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DISCUSSION DIGEST

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Mercury in Skin-Lightening Products: Risks, Challenges, Perceptions, and Solutions

The UCT Chemical Network (CN) held a discussion on the 13th of June 2024 titled 'Mercury in Skin-Lightening Products: Risks, Challenges, Perceptions, and Solutions'. This was presented by **Elena Lymeridi-Settimo** (Zero Mercury Working Group / European Environmental Bureau), **Ntseke Makutoane** (Department of Environmental Health, Lesotho), and **Michael Bender** (Zero Mercury Working Group / Mercury Policy Project). Click to view: [the PowerPoint presentation](#), [discussion recording](#), and [newsletter](#).

KEY MESSAGES

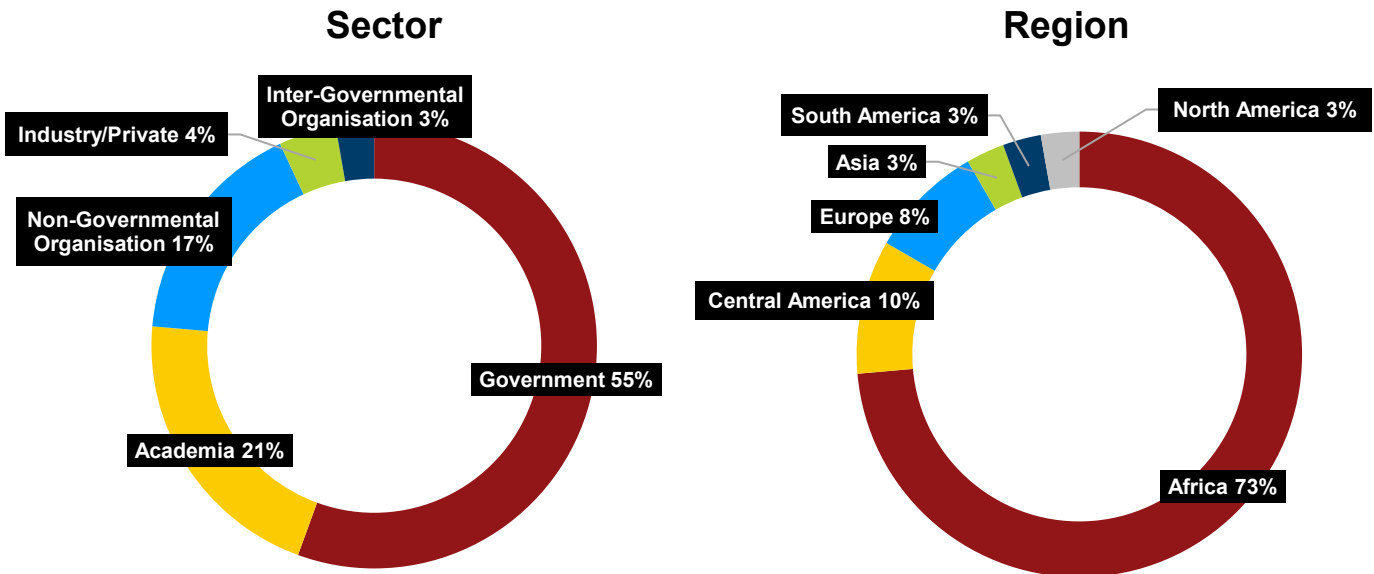
Skin-lightening products (SLPs) are **used all over the world**, a symbol of society grappling with **internalised racism and colourism**. Mercury is added to SLPs as it is inexpensive and rapidly causes lightening of skin. However, it is toxic and can be absorbed by the skin and the lungs. Mercury-containing SLPs therefore **pose significant health risks**, e.g. skin, eye, and kidney damage, and neurological toxicity; the World Health Organization (WHO) therefore recommends their phaseout. The Minamata Convention, adopted in 2013, **bans the manufacture and trade of cosmetics containing over 1 part per million (ppm) of mercury (Hg) by 2020 and all cosmetics containing mercury by 2025**. The Zero Mercury Working Group (ZMWG) **tested thousands of products** for mercury since 2017, including products sold in markets and on online platforms, and found a **very high number with very high mercury levels**.

Toxic online trade continues, with other regulatory challenges including **misleading packaging, advertising, untraceable products, and smuggling**. Key actions to combat these include **implementing a zero-tolerance for all mercury-containing cosmetics**, banning **advertising**, and banning **import, export, trade, and manufacture** of mercury-containing cosmetics. Strategies include **interagency collaboration, global and regional coordination**, and promoting a reduction in supply and demand. Countries and civil society organisations should consider where they have **regulatory gaps**, identify challenges associated with those gaps, determine where **capacity-building** is necessary, and apply effective **enforcement**. Mercury compounds are not currently regulated under the Minamata Convention although there is a provision/avenue available to do so.

A case study conducted in Lesotho interviewed 100 women, finding that 52% of these women use SLPs. SLPs are **easily accessible and affordable** to them, with the top 3 places of purchase being street vendors, supermarkets and pharmacies. The top reported motives were to **lighten their complexion, reduce blemishes, and to look more beautiful**, with a perception that lighter skin-tones make women more beautiful to men. Despite their awareness of health risks from SLP use, **the perceived social benefits of SLP use outweigh the perceived susceptibility to adverse outcomes**. This study highlighted the need for affordable skin care services to address SLP use at the basic level of education with targeted campaigns and the need to apply the Minamata Convention and enforce regulations.



ATTENDANCE BREAKDOWN



Total number of live participants = 72

Total number of participants who posted their responses prior = 3

ABOUT THE PRESENTERS



Elena Lymeridi-Settimo is the policy manager for the Zero Mercury Campaign (ZMC) at the European Environmental Bureau and the co-founder and international co-coordinator of the Zero Mercury Working Group (ZMWG), an international coalition of more than 110 non-government organisations (NGOs) from over 55 countries. Elena has over twenty years' experience working at European Union and global United Nations (UN) levels, assisting NGOs and governments to enact numerous mercury reduction policies, including adoption of mercury export and product bans, and supporting the development and implementation of the Minamata Convention. She co-leads the Zero Mercury Skin Lightening Cream Campaign and has co-authored several recent reports exposing

the illegal production, trade and sales of high mercury skin lighteners. She is also the co-lead of the products area of the UN Environmental Programme (UNEP) Global Mercury Partnership. Elena has a degree in chemistry (University of Athens, Greece), a Master of Science in business strategy and environmental management (University of Bradford, UK), and a Master of Business Administration (Solvay/Vrije Universiteit Brussel, Belgium).

Ntseke Makutoane is a senior health inspector in the Government of Lesotho, serving as a pollution control manager under the Department of Environmental Health. He has a Master of Public Health from the University of Cape Town, with an environmental health focus. Ntseke has over 10 years of experience in environmental health, management, and health campaign coordination. He is also a Young African Leaders Initiative alumni who obtained an international certificate of occupational hygiene (IcertOHTA) from the Occupational Health Training Association. He is passionate about environmental health, as a public health discipline, as well as occupational hygiene.





Michael Bender is co-lead of the UNEP Global Mercury Partnership product area, director of the Mercury Policy Project and international co-coordinator of the Zero Mercury Working Group, a coalition of over 110 NGOs from more than 55 countries working to reduce the global use, release, trade and exposure to mercury. He also helps lead the Zero Mercury Skin Lightening Campaign and since 2019 has co-authored several recent reports exposing the production, trade, sales and advertising of mercury-added skin lighteners. Michael has over thirty years experience working on programmes and policies to reduce mercury pollution and exposure.

CONTRIBUTIONS FROM PARTICIPANTS

Disclaimer: The information in this digest represents the opinions of members participating from different stakeholder groups expressed during the discussion. The views expressed in this document do not necessarily represent the opinion or the stated policy of the Swedish Chemicals Agency (KemI) or DEH UCT, nor does citing trade names or commercial processes constitute an endorsement

The key discussion points raised by participants are presented under each question. Throughout the discussion, informal polls were conducted to help encourage discussion among the participants. They do not provide any representative data but rather provide a snapshot of participants' views.

QUESTION 1

What are the concerns/issues with mercury-added skin-lightening products in your country or the organisation you work for? Include your country/organisation in your response.

Guyana

- There is not much control over skin-lightening products which might contain mercury, compounded by the contents of these products not being fully declared

South Africa

- Smuggling/illegal importation of mercury-based cosmetics
- Limited enforcement capacity
- Not many people are aware of the health risks involved in skin-lightening products, e.g. in small or rural communities
- Sharing these products in unlabelled containers
- E-commerce platforms sell cosmetic products with ingredient labels written in a foreign language
- These products are sold at a cheap price by street vendors

Uganda

- According to the standards, mercury is prohibited in cosmetics products
- If a poisonous chemical is found through testing, the product is subject to destruction and legal action taken against the perpetrator. However, there are many skin-lightening products that may have entered the country illegally

Iran

- There are concerns around the presence of mercury in skin-whitening products

Burkina Faso

- A lack of strict regulations and enforcement to control the presence of mercury

Senegal

- No control over imports
- Skin-lightening is a big problem in Senegal
- A lot of people mix products at home and sell them at the market, so it is unclear exactly what chemicals are being used
- Limited awareness around product contents and their dangers

Gabon

- There is a legal ban on the sale of lightening products on Gabonese territory, in cooperation with other countries such as Sri Lanka and Jamaica to eliminate these dangerous cosmetic products. However, these harmful products are still available at market stalls

Tanzania

- Many people got permanent skin damage in Tanzania before SLPs were banned



The Philippines

- Enforcement has always been the challenge
- Prohibited products are still available despite a ban
- Market monitoring continues to raise concern

Lesotho

- A lot of people, mainly in the rural areas of Lesotho, have cultural beliefs in the use of elemental mercury
- A lot of mercury-containing skin-lightening creams are widely available and are not monitored

Kenya

- Skin-lightening creams have been a challenge
- Online shopping stores are difficult to monitor as the products are not displayed in physical stores

Madagascar

- Lack of knowledge about mercury-containing products
- Health problems and environmental damage
- People may waste money on mercury-containing products

National Registers

- **Iran:** none
- **Liberia:** unknown
- **Senegal:** unknown
- **Uganda:** none
- **Zimbabwe:** none
- **Cameroon:** none
- **Namibia:** none
- **Zambia:** none
- **Malawi:** none
- **South Africa:** mercury poisoning is a notifiable condition
- **Kenya** has a database of skin-lightening creams maintained by the Kenya Bureau of Standards

Malawi

- Regulations for mercury poisoning are not specific, however, we have the Malawi Bureau of Standards which enforces standards on mercury-containing products

Cameroon

- Almost all beauty products contain mercury because the market is so satisfied with lightening products
- Action des Femmes pour une Planète Bio (AFEPB) had initiated an identification and awareness campaign, which was aborted due to a lack of funds

Environmental Management Agency, Zimbabwe

- The concern is over illegal imports from neighbouring countries. SLPs are illegally imported through passenger terminals as opposed to freight sections and proliferate in the informal sector

The Pollution Control Association of Liberia

- Awareness and persistent education of the public are needed. A robust coordination mechanism is also needed to tackle this problem

POLL QUESTIONS

Poll 1. Have you, or anyone you are aware of, experienced any adverse health effects from using skin-lightening products?

Yes	5
No	9
Don't Know	0

Poll 2. Does your country have a national register for mercury poisonings from skin-lightening products?

Yes	6
No	10
Don't Know	3

QUESTION 2

Why do people use skin-lightening products? Give specific examples of motivation factors.

- The pressure of white beauty standards, colourism, and racism drives the demand for skin-bleaching products
- Sociocultural and economic factors - societal pressures to conform to beauty standards and the belief that lighter skin tones can lead to better socioeconomic opportunities



- People believe lighter skin is associated with beauty and success, and are under the impression that they will be better accepted by society if they have lighter skin
- To have smooth and healthy-looking skin, to be beautiful, and obtain social favours in society such as marriage and good jobs
- Removal of dark patches
- People are influenced by Hollywood stars or influencers whom they admire and want to resemble
- It becomes fashionable to lighten skin or remove blemishes because people feel their skin must be perfect
- Some may be entrapped in using them as stopping them can result in the skin barrier breaking or a darker skin tone as these products may burn the user

POLL QUESTIONS

Poll 1. Where are people buying these products from?

Local markets	7
Street vendors	9
Online	5
Cosmetic shops	8
Pharmacy	5
Other (specify in the chat)	0

Poll 2. Are mercury-containing skin-lightening products allowed in your country?

Yes	4
No	6
Don't Know	0

Poll 3. Is there legislation restricting mercury-added skin-lightening products in your country/the country you work in? Include your country in your response

- Zambia: the legislations is yet to be put in place for manufacturing, importation or distribution
- Ethiopia: the cosmetics and sanitary directive issued by the Ethiopian Food and Drug Administration (FDA) allows thiomersal and phenyl mercuric salt up to 70ppm for eye make-up
- Several states in the US: California, Illinois, Minnesota, New York and New York City
- Iran: while there is evidence of global efforts to restrict mercury-added skin-lightening products, specific information about legislation in Iran is scarce
- Senegal: no legislation restricting mercury-added skin-lightening products. I think we have a project but nothing about legislation on this issue
- Gabon: the sale of lightening products is prohibited

QUESTION 3

How is your country planning/working on overcoming the challenges of banning mercury-added skin lightening products? Include the challenge and your country in your answer.

Guyana

- Regulators are working closely with customs and other standards bodies to ensure proper control measures are in place to monitor imports, and more work is planned to educate the public on the dangers of using these products
- The challenge is that many skin-lightening products might contain mercury, but are not listed on the label, so users assume they are safe

Zambia

- The Gold project has raised a lot of awareness
- Zambia is a signatory to Minamata, though the ban of products with mercury levels exceeding 1 ppm has not been put into effect

Lesotho

- Lesotho is a signatory to the Minamata Convention
- Primary mercury mines are prohibited



Burkina Faso

- The challenge in banning mercury-added skin-lightening products is related to the lack of specific regulation. To overcome this challenge, the country is taking proactive steps. Burkina Faso and Botswana proposed an amendment to Annex A, Parts I and II of the Minamata Convention on Mercury at the 2023 Conference of the Parties (COP), on behalf of the Africa region. This amendment aims to determine a date after which the production, import or export of cosmetic products containing mercury will no longer be authorised. According to the Ministry of Environment, a deadline of 2025 has been set for its entry into force and Burkina Faso also plans to develop strategies to discourage the advertising, display and marketing of cosmetic products containing mercury
- Through the Specific International Programme (SIP) project, awareness-raising has been conducted with the general public, including an interview on the dangers of mercury-containing cosmetics
- The current approach is to carry out a number of awareness-raising campaigns to discourage people from using these products and also to ban product advertising

Zimbabwe

- Zimbabwe is working through the Medicines Control Authority of Zimbabwe to screen all imports. Problematic entry points are known and manned either on a full-time or ad-hoc basis
- South Africa is a signatory to the Minamata Convention and, therefore, also bans the sale of products with a mercury (Hg) level of > 1ppm. There does seem to be a push to ban all skin-lightening lotions with any detectable levels of Hg. The challenge is enforcing this and ensuring that these products are not being illegally sold or imported

Gabon

- The challenge is authorities struggle to enforce the law banning the sale of these products. This would undoubtedly be because of porous borders, lack of trained personnel (customs officers), etc.

Madagascar

- Madagascar is a signatory to the Minamata Convention. The Ministry of Environment and Sustainable Development has already begun campaigns to educate the public about the Minamata Convention and the dangers of mercury, but enforcement of the convention can be challenging
- Link to our database where you can see the products with high mercury - <https://www.zeromercury.org/projects/mercury-added-skin-lightening-creams-campaign-database/>

South Africa

- Challenges include lack of enforcement of regulations
- The recent draft of National Regulations for the Management of Mercury in South Africa published for public comment prohibits the import of cosmetics with mercury content above 1 part per million (ppm) and the phase-out date is 2025 April 01, supporting the Minamata Convention on Mercury
- There is a regulation that bans mercury in cosmetics, which was proposed for review but never finalised. The country should look at finalising the regulations and consider proposed control measures as per these presentations
- The challenge is the limited capacity to finalise these regulations

Senegal

- Senegal ratified the Minamata Convention and has Mercury Initial Assessments and an action. These approaches could help domestication of the convention and the process of regulation

Tanzania

- There is strict legislation to control mercury in skin-lightening products

Iran

- Several steps have been taken including implementing regulations prohibiting the production, import, and sale of these products, conducting awareness-raising campaigns to educate the public about the dangers of mercury exposure, and working with retailers to ensure compliance



POLL QUESTIONS

Poll 1. List opportunities/national measures the Minamata Convention needs to support nationally to ensure reduction & elimination of mercury-added cosmetics

- Customs training, lab testing support, and awareness campaigns
- Enforcement of bans
- Public awareness
- Reclamation of contaminated environments
- Ethiopia: technical training, awareness for policymakers, legal frameworks
- Many countries ratified the Minamata Convention. The domestication of the convention may help to regulate mercury in skin-lightening products
- State or country bans to provide inspection and enforcement authority
- Registries of known products for public awareness and mandated product withdrawal by all sellers
- Good awareness-raising materials for all stakeholders in the skin-lightening cream value chain would be very useful
- Lesotho: international mercury ban
- South Africa: Support required is cosmetics legislation development, field samplings, screening tools and user manuals, and guidelines/manuals on control measures

Poll 2. Is there support in your country for a national sales and advertising ban of these products?

Yes	3
No	7
Don't Know	3

RESOURCES

1. Zero Mercury Working Group (ZMWG). Mercury-Added Skin-Lightening Creams Campaign. <https://www.zeromercury.org/mercury-added-skin-lightening-creams-campaign/>
2. ZMWG. Online Marketing of Toxic Skin Lighteners. October 2023. <https://www.zeromercury.org/wp-content/uploads/2023/10/ZMWG-SLP-Oct-2023-Full-Report.pdf>
3. Environmental Investigation Agency. Report: Mercury in Retrograde. October 2023. <https://us.eia.org/report/mercury-in-retrograde/>
4. World Health Organization. Mercury in skin lightening products. 3 Nov 2019. <https://www.who.int/publications/i/item/WHO-CED-PHE-EPE-19.13>
5. ZMWG. Draft Report: Overcoming the Challenges of Banning Manufacture and Trade of Mercury Added Skin Lightening Products under the Minamata Convention. 10 June 2024 <https://drive.google.com/file/d/1zIRaAc808YkbL5tnBWYk9vXqfQU9w8MI/view?usp=sharing>
6. ZMWG. Report: Enforcement measures to restrict high mercury cosmetic products under the Minamata Convention. Nov 2019. <https://www.zeromercury.org/wp-content/uploads/2019/11/Enforcement-measures-to-restrict-high-mercury-cosmetic-products-under-the-Minamata-Convention.pdf>
7. National Resources Defense Council. Feasibility of conducting a global inventory of mercury compound supply, use and trade. March 2023. <https://www.nrdc.org/sites/default/files/2023-10/mercury-compounds-inventory-feasibility-study-202303.pdf>
8. Minamata Convention on Mercury Conference of the Parties 5 (COP5). Decision on mercury compounds. Nov 2023. <https://minamataconvention.org/en/documents/study-global-supply-production-trade-and-use-mercury-compounds>
9. Minamata COP5 Decision on cosmetics. Nov 2023. <https://minamataconvention.org/en/documents/preparation-report-cosmetics-listed-part-i-annex-minamata-convention-mercury>
10. Minamata Convention Invitation to submit information by 30 June 2024. March 2024. <https://minamataconvention.org/en/news/invitation-submit-information-regarding-mercury-added-cosmetics-pursuant-cop-decision-mc-55>



11. ZMWG Posters on the impact of mercury-containing skin-lightening products on health <https://www.zeromercury.org/wp-content/uploads/2023/03/4.Dermatologists-Poster-English-PRINT.pdf> (English), <https://www.zeromercury.org/wp-content/uploads/2023/03/4.Dermatologists-Poster-Francaise-PRINT.pdf> (French)
12. ZMWG Posters on the impact of mercury-containing skin-lightening products on pregnant women: <https://www.zeromercury.org/wp-content/uploads/2023/03/3.Dermatologists-Poster-pregnant-woman-English.pdf> (English), <https://www.zeromercury.org/wp-content/uploads/2023/03/3.Dermatologists-Poster-pregnant-woman-francaise.pdf> (French)
13. Global Mercury Partnership knowledge hub on eliminating skin-lightening. <https://www.unep.org/mercuryfreecosmetics>
14. UNEP: Tackling Mercury Pollution and Racial Discrimination Jointly. <https://www.unep.org/globalmercurypartnership/news/editorial/tackling-mercury-pollution-and-racial-discrimination-jointly>

Chemical Network: The Chemical Network is a non-partisan online forum established by the Division of Environmental Health (DEH) at the University of Cape Town's (UCT) School of Public Health. It was established as part of a knowledge management and sharing project supported by the Swedish Chemicals Authority (KemI).

This forum has been produced with financial assistance from Sweden, through the Swedish International Development Cooperation Agency (SIDA), which has been arranged by the Swedish Chemicals Agency (KemI). The views herein shall not be taken to reflect the official opinion of SIDA or the Swedish Chemicals Agency.

If you have any questions or require clarification on this initiative, please contact UCT at chemicallistserver@gmail.com. If you are not already a member, join the Chemical Network at: <http://eepurl.com/hf9nwf>

