand;	amazon.in; tokopedia.com; jumia.co.ke; jumia.com.ng; shopee.co.th	20933 - 74800
Clear N Smooth	Plus HG - Skin brightening cream	USA	amazon.com	6,60
Cleo Me'	White - Lemon Formula	Philippines; Thailand	shopee.ph; lazada.co.th	4801 - 6605
Collagen Plus Vit E	Day Cream; Night Cream	Bangladesh; Belgium; India; Indonesia; Philippines; Thailand	daraz.com.bd; befr.ebay.be; amazon.in; bukalapak.com; shopee.ph; lazada.co.th	1,18 - 6842
Crusader	Skin Lightening Cream	USA	amazon.com	16,00
Dodo	White Up - Lait Revelateur de Teint	USA	amazon.com	2,10
Dr. Japan	Nano	Kenya; Thailand	jiji.co.ke; shopee.co.th	5663 - 6249
Dr. Yankee	Night Cream	USA	amazon.com	9000 - 11000

**Online marketing of toxic skin lighteners: Mercury cosmetics marketed as “solutions” to dark skin**

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Due	Beauty Cream	Bangladesh; India; Indonesia	Kablewala.com.bd; amazon.in; shopee.co.id	43700 - 50300
Egg White & Cherry	7 days specific eliminating freckle whitening cream	Bangladesh; India; Nigeria	Kablewala.com.bd; amazon.in; jiji.ng	6,4 - 3438
Erna	Whitening Cream	Indonesia	shopee.co.id	14,10
Face Fresh	Beauty Cream; Gold Beauty Cream	India; USA	flipkart.com; ebay.com; amazon.in	18000 - 37500
Faiza	Beauty Cream	India; Indonesia; Kenya; Philippines; Thailand, Uganda, USA	amazon.in; bukalapak.com; jumia.co.ke; shopee.ph; lazada.co.th; jiji.ug; amazon.com	7000 - 37700
Gluta White	Skin Whitening Cream - Advanced Glutathione Formula	India	flipkart.com	49300,00
Golden Pearl	Beauty Cream	Bangladesh; India; Indonesia; Kenya; Thailand	daraz.com.bd; amazon.in; tokopedia.com; jiji.co.ke; lazada.co.th	12749,79 - 43600
Goree	Beauty Cream with Lycopene; Day & Night Beauty Cream; Day & Night Whitening Cream.	India; Indonesia; Nigeria	amazon.in, shopee.co.id, shopee.ph; shopee.co.th; ebay.com; jiji.ng; bidorbuy.co.za; lazada.co.th	581 - 69900
Green Tea	seven-day - Whitening Anti-Freckle Cream	Bangladesh	daraz.com.bd	15,00
Hiyadi	Glutathione Cream - White and Bright	Philippines; Thailand; USA	shopee.ph; lazada.co.th; amazon.com	160 - 15939
Infocus	Pearl Beauty Cream	Nigeria; USA	jiji.ng; ebay.com	7524,14 - 18000
Jalea Real GRISI	Royal Jelly	USA	amazon.com	3,90
Jiaobi	BB Cream Skin Whitening Mate; Whitening & Moisturizing set: Flawless Whitening Essence, Whitening Day Cream, Whitening Make-up Base, Whitening Night Cream, Whitening Speckle-Eliminating Facial Cleanser	India, Indonesia, Thailand	flipkart.com, bukalapak.com; shopee.co.th	5,6 - 10300
Jiaoli	bird's nest - Whitening spot-removingscheme suit; HuiChuSu Face Cream 7 Days Specific Eliminating Freckle: Day, Night Cream	Bangladesh; Philippines; Thailand	daraz.com.bd; shopee.co.th; shopee.ph	5,3 - 7388
Kanza	Beauty Cream	India; Uganda; USA	amazon.in; jiji.ug; ebay.com	1,69 - 15000

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Kim	Whitening Ginseng and Pearl Cream; Whitening Pearl and Snow Lotus Cream	Bangladesh; Indonesia; Philippines; Thailand	shopee.ph; lazada.co.th; daraz.com.bd; shopee.co.id; shopee.co.th	840 - 25362
Kojie San	Dream White	USA	amazon.com	7,00
Kokliang	Snow Lotus Cream	Thailand; USA	lazada.co.th; amazon.com	16,4 - 19
La Crema de Rebeca		USA	ebay.com	12000,00
Ly-Na	Nourish Face Cream	USA	ebay.com	1,40
Nano Extra White	Whitening Cream with Papaya and Carrot	USA	amazon.com	8700,00
Natural 99	Vitamin E Plus: Day Cream, Night Cream	Indonesia; Philippines	shopee.co.id; shopee.ph	2,8 - 19,3
Natural Face	Beauty (Whitening) Cream	India; Uganda; USA;	flipkart.com; jiji.ug; amazon.com; ebay.com	735 - 5400
Navia	Beauty Cream	USA	ebay.com	35000,00
New Face	Beauty Cream	Antigua and Barbuda; Côte d'Ivoire; India; Kenya; USA	ebay.com; ubuy.ci; flipkart.com; jiji.co.ke	8050 - 43700
Non-Oily Deluxe Silken	Bleaching Cream	USA	ebay.com	18000 - 20000
Noor	Gold Beauty Cream; Herbal Beauty Cream	India; Kenya; South Africa	flipkart.com; jumia.co.ke; bidorbuy.co.za	8720,23 - 44200
Noor Gold	Beauty Cream	Kenya; South Africa	jiji.co.ke; bidorbuy.co.za	15676,5 - 24248
Nunn Care	Crema Limpiadora	USA	amazon.com; ebay.com	1500 - 7100
O White Extra	Whitening Cream	Philippines; Thailand	shopee.ph, shopee.co.th	2651 - 8514
Papaya	Whitening & Freckle-Eliminating package: Day, Night cream	Bangladesh; Belgium; Côte d'Ivoire; Kenya; Nigeria; Philippines; Uganda	jiji.ug; daraz.com.bd; amazon.com.be; jumia.co.ke; jumia.com.ng; shopee.ph; ubuy.ci	2813 - 13700
Parley	Beauty Cream; Goldie Advanced Beauty Cream	Kenya; Nigeria; Philippines; Thailand; Uganda	jumia.com.ng; jiji.ug; jumia.co.ke; shopee.ph; shopee.co.th	13278,14 - 34400
POP Popular	Curcuma cream; Facial Cream	Bangladesh; Thailand; Philippines	shopee.co.th; daraz.com.bd; shopee.ph; lazada.co.th	17,6 - 2385
Promina	Ginseng Pearl Cream	USA	amazon.com	16,00
RDL	Whitening Treatment - Day and Night Cream - 8 Days	Indonesia; Philippines	tokopedia.com; shopee.ph	1,3 - 18,5

	Treatment: Day, Night Cream			
Sakura	Gluta Speed White	Thailand	shopee.co.th	26,60
San ing	Face Cream	USA	amazon.com	7,80
San Ruby	Beauty Whitening Cream	USA	ebay.com	2,70
Sandal	Whitening Beauty Cream	Bangladesh; India	daraz.com.bd; flipkart.com	39900 - 54000
Stillman's	Skin Bleach Cream	Bangladesh; Philippines	daraz.com.bd; shopee.ph	805 - 810
Temulawak	New - Day & Night Cream - Beauty Whitening	Indonesia	bukalapak.com	27,6 - 2128
White Gold	Anti-Marks Cream Extra Brightening	Kenya; Philippines; South Africa; USA	jiji.co.ke; shopee.ph; bidorbuy.co.za; ebay.com	15,8 - 27000
White Rose	Whitening Cream: Placenta Sheep Cream, Super Gold Caviar	Philippines; Thailand	shopee.ph; lazada.co.th; shopee.co.th	747 - 3204
Yoko	Whitening Spa Salt for Armpit & Bikini Area	USA	amazon.com	1,50
Zuni Gold	Finest Beauty Cream	Kenya; Nigeria; USA	jumia.co.ke; jumia.com.ng; ebay.com	11382,08 - 19237,46

Adding to the challenge of identifying the sources of mercury SLPs, information on packaging is often misleading or false, and the possibility of counterfeit SLPs cannot be dismissed. Our investigations show that most of the mercury-added SLPs did not list mercury in the ingredients, and that many mercury-added SLPs were available on multiple online platforms around the world. For example, one SLP was purchased six times in six different countries, and all samples were found to contain mercury above the 1 ppm threshold. In other cases, the country of origin was not indicated, the name of the manufacturer was obscure, weblinks appeared to redirect to unsafe or unrelated webpages, or the indicated phone number did not connect to the manufacturer.

This report highlights the current lack of effective controls to prevent harmful and illegal mercury-added SLPs from being manufactured and offered online. Online platforms are evading their responsibility to prevent unscrupulous merchants from advertising, marketing and selling illicit mercury-added SLPs, which is occurring even in countries that are Parties to the Convention. This demonstrates the need for a more robust and coordinated international response, including additional restrictive measures, as discussed below in the African Region's proposed amendment to the Convention.

### **The proposed African Amendment to the Convention**

Despite the Convention's ban on the manufacture and trade of mercury-added SLPs, our data, along with many other studies conducted throughout the world, demonstrate the continued proliferation and global availability of mercury-added SLPs worldwide. To address this, the African Region has proposed an amendment for the Fifth Conference of the Parties (COP5) for the Minamata Convention on Mercury, which will be held in Geneva in late October 2023. This amendment is designed to complement and strengthen the existing provisions of the Convention, and will require Parties to take additional measures to reduce the availability of mercury-added SLPs including:



- Prohibiting the manufacture and trade of "*mercury-added cosmetics*", which would replace the current language that bans cosmetics containing "*over 1 ppm mercury.*"
- Curtailing the merchandising of mercury-added SLPs, including sales, offering of sales, marketing, advertising and display.
- Coordinating inter-ministerial, bilateral and/or regional measures to phase-out mercury-added SLPs.
- Enhancing public awareness about the hazards of mercury-added SLPs, especially among physicians, dermatologists and beauty centers, as well as the general public.

## **Conclusions and recommendations**

The toxic trade in mercury-added SLPs continues relatively unimpeded due to the challenges of holding local markets and online platforms to the same enforceable standards. Furthermore, there is evidence that the proliferation of mercury-added SLPs is being driven by (1) Eurocentric beauty standards and colorism, and (2) consumer advertisements and sales offerings that lead consumers to believe these products are both desirable and safe. To address these issues, the African Region has proposed an amendment for strengthening the Convention.

Initially, Party countries where SLPs are manufactured need additional support to develop a “roadmap” for phasing out mercury added SLPs,<sup>iv</sup> for which the first step would be disallowing manufacture and trade. This could include a timeline and “checklist” for coordinating ministries domestically, while fostering regional and international collaboration to effectively implement and enforce the Minamata Convention ban.

Through adoption of the African Amendment, Parties will be able to enhance their regional and/or global harmonization of legislation, enforcement measures, standards and communication systems to prevent the marketing of mercury-added SLPs. Such harmonization would simplify, facilitate, and accelerate more cost-effective solutions and help reduce product-related risk to consumers. It would also simplify procedures for policing imports and exports (e.g., using hand-held testing devices), and it would eliminate the current double standards that fail to protect consumer safety. In countries and regions with limited financial and technical resources, regional cooperation is especially critical.

Despite some cases of incremental progress, online platforms are still not sufficiently motivated to verify the legality of SLPs sold. While waiting for the necessary regulatory reforms, concrete complementary steps are needed to eliminate marketing and sales of mercury-added SLPs. For example, voluntary agreements on mutual information sharing and collaboration with e-platforms are increasingly being explored by governments. During the outreach phase, channels of communication need to be established to inform e-commerce platforms about various legal requirements, including labeling, detention lists, communications when posting alerts, etc.

Since the Convention does not yet regulate all mercury compounds, COP5 should also consider examining their supply, trade and use. As reported in the 2022-23 ZMWG investigation, and confirmed by a recent feasibility study commissioned by Natural Resources Defense Council (NRDC)<sup>v</sup> mercury compounds are an essential ingredient in mercury-added SLPs that some claim are legal to trade. It is therefore imperative that the COP considers regulating mercury compounds, subject to the Treaty's trade restrictions.

In summary, it's time to end the toxic trade in mercury added cosmetics. Adopting the African Region's proposed amendment to the Minamata Convention provides a near-term opportunity to address this global public health threat. Finally, the amendment would help complement and strengthen the current treaty, close loopholes that allow advertising, display and indiscriminate sales of mercury-added SLPs, and reflect a willingness to drive the change envisioned by the Convention to “Make Mercury History.”

## 1 Introduction

The Minamata Convention on Mercury (“the Convention”) bans the manufacture, import, and export of cosmetics with mercury content above 1 ppm.<sup>vi</sup> Despite this, hazardous mercury-added skin lightening products (SLPs) continue to be sold both in local markets and on the internet, contributing to a global mercury crisis that requires a coordinated international response. The lack of effective bans on the advertising and sale of mercury-added SLPs, coupled with inadequate enforcement and other factors, allow unscrupulous cosmetics manufacturers to continue selling them in countries that are Parties to the Convention. This report builds on previous work by the Zero Mercury Working Group and partners, providing a snapshot of the current status of online sale of toxic SLPs, and justifying the proposed African amendment to Annex A of the Convention.

The most common active ingredient in mercury-added creams, lotions and soaps is inorganic mercury (commonly in the form of mercury compounds such as mercury chloride or ammoniated mercury),<sup>vii</sup> because it is readily absorbed by the skin<sup>viii</sup> and it blocks the production of melanin in the skin. There is great concern that mercury compounds such as these added to SLPs are not presently regulated under the Convention.

Mercury-added SLPs present significant health risk. The World Health Organization (WHO) recognizes mercury as a “major public health concern.”<sup>ix,x</sup> Moreover, due to the common lack of full disclosure of ingredients on the labels, users are often unaware of the toxic ingredients in SLPs and the risk they may pose to their health and those that are living with them.

Prolonged mercury exposure can result in serious health problems ranging from dermatological to neurological. But even beyond mercury exposure through SLPs, the entire life-cycle of mercury from source to final release or disposal may have cumulative and disproportionate impacts on human health and the environment, especially in combination with other toxic substances in the daily living environment.

Regular use of mercury-added SLPs reduces the skin's resistance to bacterial and fungal infections and, depending on the concentration of mercury and the sensitivity of the user, may lead to rashes, skin discoloration and blotching. Mercury from SLPs may enter the body via absorption through the skin, via inhalation or orally. Due to its ability to vaporize as well as to spread through contact, mercury in SLPs is not only a risk to the user, but it may also expose other household members. Infants, children and the developing fetus are particularly vulnerable to the developmental health effects of mercury.<sup>xi</sup> Long-term use of mercury-added SLPs may damage the eyes, lungs, kidneys, digestive, immune and nervous systems.<sup>xii</sup>

Curtailing offline and online marketing of mercury-added SLPs is especially daunting, given the growing market share and challenges of regulating online sales. Violations of health and safety laws – facilitated by e-commerce sites – not only threaten public health, but also create an uneven

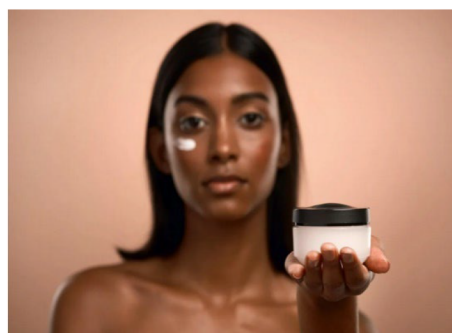
playing field since “brick and mortar” stores must comply with domestic laws that are more easily evaded online.

As evidenced by the latest round of ZMWG testing, the proliferation of mercury-added SLPs continues relatively unimpeded because of the lack of globally coordinated efforts to restrict or ban advertising and sales, along with weak enforcement, regulatory loopholes, and insufficient international cooperation – often due to inadequate resources and commitment to tackle the issue. To address these and other shortfalls, the African Region has proposed an amendment to the Minamata Convention (see Section 3 below) for consideration during the Fifth Conference of the Parties (COP5) in Geneva, Switzerland, in the Fall of 2023.

In this report, ZMWG presents its most recent findings of high mercury-added SLPs available from online platforms across the world. It also argues for support of African amendment – reinforcing their contention that governments around the world must step up efforts to tackle this growing global mercury menace.

### **Colorism**

SLPs are widely used by people of color all over the world, especially women but increasingly used by men. In particular, women and girls are often conditioned to adopt Eurocentric beauty standards influenced by “colorism,” a skin-color-based form of discrimination typically occurring within a given community or group, which favors lighter over darker skin color. SLP use is often perpetuated by media campaigns, which have been shown to successfully steer consumers to “lightening,” “whitening”, “brightening”, and “fairness” products.



<https://www.healthywomen.org/your-health/skin-lightening-creams-are->

Once sold primarily in local markets and beauty stores, the availability of SLPs has exploded online. The global market for SLPs was estimated at USD 8.8 billion in 2022, and is projected to reach USD 11.8 billion by 2026.<sup>i</sup> Extensive monitoring and testing demonstrate that SLPs are now available on all major social media platforms. Clearly, the media plays an influential role in how people live and perceive themselves, and often an outsized role in the purchase and use of skin lightening products.<sup>ii</sup> According to Dr. Anita Benson, a Nigerian dermatologist, “social media has become the most powerful tool right now for the sale of skin lightening products”. She is concerned that social media is helping people perpetuate colorism, and that it is now also providing the marketplace to pursue those misplaced ideals.<sup>iii</sup>

### **Health effects case study – Pakistan**

According to multiple studies, low-quality, widely available but hazardous cosmetic products in Pakistan have resulted in adverse health effects. Due to the open availability of locally manufactured cosmetic items at local stores, a large number of users in Pakistan — both men and women, urban and rural — have suffered skin damage and other clinical health issues. Most of the population has no knowledge of hazardous ingredients from mercury SLPs that may result in skin afflictions, carcinogenesis, or multiple organ failure.<sup>xiii</sup>

Pakistan’s Minamata Initial Assessment confirmed that mercury contaminated skin whitening creams are manufactured and commonly available in pharmacies and cosmetics shops throughout Pakistan, and both creams and soaps are “widely used both in rural and urban areas”<sup>xiv</sup> by men and women. A 2018 joint report of the Ministry of Climate Change and the Sustainable Development Policy Institute (SDPI) found that 56 of the 59 creams sampled by authorities, or 94%, exceeded the legal threshold.<sup>xv</sup> The industry producing SLPs “...is growing in Pakistan unlike other developed countries of the world”<sup>xvi</sup> with recent years seeing an exponential surge in cosmetic use in Pakistan.<sup>xvii</sup>

An indicator of widespread SLP use in Pakistan is the prevalence of SLP-related skin disease. SDPI conducted a survey of dermatologists and skin specialists in 29 hospitals and 14 private clinics in Peshawar, Islamabad and Rawalpindi in 2016. Among the findings, the overall incidence of patients with skin disease was over 70%, with some dermatologists receiving more than 50 patients per week.<sup>xviii</sup> More specifically, according to the SDPI survey, 42% of the dermatologists responding to the survey reported seeing between 10 and 50 patients per week who had developed skin ailments specifically from the use of SLPs.<sup>xix</sup>

The survey of dermatologists found virtually unanimous support for awareness raising, regulating the manufacture and sale of SLPs, and requiring an accurate and complete list of ingredients and their amounts. For example, 91% of dermatologists supported the revision of the current educational curriculum/syllabus so as to include mercury related information, and 98% supported banning the manufacture and sale of SLPs with a mercury content higher than 1ppm. There was also a consensus among respondents that advertising and television shows that promote toxic skin whiteners should be banned.<sup>xx</sup>

Advertisements for skin lighteners often depict darker skinned people as less apt to achieve professional success or personal happiness. Such promotional campaigns through the media (and especially television) help boost their business, resulting in substantial profit to the fairness cream industry (Shankar et al, 2006.) According to a report issued by the Pakistan Standards and Quality Control Authority (PSQCA), the largest producer in Pakistan is M/s Poonia Brothers who have “...invested millions in advertisement for Faiza Beauty Cream.”<sup>xxi</sup>

#### Survey of Dermatologists in Bangladesh

A 2022 survey of dermatologists, carried by the Environment and Social Development Organization under the ZMWG campaign, in Bangladesh, showed that about 60-70 percent of patients develop skin problems as a result of using skin lightening and fairness creams, with women accounting for up to 80 percent of those who use skin lightening creams. The average age groups that use skin lightening and fairness products range from 21 to 40 years old. The common health effects resulting from the use of mercury-added SLPs are redness and swelling i.e., skin irritation and inflammation, burning or stinging sensation, itchy and flaky skin, skin turning dark and too light, thinning of the skin, visible blood vessels in the skin, scarring and the long-term damage could be kidney or nervous system damage. The seriousness of damaging skin depends on the duration of using the skin cream containing harmful mercury as well as varying on different product brands. These are used by users twice or more a day.

Mercury is absorbed into the body through the skin. People have also reported skin rashes, blackened skin, and allergic reactions as a result of using these skin creams. Experts also added such skin creams contain harmful chemicals, such as steroids, hydroquinone, and mercury when in contact with the skin, can lead to acne, cancer, kidney damage, and deteriorates the nervous system.

Dermatologists underlined the fact that most of the SLPs are made of mercury, steroids, and other toxic chemicals. The most popular SLPs among Bangladeshi women are Korean and Chinese skin lightening creams, which are readily available for purchase online. Various online platforms (Daraz, Amazon), Facebook, local markets, and other downtown shops are the source of these skin-lightening beauty products



Faiza SLPs advertised by M/s Poonia Brothers

According to a study conducted by Askari (2013), over 90% of respondents in Lahore, Pakistan, agreed that television commercials for SLPs may change the perception of women regarding their complexion, which could only encourage more of the population to use SLPs.<sup>xxii</sup> Strongly influenced by advertising, Pakistanis spend Rs 101 billion per year on personal care products (i.e., 4% of household expenditures), with most relying on local markets selling cheap, low quality SLPs that are often hazardous and present severe health risks.<sup>xxiii</sup>

However, there has been a backlash against the powerful influence of the media. For example, an advertisement for skin lightening in Pakistan in 2015 sparked a debate about what some were calling their country's 'obsession' with lighter skin, as illustrated in the advertisements here.<sup>xxiv</sup>



Ad sparks debate over Pakistan's 'obsession' with fair skin<sup>xxv</sup>

More recently, “Black Lives Matter” has highlighted the hypocritical role of the beauty industry in expressing support for social justice issues while at the same time promoting “fairer” skin. Likewise, to name a few, movements such as the ‘Dark is Beautiful’ campaign launched by Women of Worth in India,<sup>xxvi</sup> ‘Unfair & Lovely’ in Austin, Texas, and ‘Dark is Divine’ in Pakistan have been instrumental in seeking cultural change and making today’s societies more inclusive, with the common message that all skin colors are equally beautiful.<sup>xxvii</sup>



The 'Dark is Beautiful' campaign was launched by Women of Worth in India

Also with considerable global influence, WHO recommends “not to use SLPs as skin is beautiful and we should love it as it is.”<sup>xxviii</sup>

## 2 Online sales of illegal SLPs: ZMWG sampling and analysis

This section presents the results of the latest ZMWG testing of suspect SLPs found online, contributing to the total of 775 SLPs purchased from online platforms and real-life shops and tested between 2017 and 2022.<sup>xxix</sup>

### 2.1 Methodology

74 SLPs suspected of containing mercury formed the main “target list” for this investigation, which is detailed in Annex A. This target list was partly based on findings from previous studies, to which new suspect SLPs were added, while others were removed based on past testing results and other criteria. For example, SLPs published on alerts or detention lists from government agencies were added to the target list, along with others recently identified by NGOs.

The initial step was for the ZMWG partners to check the availability of the “target list” of suspect SLPs on the major e-commerce platforms in their respective countries. Samples of those suspect SLPs were then purchased. In total, 213 samples were purchased by NGOs in 12 countries (see Annex K), including Antigua and Barbuda (4); Bangladesh (15); Belgium (8); India (21); Indonesia (21); Côte d’Ivoire (2); Kenya (15); Nigeria (13); the Philippines (26); South Africa (4); Thailand (28); Uganda (9); and the U.S. (47). Of those samples, 205 were identified as skin lightening creams, three as (milk) lotions, two as cleansers, one as a salt scrub, one as a powder, and one as a serum.

Annex I lists all samples, including the brand and name of each product, the country of purchase, the e-platform from which it was purchased, the country of origin or manufacture according to information on the packaging, and the mercury concentration as determined by testing.

SLPs purchased in Belgium were analyzed by the Quality Assurance and Control Systems (QACS) Lab in Greece. The laboratory used a Perkin Elmer AAnalyst™ 800 Atomic Absorption Spectrometer (AAS, see methodology in Annex D). Mercury-added SLPs purchased in the U.S. were analyzed by Inductively Coupled Plasma Optical Emission Spectroscopy (ICP-OES) analysis at the Legend Technical Services Laboratory in St. Paul, Minnesota (see Annex H). The rest of the SLPs were screened at three regional ZMWG hubs (see below) using XRF analyzers according to the protocols in Annex E (for purchases in Africa), Annex F (for purchases in the Caribbean) and Annex G (for purchases in Asia):<sup>1, xxx</sup>

- In Côte d’Ivoire (for Africa) the hub is managed by the Centre Africain pour la Santé Environnementale (CASE), and a Niton XL3t-970 GOLDD+ SDD XRF Analyzer was used;
- In Antigua and Barbuda (for Latin America and the Caribbean) the hub is managed by Integrated Health Outreach (IHO) and run by the Department of Analytical Services of the Ministry of Agriculture of Antigua and Barbuda; the samples were analysed with a Skyray Explorer 3000 RoHS XRF;
- In the Philippines (for Asia) the hub is managed by BAN Toxics, and the testing was carried out by QES. A SciAps X-ray Fluorescence Analyzer Model X-200 was used.

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<sup>1</sup> Direct and relatively simple analysis of samples via XRF is recognized as a generally reliable method to assess the mercury content of SLPs. An AAS analysis, on the other hand, may be relied upon to provide a more precise and reproducible reading.

Two mercury-added SLPs obtained in the Caribbean Region (representing 50% of the samples analyzed), as well as five of those from Africa and eleven from Asia (representing 10% of the samples analyzed), which had initially been screened with XRFs, were subsequently sent to the QACS lab for quality assurance analysis, i.e., to confirm the XRF readings.

## 2.2 Scope

14 NGOs from different countries participated in the exercise. In total, 33 online platforms were screened, with a total of 409 potentially high mercury SLPs found. Out of this number, 213 SLPs from 12 countries and 23 online platforms were purchased and tested, which formed the basis of the present investigation. Table 1 provides an overview of the countries and e-commerce platforms where samples were purchased.

**Table 1: Countries where samples were ordered, and respective e-commerce platforms**

<b>Countries where NGOs are based and where samples were ordered</b>	<b>E-commerce platforms from which samples were purchased</b>
Antigua and Barbuda	ebay.com
Bangladesh	daraz.com.bd; Kablewala.com.bd
Belgium	amazon.com.be; amazon.fr; befr.ebay.be
India	amazon.in; flipkart.com
Indonesia	bukalapak.com; shopee.co.id; tokopedia.com
Kenya	jiji.co.ke; jumia.co.ke; kilimall.co.ke
Nigeria	jiji.ng; jumia.com.ng; konga.com
Philippines	shopee.ph
South Africa	bidorbuy.co.za
Thailand	lazada.co.th; shopee.co.th
Uganda	jiji.ug
United States of America	amazon.com; ebay.com

## 2.3 Analysis

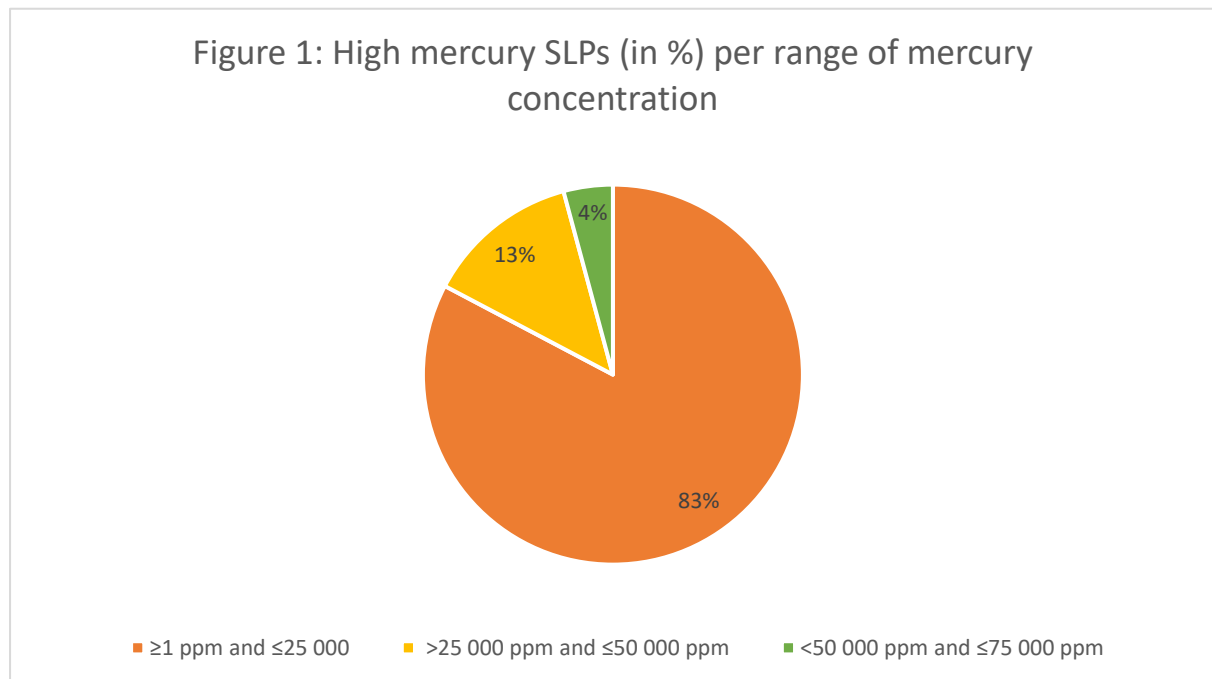
This investigation confirms yet again the global availability of mercury-added SLPs. Out of 213 SLPs purchased, 191 were found to contain mercury levels above 1 ppm (see Annex C). Some products of the same brand were purchased in different countries and through different platforms. NGOs from different countries sometimes used the same e-commerce platform but with different access (e.g., Amazon India vs. Amazon France). Test results (brand name and mercury concentration) are presented in Annex I.

### 2.3.1 Mercury content: percentage of samples above or below 1ppm

As mentioned above, 191 of the samples tested had mercury levels over 1 ppm. This corresponds to about 90% of the samples, although it should be recalled that the selection of the samples was based on a target list of SLPs already suspected of containing mercury (hence not randomly selected). The level of mercury concentration ranged between 1,18 ppm and 74 800,00 ppm.



Figure 1 shows the percentage of the samples per range of mercury concentration ( $\geq 1$  ppm and  $\leq 25\ 000$  ppm;  $>25\ 000$  ppm and  $\leq 50\ 000$  ppm;  $>50\ 000$  ppm and  $\leq 75\ 000$  ppm).

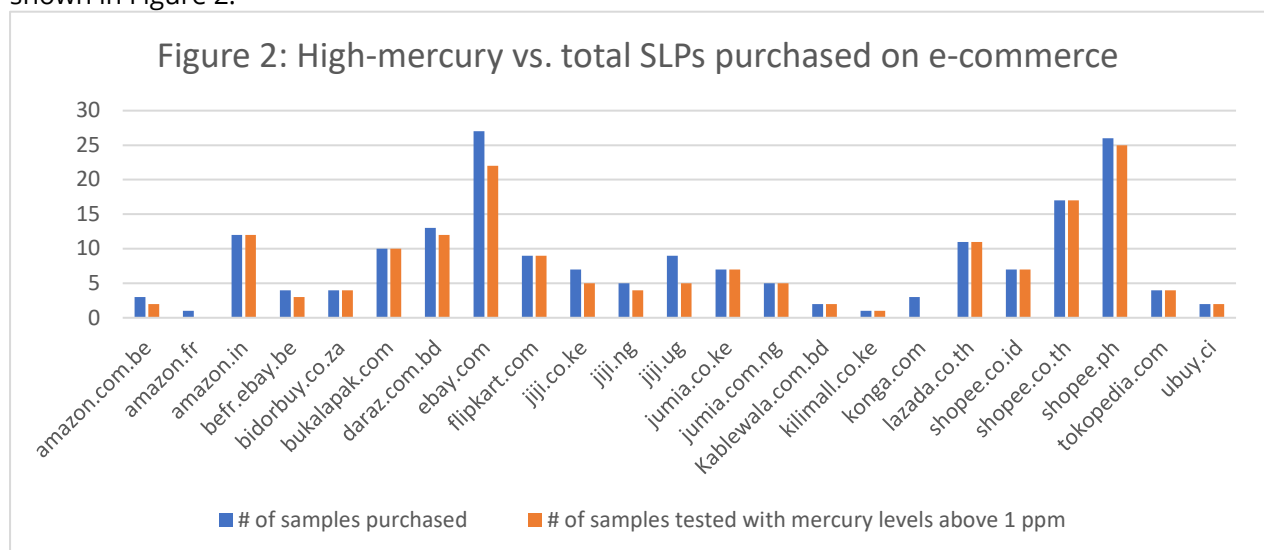


### 2.3.2 Country of origin

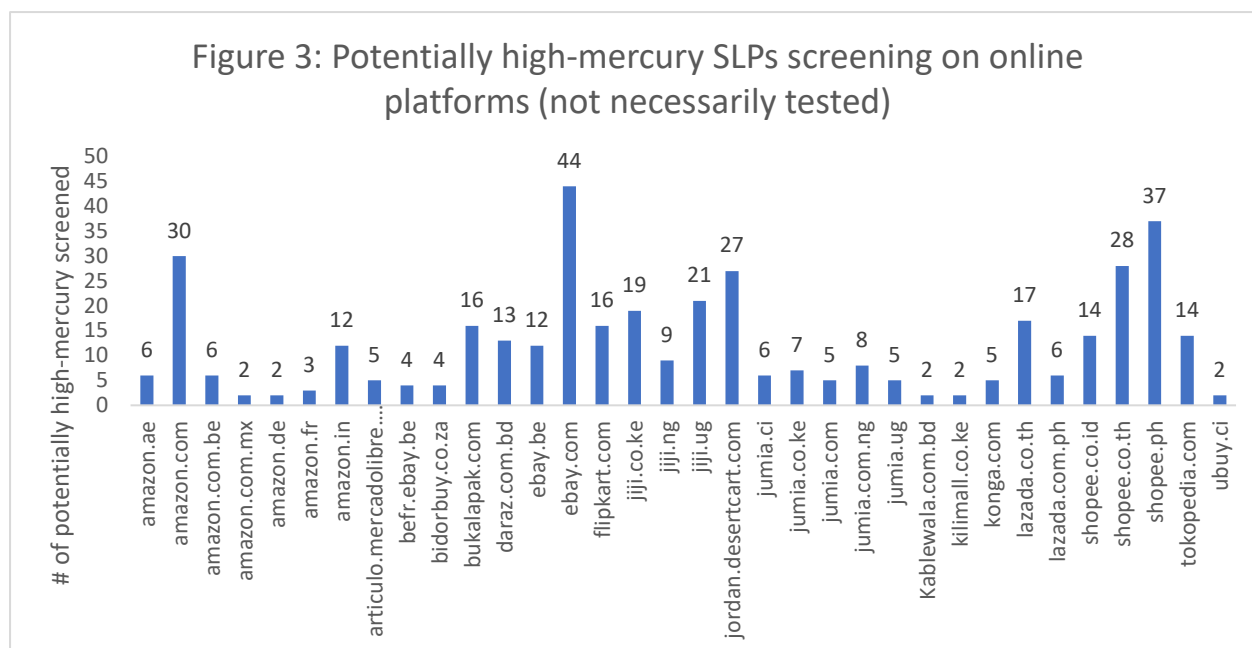
Based on the product packaging, 121 of the 191 samples were manufactured in or distributed from Pakistan (34%), Thailand (17%) and China (13%). No country of origin was recorded for 16% of the samples either because it was not indicated on the packaging or container, or due to a language issue. Annex M presents the percentage of SLPs per country of origin.

### 2.3.3 Availability of (potentially) high mercury SLPs per online platform

All online platforms were found to sell mercury-added SLPs except amazon.fr and konga.com, as shown in Figure 2.



Considering all online platforms that were screened for this investigation, but where products were not necessarily purchased, suspect SLPs were offered for sale on all of the platforms. Figure 3 presents the number of suspect SLPs found at a given point in time on each of the 33 online platforms. eBay.com, Shopee (Philippines), amazon.com, Shopee (Thailand) and Desercart (Jordan) were observed to be selling the most potentially high mercury SLPs.



### 2.3.4 False information and inconsistencies on packaging

The information on SLP packaging was sometimes found to be misleading or false. For example, the product Arché Formula AA Pearl Cream clearly indicated on its packaging that it did not contain mercury or hydroquinone. In the present study, this product was purchased six times in six different countries. In all cases, Arché Formula AA Pearl Cream was found to contain mercury above the 1 ppm threshold, ranging from 1,46 ppm to 137 ppm. Annex N, Table N.1 presents the results for all six cases.

In another case, “White Gold Anti-Marks Cream Extra Brightening” was purchased in the U.S. (2 samples), in Kenya, in South Africa and in the Philippines. While the packaging of each sample looked very similar, some differences were noted. The country of origin was not always indicated, or the name of the “manufacturer” happened to differ, as the photos in Annex O illustrate. It cannot be ignored that counterfeiting could explain different packaging from the same brand. Regardless, mercury was found in each sample, with the concentration ranging from 15,8 ppm to 23 000 ppm, as also shown under Annex N, Table N.2.

Further to this, contact details on the packaging where “Whitegold France, Int.” was listed as the manufacturer were also examined. The weblinks provided appeared to redirect to suspicious, unsafe or unrelated webpages, while the phone number did not connect to the White Gold manufacturer.

## 3 Convention amendment proposed by African Region

### 3.1 Need to strengthen the Convention

The proliferation of mercury-added SLPs is difficult to quantify worldwide. Yet, after continuously finding high mercury SLPs especially in the online market place, it is clear that at present the mercury SLP manufacture and trade ban under the Minamata Convention is not effectively implemented – neither in Africa nor elsewhere – even though at least ten African countries have already adopted regulations to curtail toxic skin lighteners, including South Africa, Kenya, Côte d'Ivoire, Ghana, Uganda, Tanzania, Rwanda, Nigeria, Cameroon and South Sudan.

To better address the ongoing global mercury health crisis associated with mercury-added SLPs, in May 2023 the African Region proposed an amendment to strengthen the existing provisions of the Convention (see Annex P).<sup>xxxii</sup> When adopted, the African amendment would require Parties to take additional measures such as setting national objectives, coordinating interagency responses, and collaborating regionally and/or globally. Following is a description of the proposed amendment to Annex A Part I and II of the Convention, as well as the context and justification.

### 3.2 Amending Part I of Annex A

**First, concerning amending Part I of Annex A**, the amendment proposes to replace the ban on cosmetics containing “over 1 ppm mercury” with wording prohibiting all “mercury-added” cosmetics. This zero tolerance would place the burden of proof on manufacturers and marketers instead of government authorities, who would need to determine only whether mercury is added or not. Parties could more effectively conduct market surveillance through utilization of simple, cost-effective hand-held testing devices, such as X-ray fluorescence analyzers (XRF), that preclude the need for costly laboratory analysis and academia and civil society could more easily and cost effectively assist governments in determining where mercury has been added to SLPs.

There are many governments that have already adopted a no threshold limit, including the European Union,<sup>xxxiii</sup> Kenya, Nigeria, South Africa, Rwanda, Ghana, Côte d'Ivoire, Sri Lanka, Thailand, United Arab Republic and others, including several U.S. states.

Therefore, a critical first step by Parties is to develop and enact a ban on mercury-added SLPs.

### 3.3 Amending Part II of Annex A

**Second, concerning amending Part II of Annex A**, three key measures are proposed to curtail the merchandising of SLPs to coordinate phase-out efforts, and to enhance public awareness about the hazards of SLPs, which are complementary to the proposed Part I amendment, along with a number of other key provisions.

### 3.3.1. Measure 1 – Curtail the merchandising of SLPs

*Measure 1 would seek to set national objectives to phase out sales and the offering of sales including, but not limited to, carrying out two or more of the four options (a) to (d) below.*

Like the Convention’s Annex A, Part II, for dental amalgam, the proposed amendment provides Parties with a menu of options. These options are designed to curtail sales, offering of sales, advertising, marketing and display of mercury-added SLPs. If Parties complement their national approach by implementing two or more of the following options, the circulation and availability of mercury SLPs could be effectively reduced. Relevant penalties should accompany these measures – which could feed into the sustainable financing of the monitoring and surveillance system.

*Option (a) – Developing and implementing strategies to discourage marketing, advertising and display of SLPs.*

While there are no official figures for Africa, billboards advertising SLPs can be seen across the continent.<sup>xxxiii</sup> Billboard advertising in Africa for over 50 years has portrayed lighter skinned women as icons of beauty, as did the electronic and print media industries.<sup>xxxiv</sup> As explained in Section 1, such advertising reinforces the belief that lighter/fairer skin is more desirable, and in turn feeds colorism and the continued use of risky SLPs, particularly for low-income people.



*A billboard in Abidjan, Côte d'Ivoire (ISSOUF SANOGO/AFP via Getty Images)<sup>xxxv</sup>*

**Advertising regulations** can support product bans and restrictions by obstructing the ability of manufacturers, distributors and retailers to reach out to potential customers.<sup>xxxvi</sup> Blocking ads of skin lightening products also sends a clear signal that colorism should end. Blocking ads of banned SLPs (from government prohibited lists or others) can clearly show to consumers, health care workers and government agencies that it is illegal to market or sell mercury-added SLPs, and that such products should be avoided.



*Billboard advertising skin lightening cream in Jessore, Bangladesh in 2010<sup>xxxvii</sup>*

*Option (b) – Developing and publicizing advisories, detention lists and prohibited substances lists of mercury-added cosmetics.*

**Prohibited products lists** (also called detention lists), advisories and alert systems are used by many governments to identify illegal and toxic SLPs. These are often posted and made publicly available on government websites to facilitate removal, raise consumer awareness and eventually protect people from harm. If a mercury-added SLP is determined to be non-compliant, it is added to a list notifying customs to stop imports until the importer or supplier certifies that the product is in compliance. Many national governments as well as state and local authorities also provide such information (e.g., the Kenya Bureau of Standards<sup>xxxviii</sup>).

**Advisories** are recommendations issued by authorities to raise awareness about consumer, environmental and health issues and also alert governments officials, and are often posted on government websites (e.g., Philippines cosmetic advisories).<sup>xxxix</sup> The posting usually provides concise information about product safety laws and the rights of consumers, along with the rights and obligations of companies.

**Alert systems** can draw attention to non-compliant products and can notify relevant authorities to withdraw the product from the market. If a product has been reported to be non-compliant in other jurisdictions that have similar provisions in place, the alert system information could be shared (e.g., the EU Safety Gate, which is a rapid alert system for dangerous non-food products).<sup>xl</sup>

Through government notifications, consumers can find information about submitting complaints and reporting any safety problems or other issues to authorities. Through such notifications, consumers can be notified when products are recalled.

While such systems/lists will need to be regularly updated, by taking up such measures the identification of dangerous products will be easier for enforcement authorities, police or customs, without further testing. In turn, this will accelerate monitoring and surveillance.

*Option (c) – Requiring licensing and product ingredient approvals for manufacturing of cosmetics and beauty products.*

Monitoring the industry to identify manufacturers of mercury-added SLPs is a necessary and important measure. Mercury is hardly ever listed in the ingredients list. The one noted exception is a product manufactured in Jamaica, “Deluxe Silken Beauty Cream,” which indicates on the packaging that it contains “Ammoniated Mercury 3%.”



An SLP listing ammoniated mercury among its ingredients

Many governments require licenses and product ingredient approvals for manufacturers that produce cosmetics. Licensing, registration or other advance authorizations can be used for import control not only of mercury, but also of mercury compounds that may be used as ingredients. Registration or other identification of importers of SLPs facilitates follow-up enforcement. Knowing where the mercury compounds come from could further contribute to strengthening the Convention (see section 5). Collection of any fees for licensing and registration may also be a useful source of revenue for supporting the monitoring program.

In addition, regulations can be adopted requiring certain information on the package labelling. Manufacturers and importers are required to disclose product ingredients, the producer’s name, address and country of manufacture, among others. Ingredient lists can inform consumers of their choices and also serve as a rough inspection tool. Failure to list mercury on the label should be viewed as a violation if it is then found in the product. The labeling language must be understandable in the country of sale. A set of model product labelling requirements may prove useful.<sup>xli</sup>

As explained in more detail in the next option, online platforms should also be required to fulfill the same requirements as domestic markets. This includes upholding product safety standards, ensuring that manufacturers/traders comply with licensing and labelling requirements, and seeking product ingredient approvals as required.

*Option (d) – Engaging online platforms in developing and implementing product safety pledges.*

Internet sales are a particular challenge for countries regulating toxic substances, as repeated investigations have shown over the years. E-commerce is often multinational, where unclear liability rules often lead to an uneven playing field. The current legal regulatory framework in most countries fails to adequately protect consumers from hazardous, counterfeit and illegal products sold online. A primary reason for this failure is that loopholes in national laws—or lack of enforcement—allow online platforms to evade responsibility. This lack of accountability removes

incentives for platforms to ensure product safety and results, at best, in voluntary episodic efforts to remove illegal products.

While waiting for the necessary regulatory reforms to come into effect, concrete complementary steps are needed to eliminate marketing and sales of mercury-added SLPs. Voluntary agreements on mutual information sharing and collaboration with e-platforms are an avenue increasingly considered by governments. During the outreach phase, channels of communication need to be established to inform e-commerce platforms about labelling requirements, detention lists, how to communicate when posting alerts, etc.

For example, since 2018 the European Commission has requested a voluntary commitment from online marketplaces to remove unsafe products including mercury-added SLPs.<sup>xlii</sup> Following an initial dialogue between the European Commission and four large e-commerce platforms, a voluntary agreement known as the “Product Safety Pledge” was signed, wherein the platforms committed to collaborate with the EU enforcement authorities regarding product safety. As of 28 March 2023, 11 e-commerce platforms have become signatories to the “Product Safety Pledge+.” Among the 20 areas of commitments, participants commit to 2-day product removals, and report twice a year. They also agree to proactive monitoring of recall sites such as the EU [Safety Gate](#) and additional commitments linked to recalls, transparency or trader education. Signatories will start applying the new commitment framework as of the 1<sup>st</sup> of December 2023. Since then, Australia<sup>xliii</sup> and Korea<sup>xliiv</sup> have established similar pledges.

In the Philippines, besides issuing advisories against products, the Food and Drug Administration has also issued orders for domestic e-commerce platforms such as Lazada Philippines and Shopee Philippines (the two main sources of unauthorized selling) to halt unapproved sales.

In summary, carrying out at least two of the above options, plus the two measures below, should contribute to ferreting out illegal and unsafe products from both local and on-line markets. Such measures further contribute to better implementing the manufacturing and trade bans of mercury-added SLPs – by providing more relevant information to the authorities, and by limiting the space where illegal manufacturers/traders can operate.

### **3.3.2. Measure 2 – Coordinate phase-out efforts**

*Measure 2 would require better coordination and collaboration on phase out initiatives inter-ministerially, bilaterally and/or regionally.*

Mercury-added SLPs generally fall within the jurisdiction of the Health Ministry, but in tandem, customs are charged with border controls, while Health and Environmental Ministries, sometimes in coordination with the police, tend to control the internal market. In addition, standards agencies may often have a role to play (ie in establishing the thresholds for banned products.) Accordingly, it is important that all relevant agencies and stakeholders are identified early in the process and a coordination structure is developed, outlining the responsibilities of various agencies. Inter-ministerial coordination helps to better control the illicit trade of such products within a country, especially when roles, responsibilities, mandates and decision-making processes are well defined.

Beyond inter-ministerial cooperation, bilateral and/or regional cooperation is also important to curtail transboundary mercury-added SLP advertising, trade and sales. Cross-border collaborations can leverage limited resources to share costs and technical expertise (e.g., for market surveillance and enforcement, information-sharing, product inspection and analysis, and

training.) Such collaboration can facilitate the identification of perpetrators, smuggling routes and the magnitude of illegal operations.

A regional alert system, for example, can be used to rapidly share information about non-compliant products among collaborating countries. Joint units for monitoring and tracing dangerous and non-compliant products sold online can inform the customs service, as well as consumers, regarding products that may be non-compliant. As mentioned above, the European Union e-Safety Gate Rapid Alert System (RAPEX) was put in place to restrict the supply of dangerous products. I.e., when one government identifies a dangerous product, they will notify other EU Member States.<sup>xlv</sup> A similar system is also in place under the Association of Southeast Asian Nations (ASEAN) covering 10 countries in the region. The ASEAN Cosmetic Directive includes several objectives from registration, notification and post-market surveillance, to labeling requirements and a prohibited substances list.<sup>xlvi</sup>

Other examples of government controls, regulations and cooperation schemes may be found in the ZMWG 2019 Enforcement report.<sup>xlvii</sup>

### **3.3.3. Measure 3 – Enhance awareness of the hazards of SLPs**

*Measure 3 would raise public awareness among physicians, dermatologists and beauty centers, as well as consumers and family members, about the hazards of mercury-added SLP use.*

Raising public awareness among physicians, dermatologists and beauty centers is key to informing consumers about the dangers of mercury-added SLPs. Collaboration with the medical community and civil society organizations (CSOs), along with education and outreach, can assist in effective implementation of a country’s strategy to curtail the availability and use of mercury-added SLPs and can help to prevent harm to consumers.

The medical community may also be a strong ally for consumer campaigns. Healthcare centers and dermatologists can distribute information to sensitive and at-risk subpopulations, e.g., pregnant women and nursing mothers. Information on the risks of certain product ingredients can also be presented along with information on how to submit complaints to the authorities.

Awareness also needs to be raised among government authorities in order to effectively address different aspects of the SLP issue and convey that information to diverse audiences.

Finally, the media’s role in the fight against skin lighteners cannot be overstated.<sup>xlviii</sup> In 2022, CNN ran a series, “White Lies: Exposing the dangers of skin whiteners,” which helped to raise public awareness globally through investigating skin whitening practices and their links to underlying drivers of colorism.





*Advertising the 2022 CNN series on skin whiteners*

CNN's research for the series convinced them that skin lightening “is a global menace masquerading as a helpful solution to the ‘problem’ of dark skin.”<sup>xlix</sup>

The raising of awareness is also linked to the social and cultural appreciations related to combating colorism altogether, as discussed previously.

## 4 Mercury compounds

The objective of the Convention is to protect human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds.

Under Article 3 of the Convention, control measures were adopted to restrict the global supply and trade of elemental mercury. However, mercury compounds are not similarly regulated.<sup>l</sup> Instead, under Article 3 of the Convention, consideration of mercury compound controls would be evaluated at a later date:

*The Conference of the Parties shall evaluate whether the trade in specific mercury compounds compromises the objective of this Convention and consider whether specific mercury compounds should, by their listing in an additional annex adopted in accordance with Article 27, be made subject to Paragraphs 6 and 8.*

As mentioned above, inorganic mercury compounds such as mercurous chloride (calomel), mercurous oxide and ammoniated mercury, among others, are used in skin lightening creams. The 2022-23 ZMWG investigation already highlighted the link between mercury-added SLPs and the trade of mercury and mercury compounds. A recent feasibility study commissioned by the Natural Resources Defense Council (NRDC)<sup>li</sup> has further confirmed that mercury compounds are not only used to produce mercury-added SLPs, but are also used in other products that are banned or about to be banned. While only a few of the products listed in Annex A involve mercury compounds, some of these may present unique enforcement challenges and/or adverse health consequences (such as the SLPs). During the 13<sup>th</sup> Global Mercury Partnership Advisory Group (PAG) members of the PAG identified key outcomes including the need to look more int online sales and trade in mercury compounds.<sup>lii</sup> Therefore, a mercury compound inventory would help to identify such situations.

## 5 Conclusions/recommendations

The latest ZMWG investigation of suspect skin lightening products (SLPs) advertised for sale by online platforms confirms yet again that toxic SLPs still persist and are widely available globally.

Preventing the production, trade, advertising and sales of mercury-added skin lightening products (SLPs) is a significant challenge for national governments and the Minamata Convention. A multipronged approach is needed to address the complex global mercury crisis. We need educational awareness-raising programs, regulations and supporting enforcement policies, and coordination among relevant ministries. These initiatives should be implemented in parallel with bi-lateral and regional collaboration efforts, in line with the Convention. Without a globally coordinated effort, mercury-added SLP sales will persist into the foreseeable future well after all other major mercury-added product categories have been phased out.

The proposed African Region’s Minamata COP5 amendment would complement and strengthen current treaty provisions and also close loopholes that allow advertising, display and indiscriminate sales of mercury-added SLPs. Furthermore, such an international collaboration and approach would help foster compliance with the Convention and level the playing field for legal domestic merchandisers who cannot compete with international sales of cheap high mercury SLPs. For the same reason that we need a legally binding treaty on mercury, the African amendment on cosmetics is necessary, since no one country can solve this global mercury-added SLP crisis alone.

As a first step, some Parties to the Convention where SLPs are manufactured need additional support to develop a “roadmap” for phasing out the production of mercury-added SLPs.<sup>liii</sup> The roadmap would include a timeline and “checklist”—coordinating ministries domestically as well as fostering regional and international collaboration—to effectively implement and enforce the Minamata Convention ban on mercury-added cosmetics. Such harmonization will simplify, facilitate and accelerate more cost-effective enforcement and help reduce product related risks to consumers. It will also simplify procedures for import and export, and it can eliminate double standards that fail to ensure consumer safety. Finally, in countries and regions with limited financial and technical resources, regional cooperation is especially critical.

Despite some cases of incremental progress, online platforms are still not sufficiently motivated to verify the legality of SLPs sold. While waiting for the necessary regulatory reforms to come into effect, concrete complementary steps are needed to eliminate marketing and sales of mercury-added SLPs. Voluntary agreements on mutual information sharing and collaboration with e-platforms are an avenue increasingly considered by governments. During the outreach phase, channels of communication need to be established to inform e-commerce platforms about labelling requirements, detention lists, how to communicate when posting alerts, etc.

Other multilateral environmental agreements (MEAs) have sought to address the issue of illegal trade. These MEAs include the Montreal Protocol, the Basel Convention and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The Environmental Network for Optimizing Regulatory Compliance on Illegal Traffic (ENFORCE) was established by COP-11 of the Basel Convention. It has a mandate to deliver capacity-building activities on preventing and combating illegal traffic. Its mission is achieved by initiatives such as:

- Promoting dialogue between its partners to develop a vision for preventing and combating illegal traffic.

- Improving understanding of the issues, the role of the various stakeholders, their challenges and needs, and how best to address them.
- Promoting cooperation between partners and a coordinated approach to capacity building activities, for instance through joint activities, in order to avoid duplication or gaps in the activities, to ensure a broader geographical distribution of such activities, and to prevent competition over resources.<sup>liv</sup>

There are also a variety of regional and global organizations already involved in the prevention of illegal chemicals and product trade. Wildlife and ozone depleting substances are two examples of commodities where governments are coordinating activities aimed at curbing illegal smuggling. International organizations are involved in organizing, managing and coordinating activities, and are often useful collaborators for developing integrated strategies.

The ICCWC (International Consortium on Combating Wildlife Crime) is also a collaborative effort between five inter-governmental organizations (CITES Secretariat, INTERPOL, UNODC, World Bank, World Customs Organization) with the mission to combat wildlife and forest crime by strengthening criminal justice systems and providing coordinated support at all levels, focusing on capacity-building of national agencies for effective enforcement.

Market investigation cooperation such as “Operation Pangea,” coordinated by INTERPOL and involving the WHO and the Permanent Forum of International Pharmaceutical Crime, can enhance enforcement efforts. The Secretariat of the Convention and other entities operating under the Convention have an important role to play. Adopting the African amendment sends a message that this compliance issue is a priority for future Convention work.<sup>lv</sup>

In light of the findings of the 2022-23 ZMWG investigation, and further confirmed by the recent NRDC feasibility study,<sup>lvi</sup> the Conference of Parties should consider addressing the supply, trade and use of mercury compounds. It is important that the COP considers whether mercury compounds must be regulated and subject to trade restrictions.

Finally, the proposed amendment by the African Region is a critical step towards addressing the global mercury menace arising from the illegal trade of high mercury-added SLPs. The amendment reflects the willingness of the African Region to drive the mercury change envisioned by the Minamata Convention. The upcoming COP-5 should endorse this forward-looking initiative and make it part of the fight to “Make Mercury History.”

## 6 Endnotes

<sup>i</sup> <http://www.zeromercury.org>

<sup>iii</sup> <https://www.unep.org/globalmercurypartnership/resources/tool/mercury-findings-skin-lightening-products-online-database>

<sup>iii</sup> Depending on the geographical location, samples were analyzed with a Perkin Elmer AAnalystTM 800 Atomic Absorption Spectrometer, an Inductively Coupled Plasma Optical Emission Spectroscopy, or an X-Ray Fluorescence Spectrometer followed up by a quality assurance protocol.

<sup>iv</sup> <https://www.unep.org/globalmercurypartnership/resources/guidance/guide-and-checklist-phasing-out-mercury-added-products-under-minamata-convention>

<sup>v</sup> Natural Resources Defense Council, Inc, Feasibility of conducting a global inventory of mercury compound supply, use and trade, (March 2023.)

<sup>vi</sup> With a phase-out date of 2020 for manufacture, import or export of cosmetics (with mercury content above 1ppm), including skin lightening soaps and creams, and not including eye area cosmetics where mercury is used as a preservative and no effective and safe substitute preservatives are available, are banned in Part I of Annex A. <https://mercuryconvention.org/en>

<sup>vii</sup> Ladizinski B, Mistry N, Kundu RV. Widespread use of toxic skin lightening compounds: medical and psychosocial aspects. *Dermatol Clin* 2011;29:111-23.

<sup>viii</sup> Ladizinski B, Mistry N, Kundu RV. Widespread use of toxic skin lightening compounds: medical and psychosocial aspects. *Dermatol Clin* 2011;29:111-23.

<sup>ix</sup> Exposure to Mercury: a major public health concern, second edition: Preventing disease through healthy environments. Chemical Safety and Health Unit, World Health Organization, 8 April 2021: <https://www.who.int/publications/i/item/9789240023567>

<sup>x</sup> <https://www.who.int/publications/i/item/WHO-CED-PHE-EPE-19.13>

<sup>xi</sup> [Mercury Poisoning Linked to Skin Products | FDA](#)

<sup>xii</sup> Mercury in skin lightening products. Chemical Safety and Health Unit, World Health Organization, 3 November 2019. [Mercury in skin lightening products \(who.int\)](#); Pollock S et al. (2021). The Dark Side of Skin Lightening: An International Collaboration and Review of a Public Health Issue Affecting Dermatology. *Int'l J. Women's Dermatology* 158, 159; Chen Z, Myers R, Wei T, Bind E, Kassim P, Wang G, Ji Y, Hong X, Caruso D, Bartell T, Gong Y, Strickland P, Navas-Acien A, Guallar E & Wang X (2014). Placental transfer and concentrations of cadmium, mercury, lead, and selenium in mothers, newborns, and young children. *Journal of Exposure Science & Environmental Epidemiology*, 24(5), 537–544. <https://doi.org/10.1038/jes.2014.26>; Dickenson CA, Woodruff TJ, Stotland NE, Dobraca D & Das R. (2013). Elevated mercury levels in pregnant woman linked to skin cream from Mexico. *American Journal of Obstetrics and Gynecology*, 209(2), e4–e5. <https://doi.org/10.1016/j.ajog.2013.05.030>

<sup>xiii</sup> Health Skin is Beauty NOT the Complexion, SDPI, 2016 and SDPI Research & News Bulletin, Volume 23, No.3, July – September 2016.

<sup>xiv</sup> Azfal, B., Raza, S., Ali, S.W., Abbas, Z., 2018. Pakistan MIA/Mercury Added Products: Mercury Poisoning Associated with International and Local Skin Whitening Creams in Pakistan. Ministry of Climate Change. Further, the data was also gathered through visit to PCMA (Pakistan Cosmetics Manufacturing Association) and PSQCA (Pakistan Standards and Quality Control Authority. [https://mercuryconvention.org/sites/default/files/documents/minamata\\_initial\\_assessment/Pakistan-MIA-2019-EN.pdf](https://mercuryconvention.org/sites/default/files/documents/minamata_initial_assessment/Pakistan-MIA-2019-EN.pdf)

<sup>xv</sup> Khan, N., Ullah, F., Khan, T., Zafar, U., Khan, M., Mustaqeem, M., Shah, S., Wu, D. & Ji, X. (2021). Personal-care cosmetic practices in Pakistan: Current perspectives and management. *Clinical, Cosmetic and Investigational Dermatology*, v. 14. doi: 10.2147/CCID.S270667

<sup>xvi</sup> Azfal, B., Raza, S., Ali, S.W., Abbas, Z., 2018. Pakistan MIA/Mercury Added Products: Mercury Poisoning Associated with International and Local Skin Whitening Creams in Pakistan. Ministry of Climate Change. [https://mercuryconvention.org/sites/default/files/documents/minamata\\_initial\\_assessment/Pakistan-MIA-2019-EN.pdf](https://mercuryconvention.org/sites/default/files/documents/minamata_initial_assessment/Pakistan-MIA-2019-EN.pdf)

<sup>xvii</sup> Nazeer Hussain Khan, Faiz Ullah, Taskin Aman Khan, Ujala Zafar, Muhammad Farhan Ali Khan, Muhammad Mustaqeem, Syed Sakhawat Shah, Dong-Dong Wu, and Xin-Ying Ji. "Personal-Care Cosmetic Practices in Pakistan: Current Perspectives and Management." *Clin Cosmet Investig Dermatol*. 2021;14:9–21. Published online 7 Jan 2021. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7800457/>

- <sup>xviii</sup> Health Skin is Beauty NOT the Complexion, SDPI, 2016 and SDPI Research & News Bulletin, Volume 23, No.3, July – September 2016.
- <sup>xix</sup> Khwaja, M. and Ali, S., *Adverse Health Impacts of Mercury Contained in Skin Whitening Creams*, SDPI Research, Vol 23 No.3, July – September 2016
- <sup>xx</sup> Health Skin is Beauty NOT the Complexion, SDPI, 2016 and SDPI Research & News Bulletin, Volume 23, No.3, July – September 2016.
- <sup>xxi</sup> <https://en.dailypakistan.com.pk/pakistan/popular-beauty-cream-banned-in-pakistan-over-toxic-chemical-use/>
- <sup>xxii</sup> Health Skin is Beauty NOT the Complexion, SDPI, 2016 and SDPI Research & News Bulletin, Volume 23, No.3, July – September 2016.
- <sup>xxiii</sup> Nazeer Hussain Khan, Faiz Ullah, Taskin Aman Khan, Ujala Zafar, Muhammad Farhan Ali Khan, Muhammad Mustaqeem, Syed Sakhawat Shah, Dong-Dong Wu, and Xin-Ying Ji. "Personal-Care Cosmetic Practices in Pakistan: Current Perspectives and Management." *Clin Cosmet Investig Dermatol*. 2021;14:9–21. Published online 7 Jan 2021. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7800457/>
- <sup>xxiv</sup> <https://www.bbc.com/news/av/world-27873464>
- <sup>xxv</sup> <https://www.youtube.com/watch?v=SyeOE8mgnig>
- <sup>xxvi</sup> [https://static.dw.com/image/17138851\\_303.jpg](https://static.dw.com/image/17138851_303.jpg)
- <sup>xxvii</sup> p. 140 <https://eeb.org/wp-content/uploads/2021/07/Report-16-1.pdf>
- <sup>xxviii</sup> <https://www.who.int/multi-media/details/mercury-in-skin-lightening-products>
- <sup>xxix</sup> <https://www.zeromercury.org/mercury-added-skin-lightening-creams-campaign/> and <https://www.zeromercury.org/cream-catalog/>
- <sup>xxx</sup> While most SLP samples are fairly homogeneous, “some may contain flakes or chunks of mercury salts, which may compromise the accuracy and reproducibility of an XRF test that generally involves only minimal manipulation of the sample,” according to Vrdoljak, G. et al, Comparison of XRF, TXRF, and ICP-MS Methods for Determination of Mercury in Face Creams, *Journal of Regulatory Science* 9(2) (2021) 1–8
- <sup>xxxi</sup> [https://mercuryconvention.org/sites/default/files/documents/2023-04/EN\\_Africa\\_Amendment%20Proposal\\_Cosmetics\\_March\\_2023.pdf](https://mercuryconvention.org/sites/default/files/documents/2023-04/EN_Africa_Amendment%20Proposal_Cosmetics_March_2023.pdf)
- <sup>xxxii</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02009R1223-20190813>
- <sup>xxxiii</sup> <https://www.theguardian.com/world/2015/may/07/ivory-coast-bans-potentially-deadly-skin-whitening-creams>
- <sup>xxxiv</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5345401/>
- <sup>xxxv</sup> <https://theconversation.com/skin-lighteners-fashion-and-family-still-driving-uptake-in-south-africa-170026>
- <sup>xxxvi</sup> An “advertisement” is a form of communication through the media promoting products, services or ideas, and paid for by a sponsor. It is used to encourage, persuade or manipulate consumers to continue with an existing habit/consumption pattern, or to adopt a new habit/consumption pattern.
- <sup>xxxvii</sup> <https://www.cnn.com/style/gallery/as-equals-white-lies-skin-whitening-brands/index.html>
- <sup>xxxviii</sup> [https://www.kebs.org/index.php?option=com\\_content&view=article&id=114&Itemid=154](https://www.kebs.org/index.php?option=com_content&view=article&id=114&Itemid=154)
- <sup>xxxix</sup> <https://www.fda.gov/ph/category/cosmetic-advisories/>
- <sup>xl</sup> <https://ec.europa.eu/safety-gate-alerts/screen/webReport>
- <sup>xli</sup> NOTE: see Table 1 of ZMWG Enforcement report, <https://www.zeromercury.org/wp-content/uploads/2019/11/Enforcement-measures-to-restrict-high-mercury-cosmetic-products-under-the-Minamata-Convention.pdf>
- <sup>xlii</sup> [https://commission.europa.eu/business-economy-euro/product-safety-and-requirements/product-safety/product-safety-pledge\\_en](https://commission.europa.eu/business-economy-euro/product-safety-and-requirements/product-safety/product-safety-pledge_en)
- <sup>xliiii</sup> <https://www.productsafety.gov.au/product-safety-laws/compliance/australian-product-safety-pledge>
- <sup>xliv</sup> <https://www.kats.go.kr/en/content.do?cmsid=534>
- <sup>xlv</sup> <https://joinup.ec.europa.eu/collection/rapex>
- <sup>xlvi</sup> [https://www.hsa.gov.sg/docs/default-source/hprg-cosmetics/annexes-of-the-asean-cosmetic-directive-\(updated-july-2019\).pdf](https://www.hsa.gov.sg/docs/default-source/hprg-cosmetics/annexes-of-the-asean-cosmetic-directive-(updated-july-2019).pdf); <https://asean.org/wp-content/uploads/2012/05/ASEAN-Guidelines-Limits-of-Contaminant-Cosmetics-.pdf>
- <sup>xlvii</sup> <https://www.zeromercury.org/wp-content/uploads/2019/11/Enforcement-measures-to-restrict-high-mercury-cosmetic-products-under-the-Minamata-Convention.pdf>
- <sup>xlviii</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5345401/>
- <sup>xlix</sup> <https://www.cnn.com/2021/11/14/world/as-equals-white-lies-skin-whitening-launch-intl-cmd/index.html>

<sup>i</sup> A “mercury compound” is defined in the Minamata Convention as any substance consisting of atoms of mercury and one or more atoms of other chemical elements that can be separated into different components only by chemical reactions. (See the Minamata Convention on Mercury, Article 2(e).)

<sup>ii</sup> Natural Resources Defense Council, Inc, Feasibility of conducting a global inventory of mercury compound supply, use and trade, (March 2023).

<sup>iii</sup> <https://wedocs.unep.org/bitstream/handle/20.500.11822/42024/PAG13-report.pdf?sequence=1&isAllowed=y>, p. 8

<sup>iiii</sup> <https://www.unep.org/globalmercurypartnership/resources/guidance/guide-and-checklist-phasing-out-mercury-added-products-under-minamata-convention>

<sup>lv</sup> <https://www.basel.int/Implementation/TechnicalAssistance/Partnerships/ENFORCE/Overview/tabid/4526/Default.aspx>

<sup>lv</sup> <https://mercuryconvention.org/en/events/fifth-meeting-implementation-and-compliance-committee>

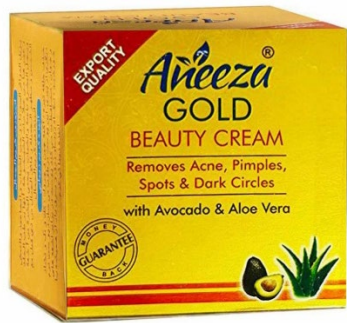


<sup>lvi</sup> Natural Resources Defense Council, Inc, Feasibility of conducting a global inventory of mercury compound supply, use and trade, (March 2023.)

## 7 Annexes

### 7.1 Annex A – ZMWG priority list of suspect SLPs

The priority list of SLPs was compiled from products tested by the ZMWG during 2017-2022 and found to contain more than 1 ppm mercury, or products that were on government or other detention and alert lists.

**Table 1: Priority list of suspect SLPs and images of the products/packaging**

#	Brand and product name	Picture
1	<b>Aneeza Gold</b> Beauty Cream with Avocado & Aloe Vera	
2	<b>Arché</b> Formula AA Arche Pearl Cream	
3	<b>BeBe Special Cream</b>	

<p>4</p>	<p><b>CCM</b> Special cream anti-melasma dark, spots cream</p>	
<p>5</p>	<p><b>Chandni</b> Whitening Cream</p>	
<p>6</p>	<p><b>Cleo me' White</b> Lemon Formula</p>	
<p>7</p>	<p><b>Collagen Plus Vit E</b> Day and Night Cream</p> <p><b>Note:</b> This box contains two creams (day and night cream). Please inventory them separately.</p>	
<p>8</p>	<p><b>Crema Blanqueadora</b> Whitening Cream Lisso</p>	



<p>9</p>	<p><b>Dr. Japan</b> Nano</p>	
<p>10</p>	<p><b>Due</b> Beauty Cream</p>	
<p>11</p>	<p><b>Egg White and Cherry</b> 7 Days Specific Eliminating Freckle Whitening Cream</p>	
<p>12</p>	<p><b>Erna</b> Whitening Cream</p>	
<p>13</p>	<p><b>Face Fresh</b> Beauty Cream</p>	
<p>14</p>	<p><b>Face Fresh Plus</b> Gold Beauty Cream</p>	

<p>15</p>	<p><b>Faiza</b> Beauty Cream</p> <p>Note: If you cannot find it when typing “Faiza Beauty Cream”, you can try with other keywords such as “Fair n Pink”.</p>	
<p>16</p>	<p><b>Gemli Grapeseed</b>      <b>Glutathione Extract</b> Whitening and Anti-Aging</p> <p>Note: This box contains two creams. Please inventory them separately.</p>	
<p>17</p>	<p><b>Gluta White</b> Skin Whitening Cream - Advanced Glutathione Formula</p>	
<p>18</p>	<p><b>Golden Pearl</b> Beauty Cream</p>	
<p>19</p>	<p><b>Goree</b> Beauty Cream with Lycopene</p>	

<p>20</p>	<p><b>Goree</b> Day and Night Whitening Cream</p>	
<p>21</p>	<p><b>Goree</b> Whitening Cream with Lycopene</p>	
<p>22</p>	<p><b>Green Tea</b> seven-day - Whitening Anti-Freckle Cream</p>	
<p>23</p>	<p><b>Hiyady Cream</b> Glutathione Cream White and Bright</p>	
<p>24</p>	<p><b>Hoori</b> Whitening Cream</p>	

<p>25</p>	<p><b>Huayenong</b> Bird's Nest Cosmetology</p>	
<p>26</p>	<p><b>Infocus</b> Pearl Beauty Cream</p>	
<p>27</p>	<p><b>JiaoBi</b> Whitening &amp; Moisturizing set</p> <p><b>Note:</b> This set contains several products. Please inventory them separately:</p> <ul style="list-style-type: none"> <li>- Whitening Speckle-Eliminating Facial Cleanser</li> <li>- Whitening Day Cream</li> <li>- Whitening Night Cream</li> <li>- Whitening Make-up Base</li> </ul>	
<p>28</p>	<p><b>JiaoLi</b> 10 days anti freckle cream (Jiaulihuc Hunsu Jioli Miraculous Day and Night Cream)</p>	





<p>29</p>	<p><b>Jiaoli</b> Bird's nest Whitening spot-removing scheme suit</p>	
<p>30</p>	<p><b>Jiaoli</b> Ginseng Bright White Spots-removing Set  <b>Note:</b> This box contains several products. Please inventory them separately.</p>	
<p>31</p>	<p><b>JiaoLi</b> HuiChuSu Face Cream 7 Day Specific Eliminating Freckle  <b>Note:</b> This box contains several products (day; night; serum). Please inventory them separately.</p>	
<p>32</p>	<p><b>JiaoLi</b> HuiChuSu Miraculous Cream  <b>Note:</b> This box contains several products (day and night). Please inventory them separately.</p>	

<p>33</p>	<p><b>JiaoLi</b></p> <p>HuiChuSu, 10-Days Eliminating Freckle Day &amp; Night</p> <p><b>Note:</b> This box contains several products. Please inventory them separately.</p>	
<p>34</p>	<p><b>JiaoLi</b></p> <p>HuiChuSu, Whitening Speckles Removed Cream AB Set</p> <p><b>Note:</b> This box contains several products. Please inventory them separately.</p>	
<p>35</p>	<p><b>Jiaoli</b></p> <p>Speckle Dispelling &amp; Whitening Cream</p>	
<p>36</p>	<p><b>JJJ</b></p> <p>Magic Spot Removing Cream  (day + night)</p> <p><b>Note:</b> This box contains several products (day and night). Please inventory them separately.</p>	

<p>37</p>	<p><b>Jolié</b> Beauty Cream</p>	 <p>The image shows the packaging for Jolie Beauty Cream. It features a woman's face and text including 'Jolie Beauty Cream', '5 DAYS WHITENING PLAN', 'Multi Vitamins', 'Papaya Extract', and 'REDUCES DARK SPOTS, SKIN MARKS &amp; OIL COLOUR'. The brand name 'Jolie' is prominently displayed in a stylized font.</p>
<p>38</p>	<p><b>Kanza</b> Beauty Cream</p>	 <p>The image shows the packaging for Kanza Beauty Cream. It includes a jar with a gold lid and a box. The box features a woman's face and text such as 'NEW LOOK', 'Super Quality', 'Beauty in Just 3 days', and 'Kanza Beauty Cream'.</p>
<p>39</p>	<p><b>Kim</b> Whitening Pearl and Snow Lotus Cream</p>	 <p>The image shows the packaging for Kim Whitening Pearl and Snow Lotus Cream. It consists of a box and a jar. The box has Thai text 'ครีมไข่มุกผสมบัวหิมะ' and 'WHITENING PEARL AND SNOW LOTUS CREAM'. The price '549.-' and 'NET WT 20 G.' are also visible.</p>
<p>40</p>	<p><b>Kim</b> Whitening Ginseng and Pearl Cream</p>	 <p>The image shows the packaging for Kim Whitening Ginseng and Pearl Cream. It features a jar with a red lid and a box. The box has Thai text 'ครีมสไมผสมงาดำไข่มุก' and 'WHITENING GINSENG AND PEARL CREAM'.</p>

<p>41</p>	<p><b>Kokliang</b> Snow Lotus Cream</p>	 <p>The image shows two boxes of Snow Lotus Skin Guardian cream. The left box is blue and white with a snow mountain illustration and text in Thai and English. The right box is blue and white with Thai text and a snow mountain illustration. Below the boxes is a white jar with a blue lid and a blue applicator.</p>
<p>42</p>	<p><b>La Crema de Rebeca</b> Crema Facial, Limpiadora y Curativa</p>	 <p>The image shows a white jar with a pink label that reads 'LA CREMA DE REBECA Crema Facial, Limpiadora y Curativa'. The label also includes 'Rebeca T.Q. Distribuidor Exclusivo' and 'Neto 38 gnl'.</p>
<p>43</p>	<p><b>La Tia Mana</b> Crema limpiadora y curativa</p>	 <p>The image shows a white jar with a green and red label that reads 'CREMA LIMPIADORA Y CURATIVA LA TIA MANA'. The label also includes 'www.tiamana.com'.</p>
<p>44</p>	<p><b>Lata Herbal</b> Skin Bright Cream</p>	 <p>The image shows a box of Lata Herbal Skin Bright Cream. The box is white and green with text in Hindi and English. The English text includes 'LATA HERBAL SKIN BRIGHT CREAM' and 'NATURAL CARE'.</p>
<p>45</p>	<p><b>Natural 99</b> Vitamin E Plus</p>	 <p>The image shows two jars of Natural 99 Vitamin E Plus cream and a green box. The jars are white and yellow with blue and red text. The box is green with a red circular logo and the text 'NATURAL 99 VITAMIN E PLUS'.</p>



<p>46</p>	<p><b>Natural Face</b> Beauty Cream</p>	 <p>The image shows a box of 'Natural Face Beauty Cream'. The box is yellow and green with floral patterns. Text on the box includes 'NEW! Improved!', 'NATURAL FACE Beauty Cream', a list of benefits: 'Whitening', 'Anti Wrinkle', 'Anti Aging', 'Skin Polishing', 'Anti Acne', and 'UV Protection', and 'Beautiful Face within 3 Days'. There is also Arabic text at the bottom.</p>
<p>47</p>	<p><b>New Face</b> Beauty Cream</p>	 <p>The image shows a box and a jar of 'New Face Beauty Cream'. The box is blue and pink, featuring a woman's face. Text includes 'newface™ Beauty Cream with extra whitening strength 7-DAYS Whitening Formula'. The jar is pink and has 'Batch#EEF000216' and 'NEWFACE Beauty Cream' printed on it.</p>
<p>48</p>	<p><b>New Face</b> Whitening Cream</p>	 <p>The image shows a box and a jar of 'New Face Whitening Cream'. The box is white and pink, featuring a woman's face. Text includes 'newface™ Whitening Cream with extra whitening strength 7-DAYS Whitening Formula'. The jar is pink and has '7-DAYS newface Whitening Cream' printed on it.</p>
<p>49</p>	<p><b>Non-Oily Deluxe Silken</b> Bleaching Cream</p>	 <p>The image shows two boxes of 'Non-Oily Deluxe Silken Bleaching Cream'. The left box is white and pink, with text: 'NON-OILY deluxe Silken® Bleaching Cream FOR OILY OR NORMAL SKIN', 'Whitening Formula', and 'NET WT. 90 g (1.14 OZ)'. The right box is purple and white, with text: 'NON-OILY deluxe Silken® Bleaching Cream FOR OILY OR NORMAL SKIN', 'Whitening Formula', and 'NET WT. 90 g (3.17 OZ)'. A price tag of '\$3.00' is visible on the right box.</p>
<p>50</p>	<p><b>Noor</b> Herbal Beauty Cream</p>	 <p>The image shows a box and a jar of 'Noor Herbal Beauty Cream'. The box is green and white, featuring an avocado and text: 'Noor Avocado and Aloe Vera HERBAL BEAUTY CREAM 7 Day Challenge Get Brighter Herbs'. The jar is green and white and has 'Noor HERBAL BEAUTY CREAM' printed on it.</p>

<p>51</p>	<p><b>Noor Gold</b> Beauty Cream</p>	 <p>The image shows the packaging for Noor Gold Beauty Cream. On the left is a yellow and green box labeled 'Export Pack' and '7 Day Challenge Avocado and Aloe Vera'. On the right is a yellow jar with a white lid, also labeled 'Noor Gold' and 'Avocado and Aloe Vera'.</p>
<p>52</p>	<p><b>Nunn Care</b> Crema Limpiadora</p>	 <p>The image shows a white jar with a pink and white label for 'NUNN CARE' Crema Limpiadora. The label features a silhouette of a woman's face.</p>
<p>53</p>	<p><b>O White</b> Whitening Cream Premium Package</p>	 <p>The image shows two views of O White Whitening Cream packaging. On the left is a gold and white jar on a gold box. On the right is a pink and white box labeled 'O White EXTRA WHITENING CREAM'.</p>
<p>54</p>	<p><b>Papaya</b> Whitening &amp; Freckle-Eliminating package</p> <p><b>Note:</b> This box contains several products (day and night). Please inventory them separately.</p>	 <p>The image shows the 'PAPAYA Whitening Anti-Freckle Package' by FEIQUE. It includes two orange jars labeled 'PAPAYA Day Cream' and 'PAPAYA Night Cream', and a box with a woman's face and a papaya. The box text includes 'Anti-Freckle - Whitening Renewing' and 'All - Natural Botanical Formula'.</p>
<p>55</p>	<p><b>Parley</b> Beauty Cream</p>	 <p>The image shows the packaging for Parley Beauty Cream. On the left is a purple and white box with a woman's face and text: 'No K', 'Parley Beauty Cream', '10 Problems / 1 Solution', and a list of skin issues. On the right is a purple jar with a white lid, also labeled 'Parley Beauty Cream'.</p>

<p>56</p>	<p><b>Parley</b> Herbal Beauty Cream with Avocado</p>	
<p>57</p>	<p><b>Parley</b> Herbal Whitening Cream</p>	
<p>58</p>	<p><b>Parley</b> Goldie Advanced Beauty Cream Pearl Shine</p>	
<p>59</p>	<p><b>Parley</b> Goldie Advanced Whitening Cream Pearl Shine</p>	

<p>60</p>	<p><b>Perlay</b> Goldie Hand and Body Cream Pearl Shine</p>	
<p>61</p>	<p><b>Pop</b> Popular Curcuma Cream</p>	
<p>62</p>	<p><b>Pop</b> Popular Facial Cream</p>	
<p>63</p>	<p><b>RDL</b> Whitening Treatment Night Cream 8 Days Treatment</p> <p><b>Note:</b> This box contains several products (day and night). Please inventory them separately.</p>	

<p>64</p>	<p><b>Sakura</b> Gluta Speed White</p>	
<p>65</p>	<p><b>Sandal</b> Whitening Beauty Cream</p>	
<p>66</p>	<p><b>Stillman's</b> Skin Bleach Cream</p>	
<p>67</p>	<p><b>Temulawak</b>  (New) Day &amp; Night Cream - Beauty Whitening Cream  <b>Note:</b> This box contains several products (day and night). Please inventory them separately.</p>	
<p>68</p>	<p><b>White Gold</b> Anti-Marks Cream  Extra Brightening</p>	

<p>69</p>	<p><b>White Pearl Plus</b> Cleanser Cream</p>	
<p>70</p>	<p><b>White Rose</b> Whitening Cream</p>	
<p>71</p>	<p><b>White Rose</b> Whitening Cream - Placenta Sheep Cream</p>	
<p>72</p>	<p><b>White Rose</b> Whitening Cream - Super Gold Caviar</p>	
<p>73</p>	<p><b>Yinni</b> Green Tea - Quick-acting Whitener and Speckle Remover</p> <p><b>Note:</b> This box contains several products. Please inventory them separately.</p>	

74	<b>Zuni Gold</b> Finest Beauty Cream	 The image shows the packaging for Zuni Gold Finest Beauty Cream. The packaging is primarily gold with a pink horizontal band. The text on the packaging includes 'zuni GOLD', 'Finest Beauty Cream', 'Reduces the Appearance of Wrinkles', 'Visibly Fairer Skin', and the Arabic text 'كريم الجمال' (Karam al-Jamal).
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## 7.2 Annex B — Instructions for sampling SLPs (2022)



### • Instructions for the 2022 sampling of skin-lightening products

Building upon the 2017-2018, 2019, and 2020-22 identification of high-mercury skin-lightening products, various governmental notification/detention lists, academic lists, a few NGO surveys and a recent testing in the US (September 2022), a revised Priority list of 74 creams has been compiled - see [Appendix 2](#) including pictures.

The ultimate goal of the ZMWG skin-lightening campaign is to phase out the manufacture and trade of illegal high mercury SLPs. Therefore, this new sampling round will aim to assess the state of play of online sales of harmful skin-lightening products, and evaluate whether online platforms have been continuing transactions of high mercury products. It will also aim to keep Internet sales in the spotlight and highlight to authorities possible flaws when it comes to liabilities for Internet platforms.

#### **Funding conditions for purchasing creams:**

- Any ZMWG member that is already contracted within the framework of the skin-lightening cream project (currently Bangladesh, Ivory Coast, the Philippines, as well as Kenya, Nigeria) will use their respective budget that has been allocated to the purchase of creams from internet, as per conditions below. You will need to contact the EEB BEFORE purchasing, to let us know which creams you found and respective costs, and we will get back to you with instructions on which ones to purchase.
- Any ZMWG member which is NOT contracted will be refunded for the purchased of creams as per conditions below. You need to contact the EEB BEFORE purchasing, to let us know which creams you found and respective costs, and we will get back to you with instructions on which ones to purchase.

### • STEP 1: Screening and purchasing from Internet

1. On the basis of the previous reports, the EEB has shortlisted a number of online platforms from where the purchase will be made. The EEB will inform you on which online platforms creams must be looked for in your country.
2. On each online platform selected, look for all the 74 creams provided in the 2022 Priority List as per [Appendix 2](#) (as well as your national detention list as relevant).

***IMPORTANT!!! The way platforms are searched matters. Please read below carefully!***

#### **How to search for the creams listed in the [Appendix 2](#) on online platforms?**

- In the search engine of the online platform, insert the exact name of the cream as a basis. If no result is found, try to play with the brand name by shortening it or by adding a word such as “whitening cream”, “lightening”, etc.
  - Eg. Instead of ‘JiaoLi HuiChunSu Face Cream 7 Day Specific Eliminating Freckle’, just type ‘Jiaoli’ or ‘Jiaoli whitening cream’ etc
- You can also try to translate the words ‘cream’ or ‘whitening cream’ in your language/website language



- You need to however ensure that the cream found is the exact cream searched for (as it is likely other types of creams to appear if only the brand name is looked for)
- Please make sure to ALSO have a look at the picture provided in the [Appendix 2](#), to ensure that the cream you have found is the same as the one we are looking for.
- NB: In some cases, a cream can be online, however the name of the brand does not appear in the title, nor in the description, which means that it will be really hard to find it (if a search is made via the brand name). So, it is also important to have a look at the picture of the creams and familiarize with them (see [Appendix 2](#)), so that you can spot creams for which no reference to the brand is provided. In relation to that, you could try typing ‘whitening cream’ in the search bar, and verify from the first results if any creams from [appendix 2](#) is appearing.

3. Once a cream from the 2022 Priority list has been spotted, **take a screenshot** of the page and save it under the following folder with your country name: [2022 Sampling round](#). Please name the screenshots according to the format “country abbreviation”-“name of product”, “day”-“month”-“year”.jpg.  
When taking the screenshot, make sure to **capture the online platform name, the cream itself and the date on your computer**. This way, we have definite proof that the company which sold the cream was available.
4. **As per the Appendix 3, fill in the blue sections** i.e. Brand name; product name; date of logging; the cost in local currency of the product; for how many creams it is (if more than one); the exchange rate to Euro at the date of noting the cost, using the XE Currency converter ([www.xe.com](http://www.xe.com)); and **copy paste the link to the product under the last column**, so that you can easily find it again after confirmation from the EEB which products to purchase.
- 
5. Send the **appendix 3** to the EEB at the following address: [charline.cheuvar@eeb.org](mailto:charline.cheuvar@eeb.org). The EEB will review it and advise on the creams to be selected for purchase.
- 
6. After EEB confirmation, please proceed with the purchase of the creams agreed with the EEB. When about to purchase, repeat steps 3 and 4 above, i.e.
  1. Take a new screenshot and save it in the second folder of your country folder under [2022 Sampling round](#)
  2. Update the information from the **blue sections** in the **Appendix 3** when needed (costs, date of purchase, etc)

## STEP 2: After you receive the purchased creams

### *Handling and storing of the purchased products*

7. Make sure to wear gloves when handling the creams (especially women), and try to be in a ventilated room.
8. Do not store the purchased products in hot conditions, as this may enhance breakdown of some mercury compounds, with subsequent loss of the mercury. Try to find the coolest secure place outside the house or office, and do not store the product near food, e.g. in the fridge.
9. Do not open the tube/box/jar (and do not remove the plastic wrapped around it, if there is any). They need to be delivered intact to the regional testing hubs.

10. If some of the creams were damaged during transportation, were opened or spilled, be extra careful. Please note it down in the comment section of **appendix 3**, and inform the EEB.

**Logging in/inventorying all other relevant information in the yellow columns of the Appendix 3.**

11. When products are sent to you, they usually arrive in an envelope or box. Please note down the address in **appendix 3 (column N) from where the products were actually shipped to you** – we call that the ‘intermediary’ (E.g. we order from Amazon US, but then on the envelope we can see that the cream came from a trader/individual/distribution centers/intermediaries based in India)
12. **Log all the remaining information in the Appendix 3 (yellow sections) BEFORE sending the samples to the testing hub. This step is important!** It includes: the reference number (to be stick on the cream jar/box too); expiration date, batch number; country and address of the intermediary who actually sent the product, the country of origin as per packaging, the manufacturer/distributor name; and indication of mercury in the ingredients lists.
  - Please be aware that some brands have several jars or tube in their box (e.g. night + day cream jars). **You will need to inventory them separately with a distinct reference number** as they constitute different creams of a same package.
13. **Take several pictures** of the samples purchased, including their **ingredients list and the manufacturer/distributor name + country of origin**. Please **save** the pictures under the 3rd folder of your country folder under [2022 Sampling round](#). Name the picture according to the format, "Reference number", "day"-“month”-“year”.jpg
14. Send electronically the fully filled-in **appendix 3** to:
  1. [Charline.cheuvart@eeb.org](mailto:Charline.cheuvart@eeb.org)
  2. And your regional hub
    - i. For Africa: Yannick Konan, CASE, Cote d'Ivoire.
    - ii. For Asia: Reynaldo San Juan, Ban Toxics, Philippines
    - iii. For Central America: *information to come*
15. Once steps 11-14 are fulfilled, then send the samples to your regional testing hub as per the **shipping instructions** that will be sent to you. The EEB DHL Account will be used as last year.

• **STEP 3: Shipping instructions**

16. To gain weight and space, please start by removing the boxes to only keep the jars or tubes, with the reference numbers stuck on them. Please pack each jar in a individual small zipper plastic bag (or plastic bubble bag) to ensure protection of the jar and avoid contamination of the creams in case one was to open during transportation.
17. Please pack the creams in the smallest possible **box**, as the cost is relevant to the size and weight of the box. Make sure that the box is packed properly to avoid that the creams get damaged – **so please do not use envelop or bags, but only box with the samples secured inside**. In the box, please also include the appendix 3 (to be sent via email too as per step 14).
  -
18. We will use the EEB DHL account to ship the samples. Further instructions will be provided in due course.

• **STEP 4: Testing by regional hubs**

1. Screening of mercury content is then to be done by XRF.
2. Please note that creams from a same package should be tested **separately** and NOT mixed up together (e.g. Collagen Vit E contains two creams: a day and a night creams. They should be tested separately)
3. The results as well as the methodology used need to be communicated to the EEB.
4. As part of a verification of the testing, 10% of the high mercury samples from each testing hub will be sent to an accredited lab for confirmatory analyses. The EEB DHL account will be used for the shipment.

• **TIMELINE**

TIMELINE	2022				2023				
	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
Meeting to explain protocol and how to inventory									
Screening on e-platform + 1st part of inventory									
Sample selection for purchase together with the EEB									
Purchase of the samples + 2 <sup>nd</sup> part of inventory									
Inventory finalized upon reception of samples									
Samples sent to testing hub									
Testing of samples									
Results sent to the EEB									
10% of samples sent for lab verification									

*If you have general questions, please contact:*

Charline Cheuvart, EEB/ZMWG

Email: [charline.cheuvart@eeb.org](mailto:charline.cheuvart@eeb.org)

Elena Lymberidi-Settimo, EEB/ZMWG

Email: [elena.lymberidi@eeb.org](mailto:elena.lymberidi@eeb.org), Telephone: +32 496 532818

## **ZMWG Sampling protocol 2022 – Logging information**

By means of an Excel, the following information was collected for each sample purchased:

Reference number

- Brand name
- Product name
- Screenshot saved with the day of checking/ purchase
- Date of logging
- Expiration date
- Batch Number
- Product identification number (eg: ASIN, EAN, UPC etc)
- Cost (local currency)
- Number of products (if batch)
- Date of logging cost
- Exchange rate (xe.com)
- Cost (Euro)
- Delivery Cost (Euro)
- Country and address details of the intermediary who actually sent the product
- Country of origin as per packaging
- Manufacturer/distributor
- Indication of mercury content from ingredients list (tick X if indicated)
- Photo of the product purchased
- Photo of the ingredient list of the product purchased
- Internet Link of the cream on the platform
- Comments (if any)

**Screenshot of the template and a sample of the information collected:**

Online marketing of toxic skin lighteners: Mercury cosmetics marketed as “solutions” to dark skin

October 2023

	A	B	C	D	E	F	G	H
1								
2	<b>Annex 3 – ZMWG Sampling protocol 2020 – Logging information.</b>							
3								
4								
5	<b>NB: Please duplicate this logging/table for each Internet platform from where you bought creams (see tab of the excel sheet)</b>							
6								
7	Legend	to be filled in when you found the cream on the internet						
8		to be filled in when you have actually received the cream						
9								
10								
11								
12	Country:	[Fill in Name]						
13	Internet Platform:	[Fill in Name]						
14								
		<b>Reference number</b>	<b>Brand name</b>	<b>Product name</b>	<b>Screenshot saved with the day of checking/ purchase</b>	<b>Date of logging</b>	<b>Expiration date</b>	<b>Batch Number</b>
15	<i>Comments</i>	<i>As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside cream box/jar</i>	<i>Please indicate the brand name of the cream.</i>	<i>Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E, etc)</i>	<i>Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform, the product and date on your computer. Name the screenshots according to the format, "name of</i>	<i>this is the date when you connected on the e-commerce and found the cream</i>	<i>The date of expiration. It can appear on the jar of the cream OR on the box. Check also inside the box</i>	<i>The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics of production. It can be found on the jar of the cream OR on the box. Check also inside the box. It can also appear aside the expiration date or</i>
16								
17	Example 1	BE09	Due	Beauty Cream	See in folder #1 Screenshot	20/10/2021	Dec-24	7737
18	Example 2	BE05	Face Fresh	Beauty Cream	See in folder #1 Screenshot	19/01/2021	October 2023	N24318
19								
20								

### 7.3 Annex C—High-mercury SLPs identified in this study

**Table C1:** Brand and product name of SLPs purchased in **Africa**, country of purchase, e-commerce platform where the samples were purchased, country of origin, and mercury concentration (in ppm), as determined by a Niton XL3t-970 GOLDD+ SDD XRF Analyzer. Five of these SLPs (with \*) were subsequently analyzed in a lab using Hydride Atomic Absorption Spectroscopy. The lab results for these six SLPs agreed well with the XRF results.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
New Face	Beauty Cream	Côte d'Ivoire	ubuy.ci	Pakistan	19194,81
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Côte d'Ivoire	ubuy.ci	China	6750*
Chandni	Whitening Cream	Kenya	jumia.co.ke	Pakistan	25339,74
Zuni Gold	Finest Beauty Cream	Kenya	jumia.co.ke	United States of America	19237,46
White Gold	Anti-Marks Cream Extra Brightening	Kenya	jiji.co.ke	N/A	18237,64
New Face	Beauty Cream	Kenya	jiji.co.ke	Pakistan	15801,46
Noor	Herbal Beauty Cream	Kenya	jumia.co.ke	Pakistan	15679,41
Noor Gold	Beauty Cream	Kenya	jiji.co.ke	Pakistan	15676,5
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Kenya	kilimall.co.ke	Pakistan	13637,33
Parley	Goldie Advanced Beauty Cream	Kenya	jumia.co.ke	Pakistan	13278,14
Golden Pearl	Beauty Cream	Kenya	jiji.co.ke	Pakistan	12749,79
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Kenya	jumia.co.ke	China	12035,46
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Kenya	jumia.co.ke	China	11838,88
Faiza	Beauty Cream	Kenya	jumia.co.ke	Pakistan	9060,74
Dr. Japan	Nano	Kenya	jiji.co.ke	N/A	5663*
Chandni	Whitening Cream	Nigeria	jumia.com.ng	Pakistan	20933
Aneeza Gold	Beauty Cream	Nigeria	jiji.ng	Pakistan	20008,67
Goree	Day & Night Whitening Cream	Nigeria	jiji.ng	Pakistan	19742,72
Parley	Beauty Cream	Nigeria	jumia.com.ng	Pakistan	13828,93

Zuni Gold	Finest Beauty Cream	Nigeria	jumia.com.ng	United States of America	11382,08
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Nigeria	jumia.com.ng	China	8049*
Infocus	Pearl Beauty Cream	Nigeria	jiji.ng	Pakistan	7524,14
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Nigeria	jumia.com.ng	China	2995,17
Egg White & Cherry	7 Days Specific Eliminating Freckle Whitening Cream - Night Cream	Nigeria	jiji.ng	Taiwan	12,54
Noor Gold	Beauty Cream	South Africa	bidorbuy.co.za	Pakistan	24248*
Goree	Day & Night Whitening Cream	South Africa	bidorbuy.co.za	Pakistan	18556,45
White Gold	Anti-Marks Cream Extra Brightening	South Africa	bidorbuy.co.za	Pakistan	15414,22
Noor	Herbal Beauty Cream	South Africa	bidorbuy.co.za	Pakistan	8720,23
Parley	Beauty Cream	Uganda	jiji.ug	Pakistan	13380,08
Faiza	Beauty Cream	Uganda	jiji.ug	Pakistan	9251,62
Papaya	Whitening & Freckle-Eliminating package	Uganda	jiji.ug	China	5153,37
Natural Face	Beauty Cream	Uganda	jiji.ug	Pakistan	3598,51
Kanza	Beauty Cream	Uganda	jiji.ug	Pakistan	1,69*

**Table C2:** Brand and product name of SLPs purchased in **Asia**, country of purchase, e-commerce platform where the samples were purchased, country of origin, and mercury concentration (in ppm), as determined using a SciAps X-ray Fluorescence Analyzer Model X-200. 10% of these SLPs (with \*) were subsequently tested in a lab using Hydride Atomic Absorption Spectroscopy, giving results that varied somewhat from those recorded during XRF screening; therefore, the readings in this table should be considered only as indicative results showing high presence of mercury, and should not be interpreted as absolute values.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	OF	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
Due	Beauty Cream	Bangladesh		Kablewala.com.bd	Pakistan	43700
Sandal	Whitening Beauty Cream	Bangladesh		daraz.com.bd	Pakistan	39900
Golden Pearl	Beauty Cream	Bangladesh		daraz.com.bd	Pakistan	37400

Papaya	Whitening & Freckle-Eliminating package - Day Cream	Bangladesh	daraz.com.bd	China	4949
Jiaoli	bird's nest - Whitening spot-removingscheme suit	Bangladesh	daraz.com.bd	China	4034
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Bangladesh	daraz.com.bd	China	3740
Kim	Whitening Pearl and Snow Lotus Cream	Bangladesh	daraz.com.bd	N/A	2480
POP Popular	Facial Cream	Bangladesh	daraz.com.bd	Thailand	2385*
Stillman's	Skin Bleach Cream	Bangladesh	daraz.com.bd	United States of America	810
Collagen Plus Vit E	Night Cream	Bangladesh	daraz.com.bd	N/A	803
Arché	Formula AA Pearl Cream	Bangladesh	daraz.com.bd	Thailand	127,7
Collagen Plus Vit E	Day Cream	Bangladesh	daraz.com.bd	N/A	19,1
Green Tea	seven-day - Whitening Anti-Freckle Cream	Bangladesh	daraz.com.bd	Taiwan	15
Egg White & Cherry	7 days specific eliminating freckle whitening cream	Bangladesh	Kablewala.com.bd	Taiwan	6,4
Chandni	Whitening Cream	India	amazon.in	Pakistan	73200
Goree	Beauty Cream with Lycopene	India	amazon.in	Pakistan	66300
Goree	Day & Night Whitening Cream	India	amazon.in	Pakistan	58000
Sandal	Whitening Beauty Cream	India	flipkart.com	Pakistan	54000
Due	Beauty Cream	India	amazon.in	India	50300
Gluta White	Skin Whitening Cream - Advanced Glutathione Formula	India	flipkart.com	United States of America	49300
Noor	Gold Beauty Cream	India	flipkart.com	Pakistan	44200
New Face	Beauty Cream	India	flipkart.com	Pakistan	43700
Golden Pearl	Beauty Cream	India	amazon.in	Pakistan	38000
Face Fresh	Beauty Cream	India	flipkart.com	Pakistan	37500
Faiza	Beauty Cream	India	amazon.in	Pakistan	30400
Face Fresh	Gold Beauty Cream	India	amazon.in	Pakistan	27700
Egg White & Cherry	7 days specific eliminating freckle whitening cream	India	amazon.in	Taiwan	3438



Collagen Plus Vit E	Night Cream	India	amazon.in	N/A	2789*
Jiaobi	Whitening & Moisturizing set - Whitening Night Cream	India	flipkart.com	N/A	1177
Natural Face	Beauty Cream	India	flipkart.com	Pakistan	735*
Arché	Formula AA Pearl Cream	India	amazon.in	Thailand	78,6
Jiaobi	BB Cream Skin Whitening Mate	India	flipkart.com	N/A	15,6
Jiaobi	Whitening & Moisturizing set - Whitening Day Cream	India	flipkart.com	N/A	10,3
Collagen Plus Vit E	Day Cream	India	amazon.in	N/A	1,7
Kanza	Beauty Cream	India	amazon.in	Pakistan	1,7
Goree	Day & Night Whitening Cream	Indonesia	shopee.co.id	Pakistan	64700
Due	Beauty Cream	Indonesia	shopee.co.id	Pakistan	48000
Golden Pearl	Beauty Cream	Indonesia	tokopedia.com	Pakistan	43600
Chandni	Whitening Cream	Indonesia	tokopedia.com	United Arab Emirates	40500
Goree	Beauty Cream with Lycopene	Indonesia	shopee.co.id	Pakistan	38700
Kim	Whitening Pearl and Snow Lotus Cream	Indonesia	shopee.co.id	Thailand	25362*
Faiza	Beauty Cream	Indonesia	bukalapak.co m	Pakistan	15208*
Jiaobi	Whitening & Moisturizing set - Whitening Night Cream	Indonesia	bukalapak.co m	China	10300
Collagen Plus Vit E	Night Cream	Indonesia	bukalapak.co m	N/A	3990
Temulawak	New - Day & Night Cream - Beauty Whitening - Night Cream	Indonesia	bukalapak.co m	Malaysia	2128
Temulawak	New - Day & Night Cream - Beauty Whitening - Day Cream	Indonesia	bukalapak.co m	Malaysia	27,6
Erna	Whitening Cream	Indonesia	shopee.co.id	N/A	14,1
Natural 99	Vitamin E Plus Night Cream	Indonesia	shopee.co.id	N/A	14,1
Jiaobi	Whitening & Moisturizing set - Whitening Make-up Base	Indonesia	bukalapak.co m	China	9,4
Jiaobi	Whitening & Moisturizing set - Whitening Day Cream	Indonesia	bukalapak.co m	China	8,2

Jiaobi	Whitening & Moisturizing set - Flawless Whitening Essence	Indonesia	bukalapak.com	China	6,2
Jiaobi	Whitening & Moisturizing set - Whitening Speckle-Eliminating Facial Cleanser	Indonesia	bukalapak.com	China	5,6
Natural 99	Vitamin E Plus Day Cream	Indonesia	shopee.co.id	N/A	2,8
RDL	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Day Cream	Indonesia	tokopedia.com	Philippines	2,1
Collagen Plus Vit E	Day Cream	Indonesia	bukalapak.com	N/A	1,7
RDL	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Night Cream	Indonesia	tokopedia.com	Philippines	1,3
Goree	Day & Night Whitening Cream	Philippines	shopee.ph	Pakistan	69900
Goree	Beauty Cream with Lycopene	Philippines	shopee.ph	Pakistan	49200
Faiza	Beauty Cream	Philippines	shopee.ph	Pakistan	37000
Parley	Goldie Advanced Beauty Cream	Philippines	shopee.ph	Pakistan	31895*
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Philippines	shopee.ph	China	13700
Cleo Me'	White - Lemon Formula	Philippines	shopee.ph	Thailand	4801
Hiyadi	Glutathione Cream - White and Bright	Philippines	shopee.ph	Thailand	3493
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Philippines	shopee.ph	China	2813
O White Extra	Whitening Cream	Philippines	shopee.ph	Thailand	2651
Collagen Plus Vit E	Night Cream	Philippines	shopee.ph	N/A	2529
Kim	Whitening Ginseng and Pearl Cream	Philippines	shopee.ph	Korea, South	1458
Kim	Whitening Pearl and Snow Lotus Cream	Philippines	shopee.ph	Korea, South	1150
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Night	Philippines	shopee.ph	China	1043
Stillman's	Skin Bleach Cream	Philippines	shopee.ph	United States of America	805
White Rose	Whitening Cream	Philippines	shopee.ph	Thailand	747
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Day	Philippines	shopee.ph	China	718

Arché	Formula AA Pearl Cream	Philippines	shopee.ph	Thailand	137
POP Popular	Facial Cream	Philippines	shopee.ph	Thailand	24,1
Natural 99	Vitamin E Plus Night Cream	Philippines	shopee.ph	Indonesia	19,3
RDL	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Night Cream	Philippines	shopee.ph	Philippines	18,5
RDL	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Day Cream	Philippines	shopee.ph	Philippines	16,5
Collagen Plus Vit E	Day Cream	Philippines	shopee.ph	N/A	15,9
White Gold	Anti-Marks Cream Extra Brightening	Philippines	shopee.ph	China	15,8
Natural 99	Vitamin E Plus Day Cream	Philippines	shopee.ph	Indonesia	15,3
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Serum (tube)	Philippines	shopee.ph	China	5,3
Chandni	Whitening Cream	Thailand	shopee.co.th	Pakistan	74800
Goree	Beauty Cream with Lycopene	Thailand	shopee.co.th	Pakistan	42400
Faiza	Beauty Cream	Thailand	lazada.co.th	Pakistan	37700
Golden Pearl	Beauty Cream	Thailand	lazada.co.th	Pakistan	34400
Parley	Goldie Advanced Beauty Cream	Thailand	shopee.co.th	Pakistan	34400
O White Extra	Whitening Cream	Thailand	shopee.co.th	Thailand	8514
Jiaoli	bird's nest - Whitening spot-removingscheme suit	Thailand	shopee.co.th	N/A	7388
Jiaobi	Whitening & Moisturizing set - Whitening Night Cream	Thailand	shopee.co.th	N/A	4198
White Rose	Whitening Cream - Super Gold Caviar	Thailand	shopee.co.th	Thailand	3204
Collagen Plus Vit E	Night Cream	Thailand	lazada.co.th	Thailand	2585
White Rose	Whitening Cream - Placenta Sheep Cream	Thailand	shopee.co.th	Thailand	2066
Kim	Whitening Pearl and Snow Lotus Cream	Thailand	shopee.co.th	Korea, South	1498
Kim	Whitening Ginseng and Pearl Cream	Thailand	lazada.co.th	Korea, South	840
White Rose	Whitening Cream	Thailand	lazada.co.th	Thailand	747
Goree	Day & Night Whitening Cream	Thailand	lazada.co.th	Pakistan	581
Jiaoli	Speckle Dispelling & Whitening Cream	Thailand	shopee.co.th	China	436

Arché	Formula AA Pearl Cream	Thailand	shopee.co.th	Thailand	90,6
POP Popular	Curcuma cream	Thailand	shopee.co.th	Thailand	28,9
Sakura	Gluta Speed White	Thailand	shopee.co.th	Thailand	26,6
Jiaobi	Whitening & Moisturizing set - Whitening Make-up Base	Thailand	shopee.co.th	N/A	20
POP Popular	Facial Cream	Thailand	lazada.co.th	Thailand	17,6
Kokliang	Snow Lotus Cream	Thailand	lazada.co.th	Thailand	16,4
Collagen Plus Vit E	Day Cream	Thailand	lazada.co.th	Thailand	14,3
Jiaobi	Whitening & Moisturizing set - Whitening Speckle-Eliminating Facial Cleanser	Thailand	shopee.co.th	N/A	10,2
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Day Cream	Thailand	shopee.co.th	N/A	9,7
<b>Cleo Me'</b>	White - Lemon Formula	Thailand	lazada.co.th	Thailand	6605*
<b>Dr. Japan</b>	Nano	Thailand	shopee.co.th	Thailand	6249*
<b>Hiyadi</b>	Glutathione Cream - White and Bright	Thailand	lazada.co.th	Korea, South	15939*

**Table C3:** Brand and product name of SLPs purchased in the **Caribbean**, country of purchase, e-commerce platform where the samples were purchased, country of origin, and mercury concentration (in ppm). The high-mercury samples (with \*) detected in the Caribbean Region were identified during initial screening with a Skyray Explorer 3000 Restriction Handheld X-Ray Fluorescence, and were then sent to the accredited Quality Assurance and Control Systems (QACS) Lab in Greece for quality assurance analysis using Hydride Atomic Absorption Spectroscopy.

COUNTRY	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONCENTRATION (IN PPM)
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Antigua and Barbuda	ebay.com	Pakistan	32255*
New Face	Beauty Cream	Antigua and Barbuda	ebay.com	Pakistan	8050

**Table C4:** Brand and product name of SLPs purchased in **Europe**, country of purchase, e-commerce platform where the samples were purchased, country of origin, and mercury concentration (in ppm), as determined by Hydride Atomic Absorption Spectroscopy.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
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Papaya	Whitening & Freckle-Eliminating package - Night Cream	Belgium	amazon.com.be	China	4306
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Belgium	amazon.com.be	China	2847
Collagen Plus Vit E	Night Cream	Belgium	befr.ebay.be	N/A	6842
Arché	Formula AA Pearl Cream	Belgium	befr.ebay.be	Thailand	1,46
Collagen Plus Vit E	Day Cream	Belgium	befr.ebay.be	N/A	1,18

**Table C5:** Brand and product name of SLPs purchased in the **USA**, e-commerce platform where the samples were purchased, country of origin, and mercury concentration (in ppm), as determined by Inductively Coupled Plasma Optical Emission Spectroscopy.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
Dr. Yankee	Night Cream (Purple)	United States of America	amazon.com	Thailand	11000
Dr. Yankee	Night Cream (Purple)	United States of America	amazon.com	Thailand	9100
Dr. Yankee	Night Cream (Green)	United States of America	amazon.com	Thailand	9000
Nano Extra White	Whitening Cream with Papaya and Carrot	United States of America	amazon.com	Thailand	8700
Faiza	Beauty Cream	United States of America	amazon.com	Pakistan	7400
Faiza	Beauty Cream	United States of America	amazon.com	Pakistan	7000
Natural Face	Beauty Cream	United States of America	amazon.com	Pakistan	5400
Natural Face	Beauty Cream	United States of America	amazon.com	Pakistan	5400
4K Plus	Whitening Night Cream	United States of America	amazon.com	Thailand	4700
Nunn care	Crema Limpiadora	United States of America	amazon.com	Mexico	1500
Hiyadi	Glutathione Cream - White and Bright	United States of America	amazon.com	Korea, South	160
Kokliang	Snow Lotus Cream	United States of America	amazon.com	Thailand	19
Crusader	Skin Lightening Cream	United States of America	amazon.com	Spain	16
Promina	Ginseng Pearl Cream	United States of America	amazon.com	Thailand	16
African Formula	Skin Lightening Cream	United States of America	amazon.com	Spain	9,7
San ing	Face Cream	United States of America	amazon.com	N/A	7,8
Kojie San	Dream White	United States of America	amazon.com	Philippines	7

Clear N Smooth	Plus HG - Skin brightening cream	United States of America	amazon.com	United States of America	6,6
Jalea Real GRISI	Royal Jelly	United States of America	amazon.com	Mexico	3,9
Dodo	White Up - Lait Revelateur de Teint	United States of America	amazon.com	United Kingdom	2,1
Carotone	Creme B.S.C	United States of America	amazon.com	Côte d'Ivoire	1,9
Yoko	Whitening Spa Salt for Armpit & Bikini Area	United States of America	amazon.com	Thailand	1,5
Navia	Beauty Cream	United States of America	ebay.com	Pakistan	35000
White Gold	Anti-Marks Cream Extra Brightening	United States of America	ebay.com	N/A	27000
White Gold	Anti-Marks Cream Extra Brightening	United States of America	ebay.com	N/A	23000
Goree	Day & Night Beauty Cream	United States of America	ebay.com	Pakistan	22000
Goree	Day & Night Beauty Cream	United States of America	ebay.com	Pakistan	21000
New Face	Beauty Cream	United States of America	ebay.com	Pakistan	20000
Non-Oily Deluxe Silken	Bleaching Cream	United States of America	ebay.com	Jamaica	20000
Face Fresh	Beauty Cream	United States of America	ebay.com	Pakistan	18000
Infocus	Pearl Beauty Cream	United States of America	ebay.com	Pakistan	18000
Non-Oily Deluxe Silken	Bleaching Cream	United States of America	ebay.com	Jamaica	18000
Zuni Gold	Finest Beauty Cream	United States of America	ebay.com	United States of America	18000
Kanza	Beauty Cream	United States of America	ebay.com	China	15000
La Crema de Rebeca		United States of America	ebay.com	N/A	12000
Nunn care	Crema Limpiadora	United States of America	ebay.com	Mexico	7100
Natural Face	Beauty Whitening Cream	United States of America	ebay.com	Pakistan	4400
CCM Cream		United States of America	ebay.com	N/A	4200
BeBe Special Cream		United States of America	ebay.com	N/A	3600
Arché	Formula AA Pearl Cream	United States of America	ebay.com	Thailand	4,5
San Ruby	Beauty Whitening Cream	United States of America	ebay.com	N/A	2,7
Ly-Na	Nourish Face Cream	United States of America	ebay.com	Taiwan	1,4

## 7.4 Annex D—QACS laboratory methodology

The determination of mercury was assessed with atomic absorption spectrometry.

The apparatus was a Perkin Elmer AAnalyst™ 800 Atomic Absorption Spectrometer; equipped with a 4-inch burner head, mercury electrodeless discharge lamp (EDL). FIAS 100 Flow Injection Analysis System for Hydride generation with a quartz cell.

### 1. Parameter settings Hg:

- I. Wavelength 253.7 nm
- II. Lamp current 185.0 mA
  
- III. Slit 0.7 nm High Slit

### 2. FIAS:

- I. FIAS flow (Argon) 100 ml / min.
- II. Carrier solution 3 % (v/v) HCL
- III. Reducing agent 0.2 % NaBH<sub>4</sub> in 0.05% NaOH
- IV. Sample loop 500 µl
- V. Read time 20s

## • For the sample preparation

Accurately weigh, to the nearest mg, 0.35 – 0.50 g of sample into a high-pressure resistance PTFE-TFM microwave digestion vessel. Avoid contact with the side of the vessel. Add 8 ml trace grade nitric acid, 1ml of trace grade hydrogen peroxide by using a graduated pipette. If samples contain talcum or pigment add 1ml of trace grade hydrochloric acid.

Close the vessel lid. Leave for about 15 minutes to ensure complete reaction. Digest in microwave digestion system at the specified program (Organic B).

After the digestion procedure has completed, allow the vessel to cool to room temperature before opening and the sample is transferred into a 50 ml volumetric flask and dilute with distilled water. If necessary, additional dilutions can be performed after this step, to bring the concentration of Mercury within the calibration range. 10 ml of the sample solution is transferred into a 20 ml volumetric flask, 0.2 ml of HCl 37% for trace metal and one to two drops of a 5% solution of KMnO<sub>4</sub> are added and the sample is diluted to volume with water.

## • Standard preparation

Prepare a working stock solution by dissolving 1 ml of the Mercury standard solution 1000mg/L±4mg/L into a 100 ml volumetric flask, dilute to volume with water to give solution A (Hg 10ppm). 1.0 mL of the solution A are transferred into 100 mL volumetric flask and diluted to volume with water to give Solution B (Hg: 100 ppb). 0.1, 0.2, 1.0 and 2.0 ml of the working stock are transferred into 20 ml volumetric flasks. Then 10 ml water are added, followed by 0.2 ml HCl 37% for trace metal and one to two drops of a 5% solution of KMnO<sub>4</sub>, the standards are diluted to volume with water.

## • Blank preparation

Into a 20 ml volumetric flask is placed 15 ml water, 0.5 ml of HCl 37% and one to two drops of 5 % KMnO<sub>4</sub> added and the blank is diluted to volume with water.

## 7.5 Annex E—Sampling protocol – Niton XL3t-970 GOLDD+

All samples purchased from Africa were analysed with this instrument as per the methodology below. About 10% of the samples were further sent to the QACS laboratory for further analysis.

- **1. Type of instrument: Niton XL3t-970 GOLDD+**

The Niton XL3t-970 GOLDD+ instrument is the device that was used to perform the various tests on the cosmetic samples collected in the Africa Hub. The Niton XL3t-970 GOLDD+ XRF instrument is an instrument for quantifying the presence of minerals in a substrate based on wavelength dispersion. It allows real-time quantitative and qualitative observations of the minerals of interest.

The instrument is battery powered and has three basic components: an X-ray source, a detector and a digital pulse processor. The X-ray source is either a radioisotope (e.g.  $^{55}\text{Fe}$ ,  $^{109}\text{Cd}$ ,  $^{241}\text{Am}$ ) or an X-ray tube. Photons from the source illuminate the sample, and the resulting X-ray fluorescence emitted by various elements of the sample is collected by a thermoelectrically cooled solid state detector. A digital pulse processor controls both the energy of the X-rays and their number per unit time. This data is used to generate a spectrum that plots the intensity of the emitted photons (usually in counts per second) against their energy in kiloelectronvolts (keV). The analyser's microprocessor and software convert this information into a near-real-time analysis of the sample's composition (i.e. the elements present and their relative concentrations).

- **2. Sample preparation**

- a. Information about the samples and their packaging was recorded before testing.
- b. The Sample preparation was done using a sample cup with polypropylene film (TF 240 255). Each sample was processed with disposable instruments in such a way as not to contaminate the other samples.
- c. The sample cups were filled in half, to a depth of approximately 2 cm. The diameter of the cup was 3 cm, but window of analysis 8 mm. The filling was the same for all samples as far as the volume allowed.
- d. The creams, depending on their consistency, were collected with a plastic spoon or shaken. Each sample was processed with a non-reusable spoon.
- e. While placed in the cup, the cup was tapped gently to ensure the cream is evenly distributed.

- **3. Analysis**

- a. The analysis mode used is "cosmetic, semi-solid" (which uses a combination of the soil and plastic mode algorithm)
- b. The analysis time was 30 seconds, and each sample was read once.
- c. The analysis results were then extracted into an Excel spreadsheet.



## **7.6 Annex F—Sampling protocol – Skyray Explorer 3000 Restriction on Hazardous Substances (RoHS) Handheld X-Ray Fluorescence**

All samples purchased from Antigua and Barbuda were analysed/screened by the Department of Analytical Services of Antigua and Barbuda with this instrument as per the methodology below. Two of the samples were further sent to the QACS laboratory for further analysis.

- **1.Type of instrument:**

Skyray Explorer 3000 Restriction on Hazardous Substances (RoHS) Handheld X-Ray Fluorescence (Skyray Explorer 3000 RoHS XRF).

- **2. Sample preparation:**

- a. The cream was homogenized using a clean plastic spoon.
- b. Approximately 4 g of cream was weighed out and placed in a 30ml cup.
- c. The cup was placed on the stand over the XRF analysis window.
- d. The cover of the stand was closed before the XRF was engaged for analysis.

- **3. Sample Storage:**

The samples were stored in a room at 21-23°C in a secured location before sample preparation.

- **4. Analyses:**

The samples were analysed in the RoHS mode. Each sample was analysed in triplicate, and the mean concentrations were recorded. As part of the quality control, matrix spikes analysed as reference

## **7.7 Annex G—Sampling protocol - SciAps X-ray Fluorescence Analyzer Model X-200**

All samples purchased from Asia were analysed by QES Technology Philippines Inc. with this instrument as per the methodology below. 10% of the samples were further sent to the QACS laboratory for further analysis.

- **1. Type of instrument:**

SciAps X-ray Fluorescence Analyzer Model X-200.

- **2. Sample preparation and analyses:**

The materials for the analysis of samples include the sample sheets, ruler used to measure the depth and diameter of the creams, plastic spoons used as spreader of the creams on the sheet, gloves, and SciAps X-200 : Handheld XRF Analyzer which is set in RoHS Mode for consumer product applications.

Thin film method was used in the sample preparation of skin whitening creams as in the standard operating procedure for XRF screening of mercury in skin creams. This method was done to avoid the gap between the sample and the sensor of the XRF analyzer which might affect the X-ray penetration and signals from the samples.

In this method, an amount of cream is obtained and spread on the sheet using the spoon so that it becomes a circle of at least 3cm in diameter and the depth of the cream is at least 0.3mm. The skin lightening creams subjected to this method are either (1) observed to be at a lower level of its container, approximately at least 0.5mm from the opening of the container, (2) contained in a plastic tube or (3) contained in a cream jar with opening diameter less than 4cm

## **7.8 Annex H—Sampling protocol – Legend Technical Services Laboratory Methodology (St. Paul, Minnesota)**

### **1. Type of Instrument**

The instrument used for the mercury analysis was an Agilent 5100 ICP-OES (inductively coupled plasma atomic emission spectroscopy).

### **2. Sample Preparation**

1. Weigh out 1g of sample, record weight, and transfer to a pre-labeled digestion vessel;
2. For one sample per batch, weigh out two additional aliquots, one for the MS and one for the MSD;
3. Add 0.125 mL of spike solution to the LCS, LCSD, MS, and MSD;
4. Add 5 mL of 1:1 HNO<sub>3</sub> to all samples, swirl, and cover with a plastic watch glass;
5. Transfer samples in the holding racks to the hotblock digester and reflux for approximately 15 minutes without boiling;
6. Allow the samples to cool, then add 2.5 mL of concentrated HNO<sub>3</sub> and reflux for 30 minutes at 95°C +/- 5°C. Repeat this step until no brown fumes are given off by the samples;
7. Heat sample to a volume of about 5 mL or for 2 hours at 95°C +/- 5°C. Do not allow the samples to boil or go dry. Record the time samples are placed on the hotblock digester;
8. Add 5 mL of concentrated HCl to each sample and cover with a plastic watch glass. Reflux at 95°C +/- 5°C for 15 minutes;
9. After cooling finalize all samples up to 50 mL with DI water using the graduations on the digestion vessels
10. Cap all samples and invert to mix.

### **3. Storage**

The samples were stored in a room at 20-25°C in a secured location before sample preparation.

### **4. Analysis**

The analysis results were then uploaded to the lab's LIMS data management system.

## 7.9 Annex I—Raw data and mercury content: SLPs purchased worldwide

**Table 11:** Brands and product names of SLPs purchased in **Africa**, e-commerce platforms where samples were purchased, country of origin/manufacture according to the packaging, and mercury concentration (ppm) determined by a Niton XL3t-970 GOLDD+ Analyzer SDD XRF. Five of the SLPs (with \*) were analyzed in a lab using Hydride Atomic Absorption Spectroscopy. The lab test results for these SLPs agreed well with the XRF screening results.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
New Face	Beauty Cream	Côte d'Ivoire	ubuy.ci	Pakistan	19194,81
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Côte d'Ivoire	ubuy.ci	China	6750*
Chandni	Whitening Cream	Kenya	jumia.co.ke	Pakistan	25339,74
Zuni Gold	Finest Beauty Cream	Kenya	jumia.co.ke	United States of America	19237,46
White Gold	Anti-Marks Cream Extra Brightening	Kenya	jiji.co.ke	N/A	18237,64
New Face	Beauty Cream	Kenya	jiji.co.ke	Pakistan	15801,46
Noor	Herbal Beauty Cream	Kenya	jumia.co.ke	Pakistan	15679,41
Noor Gold	Beauty Cream	Kenya	jiji.co.ke	Pakistan	15676,5
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Kenya	kilimall.co.ke	Pakistan	13637,33
Parley	Goldie Advanced Beauty Cream	Kenya	jumia.co.ke	Pakistan	13278,14
Golden Pearl	Beauty Cream	Kenya	jiji.co.ke	Pakistan	12749,79
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Kenya	jumia.co.ke	China	12035,46
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Kenya	jumia.co.ke	China	11838,88
Faiza	Beauty Cream	Kenya	jumia.co.ke	Pakistan	9060,74
Dr. Japan	Nano	Kenya	jiji.co.ke	N/A	5663*
Dr. Japan	Nano Soap	Kenya	jiji.co.ke	N/A	<LOD
Perlay	Goldie Hand and Body Cream	Kenya	jiji.co.ke	Pakistan	<LOD
Chandni	Whitening Cream	Nigeria	jumia.com.ng	Pakistan	20933
Aneeza Gold	Beauty Cream	Nigeria	jiji.ng	Pakistan	20008,67
Goree	Day & Night Whitening Cream	Nigeria	jiji.ng	Pakistan	19742,72
Parley	Beauty Cream	Nigeria	jumia.com.ng	Pakistan	13828,93

Zuni Gold	Finest Beauty Cream	Nigeria	jumia.com.ng	United States of America	11382,08
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Nigeria	jumia.com.ng	China	8049*
Infocus	Pearl Beauty Cream	Nigeria	jiji.ng	Pakistan	7524,14
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Nigeria	jumia.com.ng	China	2995,17
Egg White & Cherry	7 Days Specific Eliminating Freckle Whitening Cream - Night Cream	Nigeria	jiji.ng	Taiwan	12,54
Egg White & Cherry	7 Days Specific Eliminating Freckle Whitening Cream - Day Cream	Nigeria	jiji.ng	Taiwan	<LOD
Parley	Goldie Advanced Beauty Cream	Nigeria	konga.com	Pakistan	<LOD
Perlay	Goldie Hand and Body Cream	Nigeria	konga.com	Pakistan	<LOD
POP Popular	Facial Cream	Nigeria	konga.com	China	<LOD
Noor Gold	Beauty Cream	South Africa	bidorbuy.co.za	Pakistan	24248*
Goree	Day & Night Whitening Cream	South Africa	bidorbuy.co.za	Pakistan	18556,45
White Gold	Anti-Marks Cream Extra Brightening	South Africa	bidorbuy.co.za	Pakistan	15414,22
Noor	Herbal Beauty Cream	South Africa	bidorbuy.co.za	Pakistan	8720,23
Parley	Beauty Cream	Uganda	jiji.ug	Pakistan	13380,08
Faiza	Beauty Cream	Uganda	jiji.ug	Pakistan	9251,62
Papaya	Whitening & Freckle-Eliminating package	Uganda	jiji.ug	China	5153,37
Natural Face	Beauty Cream	Uganda	jiji.ug	Pakistan	3598,51
Kanza	Beauty Cream	Uganda	jiji.ug	Pakistan	1,69*
Chandni	Whitening Cream	Uganda	jiji.ug	Pakistan	<LOD
Golden Pearl	Beauty Cream	Uganda	jiji.ug	Pakistan	<LOD
Goree	Beauty Cream with Lycopene	Uganda	jiji.ug	Pakistan	<LOD
Noor	Herbal Beauty Cream	Uganda	jiji.ug	Pakistan	<LOD

**Table 12:** Brands and product names of SLPs purchased in **Asia**, e-commerce platforms where samples were purchased, country of origin/manufacture according to the packaging, and mercury concentration (ppm) as determined by a SciAps X-ray Fluorescence Analyzer Model X-200. Eleven of the SLPs (with \*)

were analyzed in a lab using Hydride Atomic Absorption Spectroscopy. The test results in this table should be considered as indicative results showing presence or not of mercury, and should not be interpreted as absolute values.

<b>BRAND NAME</b>	<b>PRODUCT NAME</b>	<b>COUNTRY OF PURCHASE</b>	<b>OF</b>	<b>E-COMMERCE</b>	<b>COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING</b>	<b>MERCURY CONTENT (IN PPM)</b>
<b>Due</b>	Beauty Cream	Bangladesh		Kablewala.com.bd	Pakistan	43700
<b>Sandal</b>	Whitening Beauty Cream	Bangladesh		daraz.com.bd	Pakistan	39900
<b>Golden Pearl</b>	Beauty Cream	Bangladesh		daraz.com.bd	Pakistan	37400
<b>Papaya</b>	Whitening & Freckle-Eliminating package - Day Cream	Bangladesh		daraz.com.bd	China	4949
<b>Jiaoli</b>	bird's nest - Whitening spot-removingscheme suit	Bangladesh		daraz.com.bd	China	4034
<b>Papaya</b>	Whitening & Freckle-Eliminating package - Night Cream	Bangladesh		daraz.com.bd	China	3740
<b>Kim</b>	Whitening Pearl and Snow Lotus Cream	Bangladesh		daraz.com.bd	N/A	2480
<b>POP Popular</b>	Facial Cream	Bangladesh		daraz.com.bd	Thailand	2385*
<b>Stillman's</b>	Skin Bleach Cream	Bangladesh		daraz.com.bd	United States of America	810
<b>Collagen Plus Vit E</b>	Night Cream	Bangladesh		daraz.com.bd	N/A	803
<b>Arché</b>	Formula AA Pearl Cream	Bangladesh		daraz.com.bd	Thailand	127,7
<b>Collagen Plus Vit E</b>	Day Cream	Bangladesh		daraz.com.bd	N/A	19,1
<b>Green Tea</b>	seven-day - Whitening Anti-Freckle Cream	Bangladesh		daraz.com.bd	Taiwan	15
<b>Egg White &amp; Cherry</b>	7 days specific eliminating freckle whitening cream	Bangladesh		Kablewala.com.bd	Taiwan	6,4
<b>Lata Herbal</b>	Skin Bright Cream	Bangladesh		daraz.com.bd	Bangladesh	<0,4*
<b>Chandni</b>	Whitening Cream	India		amazon.in	Pakistan	73200
<b>Goree</b>	Beauty Cream with Lycopene	India		amazon.in	Pakistan	66300
<b>Goree</b>	Day & Night Whitening Cream	India		amazon.in	Pakistan	58000
<b>Sandal</b>	Whitening Beauty Cream	India		flipkart.com	Pakistan	54000
<b>Due</b>	Beauty Cream	India		amazon.in	India	50300
<b>Gluta White</b>	Skin Whitening Cream - Advanced Glutathione Formula	India		flipkart.com	United States of America	49300

<b>Noor</b>	Gold Beauty Cream	India	flipkart.com	Pakistan	44200
<b>New Face</b>	Beauty Cream	India	flipkart.com	Pakistan	43700
<b>Golden Pearl</b>	Beauty Cream	India	amazon.in	Pakistan	38000
<b>Face Fresh</b>	Beauty Cream	India	flipkart.com	Pakistan	37500
<b>Faiza</b>	Beauty Cream	India	amazon.in	Pakistan	30400
<b>Face Fresh</b>	Gold Beauty Cream	India	amazon.in	Pakistan	27700
<b>Egg White &amp; Cherry</b>	7 days specific eliminating freckle whitening cream	India	amazon.in	Taiwan	3438
<b>Collagen Plus Vit E</b>	Night Cream	India	amazon.in	N/A	2789*
<b>Natural Face</b>	Beauty Cream	India	flipkart.com	Pakistan	735*
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Night Cream	India	flipkart.com	N/A	1177
<b>Arché</b>	Formula AA Pearl Cream	India	amazon.in	Thailand	78,6
<b>Jiaobi</b>	BB Cream Skin Whitening Mate	India	flipkart.com	N/A	15,6
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Day Cream	India	flipkart.com	N/A	10,3
<b>Collagen Plus Vit E</b>	Day Cream	India	amazon.in	N/A	1,7
<b>Kanza</b>	Beauty Cream	India	amazon.in	Pakistan	1,7
<b>Goree</b>	Day & Night Whitening Cream	Indonesia	shopee.co.id	Pakistan	64700
<b>Due</b>	Beauty Cream	Indonesia	shopee.co.id	Pakistan	48000
<b>Golden Pearl</b>	Beauty Cream	Indonesia	tokopedia.com	Pakistan	43600
<b>Chandni</b>	Whitening Cream	Indonesia	tokopedia.com	United Arab Emirates	40500
<b>Goree</b>	Beauty Cream with Lycopene	Indonesia	shopee.co.id	Pakistan	38700
<b>Kim</b>	Whitening Pearl and Snow Lotus Cream	Indonesia	shopee.co.id	Thailand	25362*
<b>Faiza</b>	Beauty Cream	Indonesia	bukalapak.com	Pakistan	15208*
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Night Cream	Indonesia	bukalapak.com	China	10300

<b>Collagen Plus Vit E</b>	Night Cream	Indonesia	bukalapak.com	N/A	3990
<b>Temulawak</b>	New - Day & Night Cream - Beauty Whitening - Night Cream	Indonesia	bukalapak.com	Malaysia	2128
<b>Temulawak</b>	New - Day & Night Cream - Beauty Whitening - Day Cream	Indonesia	bukalapak.com	Malaysia	27,6
<b>Erna</b>	Whitening Cream	Indonesia	shopee.co.id	N/A	14,1
<b>Natural 99</b>	Vitamin E Plus Night Cream	Indonesia	shopee.co.id	N/A	14,1
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Make-up Base	Indonesia	bukalapak.com	China	9,4
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Day Cream	Indonesia	bukalapak.com	China	8,2
<b>Jiaobi</b>	Whitening & Moisturizing set - Flawless Whitening Essence	Indonesia	bukalapak.com	China	6,2
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Speckle-Eliminating Facial Cleanser	Indonesia	bukalapak.com	China	5,6
<b>Natural 99</b>	Vitamin E Plus Day Cream	Indonesia	shopee.co.id	N/A	2,8
<b>RDL</b>	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Day Cream	Indonesia	tokopedia.com	Philippines	2,1
<b>Collagen Plus Vit E</b>	Day Cream	Indonesia	bukalapak.com	N/A	1,7
<b>RDL</b>	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Night Cream	Indonesia	tokopedia.com	Philippines	1,3
<b>Goree</b>	Day & Night Whitening Cream	Philippines	shopee.ph	Pakistan	69900
<b>Goree</b>	Beauty Cream with Lycopene	Philippines	shopee.ph	Pakistan	49200
<b>Faiza</b>	Beauty Cream	Philippines	shopee.ph	Pakistan	37000
<b>Parley</b>	Goldie Advanced Beauty Cream	Philippines	shopee.ph	Pakistan	31895*
<b>Papaya</b>	Whitening & Freckle-Eliminating package - Day Cream	Philippines	shopee.ph	China	13700
<b>Cleo Me'</b>	White - Lemon Formula	Philippines	shopee.ph	Thailand	4801
<b>Hiyadi</b>	Glutathione Cream - White and Bright	Philippines	shopee.ph	Thailand	3493
<b>Papaya</b>	Whitening & Freckle-Eliminating package - Night Cream	Philippines	shopee.ph	China	2813
<b>O White Extra</b>	Whitening Cream	Philippines	shopee.ph	Thailand	2651



<b>Collagen Plus Vit E</b>	Night Cream	Philippines	shopee.ph	N/A	2529
<b>Kim</b>	Whitening Ginseng and Pearl Cream	Philippines	shopee.ph	Korea, South	1458
<b>Kim</b>	Whitening Pearl and Snow Lotus Cream	Philippines	shopee.ph	Korea, South	1150
<b>Jiaoli</b>	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Night	Philippines	shopee.ph	China	1043
<b>Stillman's</b>	Skin Bleach Cream	Philippines	shopee.ph	United States of America	805
<b>White Rose</b>	Whitening Cream	Philippines	shopee.ph	Thailand	747
<b>Jiaoli</b>	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Day	Philippines	shopee.ph	China	718
<b>Arché</b>	Formula AA Pearl Cream	Philippines	shopee.ph	Thailand	137
<b>POP Popular</b>	Facial Cream	Philippines	shopee.ph	Thailand	24,1
<b>Natural 99</b>	Vitamin E Plus Night Cream	Philippines	shopee.ph	Indonesia	19,3
<b>RDL</b>	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Night Cream	Philippines	shopee.ph	Philippines	18,5
<b>RDL</b>	Whitening Treatment - Day and Night Cream - 8 Days Treatment - Day Cream	Philippines	shopee.ph	Philippines	16,5
<b>Collagen Plus Vit E</b>	Day Cream	Philippines	shopee.ph	N/A	15,9
<b>White Gold</b>	Anti-Marks Cream Extra Brightening	Philippines	shopee.ph	China	15,8
<b>Natural 99</b>	Vitamin E Plus Day Cream	Philippines	shopee.ph	Indonesia	15,3
<b>Jiaoli</b>	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Serum (tube)	Philippines	shopee.ph	China	5,3
<b>Kokliang</b>	Snow Lotus Cream	Philippines	shopee.ph	Thailand	0,68*
<b>Chandni</b>	Whitening Cream	Thailand	shopee.co.th	Pakistan	74800
<b>Goree</b>	Beauty Cream with Lycopene	Thailand	shopee.co.th	Pakistan	42400
<b>Faiza</b>	Beauty Cream	Thailand	lazada.co.th	Pakistan	37700
<b>Golden Pearl</b>	Beauty Cream	Thailand	lazada.co.th	Pakistan	34400
<b>Parley</b>	Goldie Advanced Beauty Cream	Thailand	shopee.co.th	Pakistan	34400
<b>Hiyadi</b>	Glutathione Cream - White and Bright	Thailand	lazada.co.th	Korea, South	15939*
<b>O White Extra</b>	Whitening Cream	Thailand	shopee.co.th	Thailand	8514

<b>Jiaoli</b>	bird's nest - Whitening spot-removingscheme suit	Thailand	shopee.co.th	N/A	7388
<b>Cleo Me'</b>	White - Lemon Formula	Thailand	lazada.co.th	Thailand	6605*
<b>Dr. Japan</b>	Nano	Thailand	shopee.co.th	Thailand	6249*
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Night Cream	Thailand	shopee.co.th	N/A	4198
<b>White Rose</b>	Whitening Cream - Super Gold Caviar	Thailand	shopee.co.th	Thailand	3204
<b>Collagen Plus Vit E</b>	Night Cream	Thailand	lazada.co.th	Thailand	2585
<b>White Rose</b>	Whitening Cream - Placenta Sheep Cream	Thailand	shopee.co.th	Thailand	2066
<b>Kim</b>	Whitening Pearl and Snow Lotus Cream	Thailand	shopee.co.th	Korea, South	1498
<b>Kim</b>	Whitening Ginseng and Pearl Cream	Thailand	lazada.co.th	Korea, South	840
<b>White Rose</b>	Whitening Cream	Thailand	lazada.co.th	Thailand	747
<b>Goree</b>	Day & Night Whitening Cream	Thailand	lazada.co.th	Pakistan	581
<b>Jiaoli</b>	Speckle Dispelling & Whitening Cream	Thailand	shopee.co.th	China	436
<b>Arché</b>	Formula AA Pearl Cream	Thailand	shopee.co.th	Thailand	90,6
<b>POP Popular</b>	Curcuma cream	Thailand	shopee.co.th	Thailand	28,9
<b>Sakura</b>	Gluta Speed White	Thailand	shopee.co.th	Thailand	26,6
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Make-up Base	Thailand	shopee.co.th	N/A	20
<b>POP Popular</b>	Facial Cream	Thailand	lazada.co.th	Thailand	17,6
<b>Kokliang</b>	Snow Lotus Cream	Thailand	lazada.co.th	Thailand	16,4
<b>Collagen Plus Vit E</b>	Day Cream	Thailand	lazada.co.th	Thailand	14,3
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Speckle-Eliminating Facial Cleanser	Thailand	shopee.co.th	N/A	10,2
<b>Jiaobi</b>	Whitening & Moisturizing set - Whitening Day Cream	Thailand	shopee.co.th	N/A	9,7

**Table 13:** Brands and product names of SLPs purchased in the **Caribbean**, e-commerce platforms where samples were purchased, country of origin/manufacture according to the packaging, and mercury concentration (ppm). The high-mercury samples (with \*) shown in this table were initially identified by screening with a Skyray Explorer 3000 Restriction on Hazardous Substances (RoHS) Handheld X-Ray Fluorescence. Then, they were sent to the accredited Quality Assurance and Control Systems (QACS) Lab in Greece for quality assurance analysis using Hydride Atomic Absorption Spectroscopy.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONCENTRATION (IN PPM)
Aneza Gold	Beauty Cream with Avocado & Aloe Vera	Antigua and Barbuda	ebay.com	Pakistan	32255*
New Face	Beauty Cream	Antigua and Barbuda	ebay.com	Pakistan	8050
Temulawak	Day & Night Cream - Beauty Whitening Cream - Night Cream	Antigua and Barbuda	ebay.com	Indonesia	0,51*
Temulawak	Day & Night Cream - Beauty Whitening Cream - Day Cream	Antigua and Barbuda	ebay.com	Indonesia	0,1

**Table 14:** Brands and product names of SLPs purchased in **Europe**, e-commerce platforms where samples were purchased, country of origin/manufacture according to the packaging, and mercury concentration (ppm) as determined by Hydride Atomic Absorption Spectroscopy.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
Papaya	Whitening & Freckle-Eliminating package - Night Cream	Belgium	amazon.com.be	China	4306
Papaya	Whitening & Freckle-Eliminating package - Day Cream	Belgium	amazon.com.be	China	2847
Kanza	Beauty Cream	Belgium	amazon.com.be	China	<0.02
Livépro	Beauty Cream with Lycopene	Belgium	amazon.fr	China	0,02
Collagen Plus Vit E	Night Cream	Belgium	befr.ebay.be	N/A	6842
Bio Claire	Crème corporelle clarifiante Bio-Végétal Naturel	Belgium	befr.ebay.be	N/A	<0.02
Arché	Formula AA Pearl Cream	Belgium	befr.ebay.be	Thailand	1,46
Collagen Plus Vit E	Day Cream	Belgium	befr.ebay.be	N/A	1,18

**Table 15:** Brands and product names of SLPs purchased in the **USA**, e-commerce platforms where samples were purchased, country of origin/manufacture according to the packaging, and mercury concentration (ppm) as determined by Inductively Coupled Plasma Optical Emission Spectroscopy.

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE	COUNTRY OF ORIGIN/MANUFACTURE AS PER PACKAGING	MERCURY CONTENT (IN PPM)
Dr. Yankee	Night Cream (Purple)	United States of America	amazon.com	Thailand	11000
Dr. Yankee	Night Cream (Purple)	United States of America	amazon.com	Thailand	9100
Dr. Yankee	Night Cream (Green)	United States of America	amazon.com	Thailand	9000
Nano Extra White	Whitening Cream with Papaya and Carrot	United States of America	amazon.com	Thailand	8700
Faiza	Beauty Cream	United States of America	amazon.com	Pakistan	7400
Faiza	Beauty Cream	United States of America	amazon.com	Pakistan	7000
Natural Face	Beauty Cream	United States of America	amazon.com	Pakistan	5400
Natural Face	Beauty Cream	United States of America	amazon.com	Pakistan	5400
4K Plus	Whitening Night Cream	United States of America	amazon.com	Thailand	4700
Nunn care	Crema Limpiadora	United States of America	amazon.com	Mexico	1500
Hiyadi	Glutathione Cream - White and Bright	United States of America	amazon.com	Korea, South	160
Kokliang	Snow Lotus Cream	United States of America	amazon.com	Thailand	19
Crusader	Skin Lightening Cream	United States of America	amazon.com	Spain	16
Promina	Ginseng Pearl Cream	United States of America	amazon.com	Thailand	16
African Formula	Skin Lightening Cream	United States of America	amazon.com	Spain	9,7
San ing	Face Cream	United States of America	amazon.com	N/A	7,8
Kojie San	Dream White	United States of America	amazon.com	Philippines	7
Clear N Smooth	Plus HG - Skin brightening cream	United States of America	amazon.com	United States of America	6,6
Jalea Real GRISI	Royal Jelly	United States of America	amazon.com	Mexico	3,9
Dodo	White Up - Lait Revelateur de Teint	United States of America	amazon.com	United Kingdom	2,1
Carotone	Creme B.S.C	United States of America	amazon.com	Côte d'Ivoire	1,9
Yoko	Whitening Spa Salt for Armpit & Bikini Area	United States of America	amazon.com	Thailand	1,5
Dr. Yankee	Day Cream (Purple)	United States of America	amazon.com	Thailand	<0,5

Dr. Yankee	Day Cream (Purple)	United States of America	amazon.com	Thailand	<0,5
Dr. Yankee	Day Cream (Green)	United States of America	amazon.com	Thailand	<0,5
Navia	Beauty Cream	United States of America	ebay.com	Pakistan	35000
White Gold	Anti-Marks Cream Extra Brightening	United States of America	ebay.com	N/A	27000
White Gold	Anti-Marks Cream Extra Brightening	United States of America	ebay.com	N/A	23000
Goree	Day & Night Beauty Cream	United States of America	ebay.com	Pakistan	22000
Goree	Day & Night Beauty Cream	United States of America	ebay.com	Pakistan	21000
New Face	Beauty Cream	United States of America	ebay.com	Pakistan	20000
Non-Oily Deluxe Silken	Bleaching Cream	United States of America	ebay.com	Jamaica	20000
Face Fresh	Beauty Cream	United States of America	ebay.com	Pakistan	18000
Infocus	Pearl Beauty Cream	United States of America	ebay.com	Pakistan	18000
Non-Oily Deluxe Silken	Bleaching Cream	United States of America	ebay.com	Jamaica	18000
Zuni Gold	Finest Beauty Cream	United States of America	ebay.com	United States of America	18000
Kanza	Beauty Cream	United States of America	ebay.com	China	15000
La Crema de Rebeca		United States of America	ebay.com	N/A	12000
Nunn care	Crema Limpiadora	United States of America	ebay.com	Mexico	7100
Natural Face	Beauty Whitening Cream	United States of America	ebay.com	Pakistan	4400
CCM Cream		United States of America	ebay.com	N/A	4200
BeBe Special Cream		United States of America	ebay.com	N/A	3600
Arché	Formula AA Pearl Cream	United States of America	ebay.com	Thailand	4,5
San Ruby	Beauty Whitening Cream	United States of America	ebay.com	N/A	2,7
Ly-Na	Nourish Face Cream	United States of America	ebay.com	Taiwan	1,4
Espinicida Voam		United States of America	ebay.com	N/A	<0,5
Qasil Powder	with Turmeric - Face Mask	United States of America	ebay.com	United States of America	<0,5

## 7.10 Annex J—Raw data: Suspect SLPs screened, but not purchased

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	E-COMMERCE
Aneeza Gold	Beauty Cream	Jordan	jordan.desertcart.com
Aneeza Gold	Beauty Cream	Nigeria	konga.com
Aneeza Gold	Beauty Cream	Uganda	jiji.ug
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Jordan	jordan.desertcart.com
Aneeza Gold	Beauty Cream with Avocado & aloe vera	Kenya	jiji.co.ke
Arché	Formula AA Pearl Cream	Antigua and Barbuda	ebay.com
Arché	Formula AA Pearl Cream	Jordan	jordan.desertcart.com
Arché	Formula AA Pearl Cream	Mexico	amazon.com.mx
Arché	Formula AA Pearl Cream	Mexico	articulo.mercadolibre.com.mx
Arché	Formula AA Pearl Cream	Thailand	lazada.co.th
BeBe Special Cream		Antigua and Barbuda	ebay.com
Bio Claire	Creme corporelle eclaircissante sans hydroquinone	Belgium	ebay.be
CCM Cream	Anti-melasma dark-spots cream	Antigua and Barbuda	ebay.com
Chandni	Whitening Cream	Indonesia	shopee.co.id
Chandni	Whitening cream	Kenya	jiji.co.ke
Chandni	Whitening cream	Kenya	kilimall.co.ke
Chandni	Whitening Cream	Philippines	lazada.com.ph
Chandni	Whitening Cream	Uganda	jumia.ug
Clear Essence	Beauty Cream	Uganda	jiji.ug
Clear Essence	Beauty Cream	Uganda	jumia.ug
Cleo Me'	White - Lemon Formula	Thailand	shopee.co.th
Collagen Plus Vit E	Day & Night Cream	Indonesia	tokopedia.com
Collagen Plus Vit E	Day & Night Cream	Indonesia	shopee.co.id
Collagen Plus Vit E	Day and Night Cream	Antigua and Barbuda	ebay.com
Collagen Plus Vit E	Day and Night Cream	India	flipkart.com
Collagen Plus Vit E	Day and night cream	Kenya	jiji.co.ke
Collagen Plus Vit E	Day and Night Cream	Kenya	jumia.com

Collagen Plus Vit E	Day and Night Cream	Mexico	articulo.mercadolibre.com.mx
Collagen Plus Vit E	Day and night cream	Philippines	shopee.ph
Collagen Plus Vit E	day cream	Thailand	shopee.co.th
Collagen Plus Vit E	night cream	Thailand	shopee.co.th
Crusader	Medicated Soap	Belgium	ebay.be
Daggett & Ramsdell	Hand & Body Lightening cream	Belgium	ebay.be
Dr. Japan	Nano	Indonesia	tokopedia.com
Dr. Japan	Nano	Thailand	lazada.co.th
Dr. Japan	Nano	Uganda	jiji.ug
Dr. Japan	Nano	Uganda	jumia.ug
Due	Beauty Cream	India	flipkart.com
Due	Beauty Cream	Indonesia	tokopedia.com
Due	Beauty Cream	Jordan	jordan.desertcart.com
Egg White & Cherry	7 Days Specific Eliminating Freckle Whitening Cream	India	flipkart.com
Egg White & Cherry	7 Days Specific Eliminating Freckle Whitening Cream	Nigeria	jiji.ng
Erna	Whitening Cream	Indonesia	bukalapak.com
Erna	Whitening Cream	Indonesia	tokopedia.com
Face Fresh	Beauty Cream	Jordan	jordan.desertcart.com
Face fresh	Gold beauty cream	India	flipkart.com
Face Fresh Plus	Gold Beauty Cream	Côte d'Ivoire	jumia.ci
Face Fresh Plus	Gold beauty cream	Jordan	jordan.desertcart.com
Fadeout Night	Beauty Cream	Uganda	jiji.ug
Faiza	Beauty Cream	India	flipkart.com
Faiza	Beauty Cream	Indonesia	tokopedia.com
Faiza	Beauty Cream	Indonesia	shopee.co.id
Faiza	Beauty cream	Kenya	jiji.co.ke
Faiza	Beauty Cream	Mexico	amazon.com
Faiza	Beauty Cream	Thailand	shopee.co.th
Faiza	Beauty Cream	Uganda	jiji.ug
Flori's Duo	With Pure Argan Oil Facial Cream	Belgium	ebay.be

Golden Pearl	Beauty Cream	Indonesia	bukalapak.com
Golden Pearl	Beauty Cream	Indonesia	shopee.co.id
Golden Pearl	Beauty Cream	Jordan	jordan.desertcart.com
Golden Pearl	Beauty Cream	Jordan	jordan.desertcart.com
Golden Pearl	Beauty Cream	Kenya	jumia.com
Golden Pearl	Beauty Cream	Philippines	shopee.ph
Golden Pearl	Beauty Cream	Thailand	shopee.co.th
Goree	Beauty Cream with Lycopene	Indonesia	tokopedia.com
Goree	Beauty Cream with Lycopene	Jordan	jordan.desertcart.com
Goree	Beauty Cream with Lycopene	Jordan	jordan.desertcart.com
Goree	Beauty Cream with Lycopene	Kenya	jiji.co.ke
Goree	Beauty Cream with Lycopene	Philippines	lazada.com.ph
Goree	Beauty Cream with Lycopene	Thailand	lazada.co.th
Goree	Day & Night Whitening Cream	Indonesia	bukalapak.com
Goree	Day & Night Whitening Cream	Indonesia	tokopedia.com
Goree	Day & Night Whitening Cream	Jordan	jordan.desertcart.com
Goree	Day & Night Whitening Cream	Philippines	shopee.ph
Goree	Day & Night Whitening Cream	Thailand	shopee.co.th
Goree	Day and Night Cream	Nigeria	jumia.com.ng
Goree	Day and Night Cream	Nigeria	konga.com
Gorgeous	Beauty Cream	Uganda	jiji.ug
Hiyadi	Glutathione Cream - White and Bright	Antigua and Barbuda	ebay.com
Hiyadi	Glutathione Cream - White and Bright	Côte d'Ivoire	jumia.ci
Hiyadi	Glutathione Cream - White and Bright	Mexico	amazon.com
Hiyadi	Glutathione Cream - White and Bright	Thailand	shopee.co.th
Infocus	Pearl Beauty Cream	Kenya	jiji.co.ke
Infocus	Pearl Beauty Cream	Nigeria	jumia.com.ng
Jiaobi	Whitening & Moisturizing set	Indonesia	tokopedia.com
Jiaobi	Whitening & Moisturizing set	Indonesia	shopee.co.id
Jiaobi	Whitening & Moisturizing set	Jordan	jordan.desertcart.com



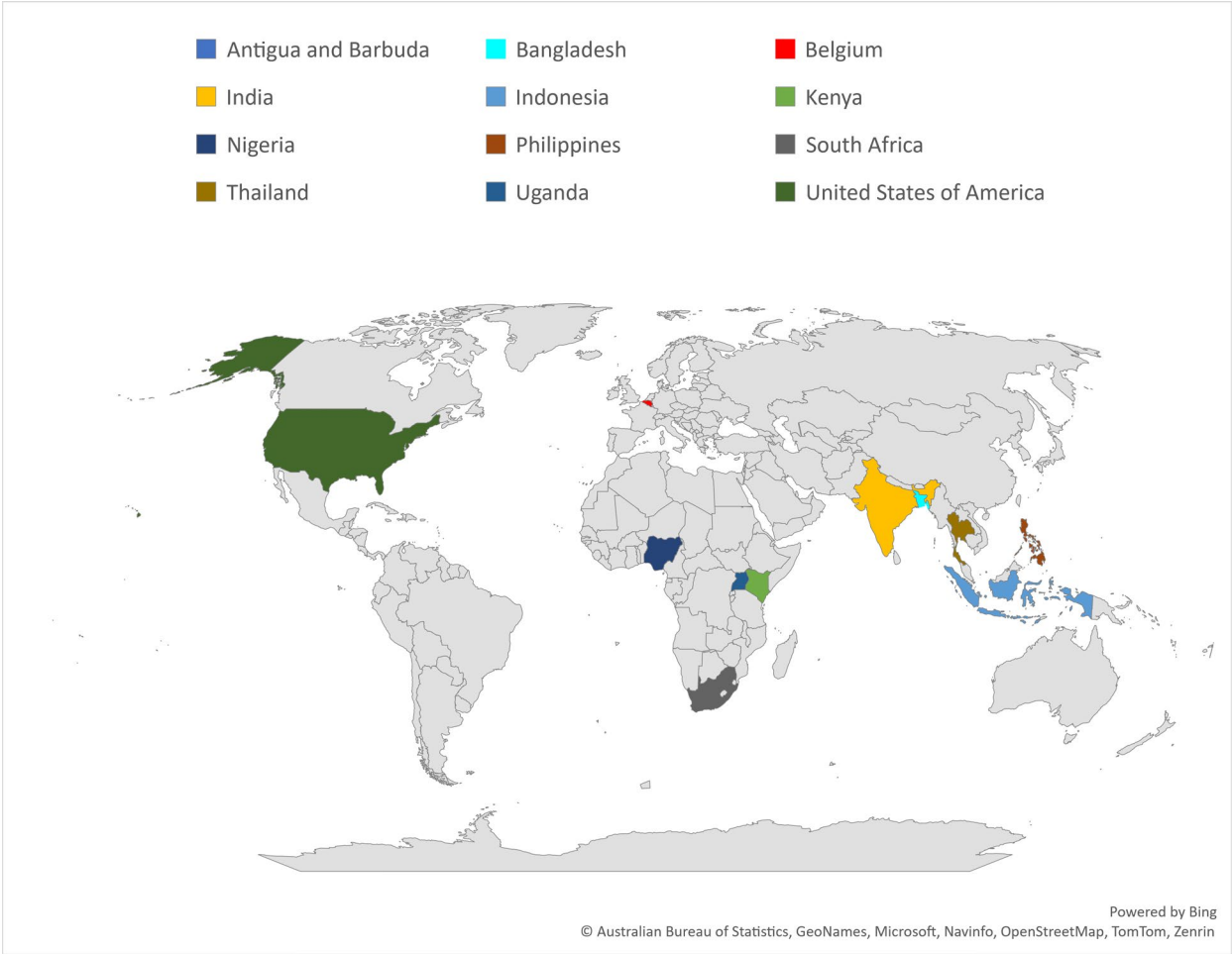
Jiaobi	Whitening & Moisturizing set	Jordan	amazon.ae
Jiaobi	Whitening & Moisturizing set	Philippines	lazada.com.ph
Jiaobi	Whitening & Moisturizing set	Philippines	shopee.ph
Jiaoli	bird's nest - Whitening spot-removingscheme suit	Philippines	shopee.ph
JiaoLi	HuiChuSu Face Cream 7 Day Specific Eliminating Freckle	Philippines	lazada.com.ph
Jiaoli	HuiChuSu Miraculous Cream	Philippines	shopee.ph
Jiaoli	HuiChuSu Miraculous Cream	Thailand	shopee.co.th
Kanza	Beauty Cream	Belgium	amazon.fr
Kanza	Beauty Cream	Belgium	Amazon.com.be
Kanza	Beauty Cream	Belgium	amazon.de
Kanza	beauty cream	India	flipkart.com
Kanza	Beauty Cream	Jordan	jordan.desertcart.com
Kanza	Beauty Cream	Jordan	jordan.desertcart.com
Kanza	Beauty Cream	Jordan	amazon.ae
Kanza	Beauty Cream	Kenya	jiji.co.ke
Kim	Whitening Ginseng and Pearl Cream	Thailand	shopee.co.th
Kim	Whitening Pearl and Snow Lotus Cream	Nigeria	jiji.ng
Kim	Whitening Pearl and Snow Lotus Cream	Philippines	lazada.com.ph
Kim	Whitening Pearl and Snow Lotus Cream	Thailand	lazada.co.th
Kojie San	Skin lightening face cream with HydroMoist	Belgium	ebay.be
Kokliang	Snow Lotus Cream	Antigua and Barbuda	amazon.com
Kokliang	Snow Lotus Cream	Côte d'Ivoire	jumia.ci
Kokliang	Snow Lotus Cream	Mexico	amazon.com
kokliang	Snow Lotus Cream	Thailand	shopee.co.th
La Crema de Rebeca		Mexico	articulo.mercadolibre.com.mx
La Tia Mana	Crema Limpiadora Y Curativa	Mexico	articulo.mercadolibre.com.mx
Lemon Clear	Beauty Cream	Uganda	jiji.ug
Natural 99	Vitamin E Plus Day & Night Cream	Indonesia	tokopedia.com
Natural 99	Vitamin E Plus Day Cream	Indonesia	bukalapak.com
Natural 99	Vitamin E Plus Night Cream	Indonesia	bukalapak.com

Natural Face	Beauty Cream	Antigua and Barbuda	ebay.com
Natural Face	Beauty Cream	Côte d'Ivoire	jumia.ci
Natural Face	Beauty Cream	Uganda	jiji.ug
New face	Beauty Cream	Kenya	jumia.com
New Face	Whitening cream	Jordan	jordan.desertcart.com
New Face	Whitening Cream	Jordan	jordan.desertcart.com
New Face	Whitening Cream	Kenya	jiji.co.ke
Non-Oily Deluxe Silken	Bleaching Cream	Antigua and Barbuda	ebay.com
Non-Oily Deluxe Silken	Bleaching Cream	Côte d'Ivoire	jumia.ci
Noor	Herbal Beauty Cream	Jordan	jordan.desertcart.com
Noor	Herbal beauty cream	Kenya	jiji.co.ke
Noor Gold	Beauty Cream	Jordan	jordan.desertcart.com
Noor Gold	Beauty Cream	Kenya	jumia.com
Noor Gold	Beauty Cream	Uganda	jiji.ug
Nunn Care	Crema Limpiadora	Antigua and Barbuda	ebay.com
Nunn Care	Crema Limpiadora	Belgium	ebay.be
Nunn Care	Crema Limpiadora	Côte d'Ivoire	jumia.ci
Nunn Care	Crema Limpiadora	Jordan	jordan.desertcart.com
Nunn Care	Crema Limpiadora	Mexico	amazon.com.mx
Nunn Care	Crema Limpiadora	Mexico	articulo.mercadolibre.com.mx
O White Extra	Whitening Cream	Antigua and Barbuda	ebay.com
O White Extra	Whitening Cream	Belgium	ebay.be
O'Tentika	Fade Out Cream	Belgium	ebay.be
O'Tentika	Fade out cream	Belgium	Amazon.com.be
Papaya	Whitening & Freckle-Eliminating package	Antigua and Barbuda	ebay.com
Papaya	Whitening & Freckle-Eliminating package	Belgium	amazon.fr
Papaya	Whitening & Freckle-Eliminating package	Belgium	Amazon.com.be
Papaya	Whitening & Freckle-Eliminating package	Belgium	amazon.de
Papaya	Whitening & Freckle-Eliminating package	Jordan	jordan.desertcart.com
Papaya	Whitening & Freckle-Eliminating package	Jordan	amazon.ae

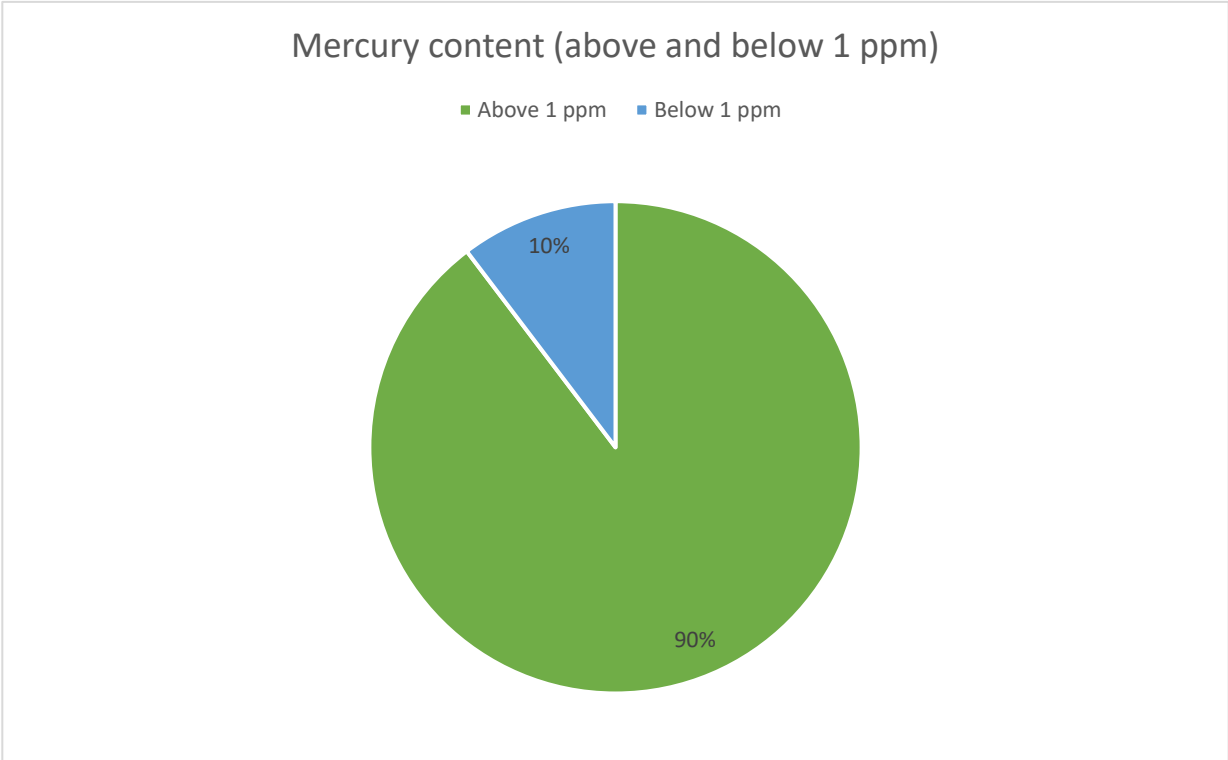
Papaya	Whitening & Freckle-Eliminating package	Kenya	jiji.co.ke
Parley	Beauty Cream	Jordan	jordan.desertcart.com
Parley	Beauty Cream	Jordan	amazon.ae
Parley	Beauty Cream	Nigeria	jiji.ng
Parley	Beauty Cream	Uganda	jiji.ug
Parley	Goldie Advanced Beauty Cream	Antigua and Barbuda	ebay.com
Parley	Goldie Advanced Beauty Cream	Jordan	jordan.desertcart.com
Parley	Goldie Advanced Beauty Cream	Jordan	amazon.ae
Parley	Goldie Advanced beauty cream	Kenya	jiji.co.ke
Parley	Goldie Advanced Beauty Cream	Nigeria	jiji.ng
Parley	Goldie Advanced Beauty Cream	Nigeria	jumia.com.ng
Parley	Goldie Advanced Beauty Cream	Philippines	lazada.com.ph
Parley	Goldie Advanced Beauty cream + Goldie and Hand body Cream	Belgium	ebay.be
Parley	Goldie Advanced Whitening Cream	Antigua and Barbuda	ebay.com
Parley	Goldie Hand and Body Cream	Antigua and Barbuda	ebay.com
Parley	Herbal Whitening Cream	Jordan	jordan.desertcart.com
Perlay	Goldie Hand and Body Cream	Philippines	shopee.ph
Pop Popular	Curcuma cream	Antigua and Barbuda	ebay.com
Pop Popular	Curcuma cream	Philippines	shopee.ph
Pop Popular	Curcuma cream	Thailand	lazada.co.th
Pop popular	Facial cream	Belgium	ebay.be
Pop Popular	Facial Cream	Jordan	jordan.desertcart.com
Pop Popular	Facial Cream	Thailand	shopee.co.th
RDL	Whitening Treatment Night Cream 8 Days Treatment	Indonesia	bukalapak.com
RDL	Whitening Treatment Night Cream 8 Days Treatment	Indonesia	shopee.co.id
Sakura	Gluta Speed White	Mexico	amazon.com
Sandal	Whitening Beauty Cream	Jordan	jordan.desertcart.com
Sandal	Whitening Beauty Cream	Jordan	amazon.ae
Sandal	Whitening Beauty Cream	Philippines	shopee.ph
Seven Herbal	Beauty Cream	Belgium	ebay.be

Skin Light	Beauty Cream	Uganda	jiji.ug
Skin Success	Beauty Cream	Uganda	jiji.ug
Skin Success	Beauty Cream	Uganda	jumia.ug
Stillman's	Skin Bleach Cream	Jordan	jordan.desertcart.com
Temulawak	Day & Night Cream	Indonesia	tokopedia.com
Temulawak	Day & Night Cream	Indonesia	shopee.co.id
White Gold	Anti-Marks Cream Extra Brightening	Antigua and Barbuda	ebay.com
White Gold	Anti-Marks Cream Extra Brightening	Kenya	jumia.com
White Rose	Whitening Cream - Placenta Sheep Cream	Antigua and Barbuda	ebay.com
White Rose	Whitening Cream - Placenta Sheep Cream	Belgium	ebay.be
White Rose	Whitening Cream - Super Gold Caviar	Antigua and Barbuda	ebay.com
White Rose	Whitening Cream - Super Gold Caviar	Jordan	jordan.desertcart.com
White Rose	Whitening Cream - Super Gold Caviar	Philippines	shopee.ph
White Rose	Whitening Cream - Super Gold Caviar	Thailand	lazada.co.th
Yinni - Green Tea	Quickacting Whitener and Speckle Remover	Philippines	shopee.ph
Zuni Gold	Beauty Cream	Uganda	jumia.ug
Zuni Gold	Finest Beauty Cream	India	flipkart.com
Zuni Gold	Finest beauty cream	Kenya	jiji.co.ke

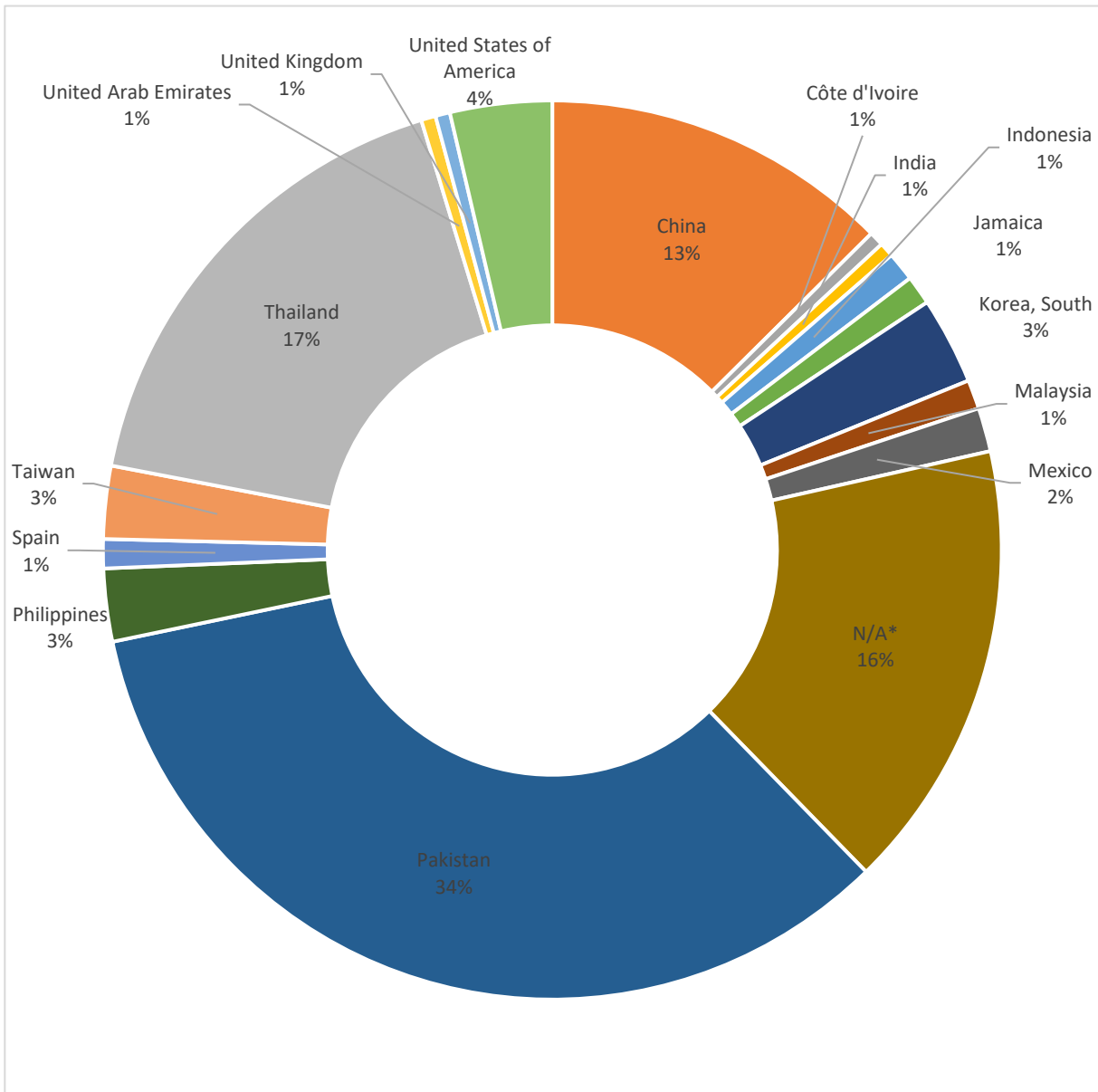
### 7.11 Annex K—Countries from where samples were purchased



**7.12 Annex L—Mercury content: percent of samples above or below 1ppm**



### 7.13 Annex M—Country of origin of SLPs over 1 ppm based on package labelling



\*Language issue or not indicated.

## 7.14 Annex N—False information and inconsistencies on packaging

**Table N.1:** Countries and online platform where Arché Formula AA Pearl Cream was purchased from and mercury concentrations (in ppm)

COUNTRY WHERE THE PRODUCT WAS PURCHASED	ONLINE PLATFORM FROM WHICH THE PRODUCT WAS PURCHASED	MERCURY CONCENTRATION (PPM)
Philippines	shopee.ph	137
Bangladesh	daraz.com.bd	127,7
Thailand	shopee.co.th	90,6
India	amazon.in	78,6
United States of America	ebay.com	4,5
Belgium	befr.ebay.be	1,46

**Table N.2:** Countries and online platform where WhiteGold Anti-Marks Extra Brightening was purchased from, manufacturer as per packaging and mercury concentrations (in ppm)

COUNTRY WHERE THE PRODUCT WAS PURCHASED FROM	ONLINE PLATFORM WHERE THE PRODUCT WAS PURCHASED FROM	MANUFACTURER AS PER PACKAGING	MERCURY CONCENTRATION (PPM)
United States of America	ebay.com	Whitegold France, Int.	23000
Kenya	jiji.co.ke	Whitegold France, Int.	18237,64
South Africa	bidorbuy.co.za	White Gold INTL	15414,22
United States of America	ebay.com	Whitegold France, Int.	27
Philippines	shopee.ph	G L Beauty Cosmetics Co., Ltd, PRC	15,8



## Annex O—Picture of Packaging of “White Gold Extra Brightening”

PHOTO OF THE PACKAGING (FRONT)	PHOTO OF THE PACKAGING (INGREDIENTS, NAME OF MANUFACTURER AND COUNTRY OF ORIGIN)
<b>Kenya</b>	
	
<b>Philippines</b>	
	
<b>United States of America (ebay.com, September 2023)</b>	
	

**WHITEGOLD FRANCE INT.®**  
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 ☎ Toll Free: 0800 12365  
 ✉ Email: advisorpk@wgfrance.com

**United States of America (ebay.com, June 2023)**



**PIMPLES:** Without proper treatment grow into severe problem. Before this problem get worse condition use WHITE GOLD ANTI-MARKS Cream twice a day. Not rub just apply on the effected area.

**FRECKLES:** This cream have contain specially formulated fruity extracts which have amazing results on light & dark freckles just in days.

**DARK CIRCLES:** This cream have superb action on dark circles even it does not matter how old & cause the circles.

**FAIR SKIN:** Its active ingredients & fruity brightening boosters are effective for all skin problems while its rich moisturizers protect your skin & give an even tone to your complexion.

A Complete Skin Solution in one Step.

**Ingredients:**  
 2- palmitoyloxymethyl-5-palmitoyloxy pyrone, Sodium L-Ascorbyl-2- phosphate, 1-hexadecanol, Octadecyl alcohol, Titanium (iv) oxid, Monostearin, Dibutyl hydroxytoluene (E321), Methyl p-hydroxybenzoate, Propyl p-hydroxybenzoate; (E216), Multi-hydrocarbon, Propane-1, PEG-150 Stearate, Steareth-20, Propanyl tetradecanoate, Cyclic Polydimethyl siloxane Polymers, Carbomer, Color grb (255,255,0), EDTA, Perfume & Special Method of Making.  
 ■ Please read informational leaflet carefully before use.

BATCH NO 3390  
 MFG: SEP 2022  
 EXP: SEP 2027

Suggested Retail Price  
 US\$ 6.00 , £ 5.00

**South Africa**



**PIMPLES:** Without proper treatment grow into severe problem. Before this problem get worse condition use WHITE GOLD ANTI-MARKS Cream twice a day. Not rub just apply on the effected area.

**FRECKLES:** This cream have contain specially formulated fruity extracts which have amazing results on light & dark freckles just in days.

**DARK CIRCLES:** This cream have superb action on dark circles even it does not matter how old & cause the circles.

**FAIR SKIN:** Its active ingredients & fruity brightening boosters are effective for all skin problems while its rich moisturizers protect your skin & give an even tone to your complexion.

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 ■ Please read informational leaflet carefully before use.

BATCH NO 08/03  
 MFG: AUG 2022  
 EXP: AUG 2026

Suggested Retail Price  
 US\$ 6.00 , £ 5.00

## 7.15 Annex P - Proposal by the Africa region to amend Part I and Part II of Annex A to the Minamata Convention on cosmetics at COP-5

### I. Proposal by the Africa region to amend Part I of Annex A to the Minamata Convention on Mercury

The Africa region proposes to insert the following text in Part I of Annex A (deleting the 1ppm mercury threshold for cosmetics):

Mercury-added products	Date after which the manufacture, import or export of the product shall not be allowed (phase-out date)
Cosmetics, including skin lightening soaps and creams, and not including eye area cosmetics where mercury is used as a preservative and no effective and safe substitute preservatives are available	2025

### II. Proposal by the Africa region to amend Part II of Annex A to the Minamata Convention on Mercury

The Africa region proposes to insert the following text in Part II of Annex A:

Mercury-added Products	Provisions
Cosmetics including skin lightening soaps and creams, and not including eye area cosmetics where mercury is used as a preservative and no effective and safe substitute preservatives are available.	<p>Measures to be taken by a Party to phase out the sale and offering of sale of mercury-added cosmetics from both local markets and online platforms shall include the following measures:</p> <ul style="list-style-type: none"> <li>i. Setting national objectives to phase out sales and offering of sales including, but not limited to carrying out two or more of the following: <ul style="list-style-type: none"> <li>a. Developing and implementing strategies to discourage marketing, advertising and display;</li> <li>b. Developing and publicizing advisories, detention and prohibited substances lists of mercury-added cosmetics;</li> <li>c. Licensing and product ingredient approvals for manufacturing facilities for cosmetics and beauty products;</li> <li>d. Engaging online platforms in developing and implementing product safety pledges.</li> </ul> </li> <li>ii. Coordinating and collaborating on phase out initiatives inter-ministerially and bilaterally and/or regionally;</li> <li>iii. Raising public awareness about the hazards of SLP use among physicians, dermatologists and beauty centers, as well as consumers and family members.</li> </ul>

See more information under the following page: <https://minamataconvention.org/en/news/proposal-botswana-and-burkina-faso-behalf-africa-region-amend-part-i-and-part-ii-annex>



**zero**   
mercury working group