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Guidance on Monitoring and Enforcement Measures to Eliminate Mercury-added Skin Lightening Products

Developed under the GEF 10810 Project:
Eliminating Mercury Skin Lightening Products (Jamaica, Gabon and Sri Lanka)

2026

Guidance on Monitoring and Enforcement Measures to Eliminate Mercury-added Skin Lightening Products

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Biodiversity Research Institute (BRI) is a 501(c)3 nonprofit organization located in Portland, Maine, USA. Founded in 1998, BRI is dedicated toward supporting global health through collaborative ecological research, assessment of ecosystem health, improving environmental awareness, and informing science-based decision making.

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DISCLAIMER: The sole responsibility for the content of the overall report lies with the co-authors. The views reflected are solely those of the co-authors and are not necessarily those of the other institutions or stakeholders that supported the report.

Contents

Acronyms and Abbreviations

Automated System for Customs Data	ASYCUDA
Biodiversity Research Institute	BRI
Consumer Affairs Authority	CAA
Environmental Investigation Agency	EIA
Global Environment Facility	GEF
Global Environment Facility Project 10810 Eliminating Mercury Skin Lightening Products (Jamaica, Gabon and Sri Lanka)	GEF Project 10810
Global Mercury Partnership	GMP
Harmonized Commodity Description and Coding System	HS
L'Agence Nationale du Médicament et des Autres Produits de Santé (Gabon)	ANMAPS (Gabon)
Multilateral Environmental Agreement	MEA
National Medicines Regulatory Authority (Sri Lanka)	NMRA
Parts per million	ppm
Sixth meeting of the Conference of the Parties to the Minamata Convention on Mercury	COP6
Skin Lightening Products	SLPs
Standard Operating Procedures	SOPs
United Nations Environment Programme	UNEP
World Customs Organization	WCO
World Health Organization	WHO
World Trade Organization	WTO
x-ray fluorescence	XRF
Zero Mercury Working Group	ZMWG

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This guidance document has been developed under the Global Environment Facility (GEF) Project 10810 *Eliminating Mercury Skin Lightening Products (Jamaica, Gabon and Sri Lanka)*. It summarizes findings and insights generated through background research, stakeholder consultations, and a series of training workshops conducted as part of the project, with particular reference to the Sri Lanka National Workshop held in Colombo, Sri Lanka on 2 June 2025. Relevant workshop materials and reports have informed the development of this document.

The authors gratefully acknowledge the valuable contributions of Ms. Anna Kobylecka (World Customs Organization), Mr. Eisaku Toda (Secretariat of Minamata Convention on Mercury), Ms. Elena Lymberidi-Settimo (European Environmental Bureau Zero Mercury Working Group), Dr. Elena Jardan (World Health Organization), Mr. Kyaw Nyunt Maung (United Nations Environment Programme), the team at the Asian Institute of Technology's Regional Resource Center for Asia and the Pacific, and the other presenters, facilitators, and participants whose expertise and practical experience have been referenced throughout this guidance document. Their contributions informed key sections among others relating to:

- Tools and resources for Customs and other agencies for the effective management of mercury trade and mercury mass flow;
- Understanding the role of customs authorities and the resources available to enhance implementation of the Minamata Convention on Mercury and related environmental agreements;
- Strengthening national institutional capacity and understanding the interlinkages among customs, environmental agencies, and law enforcement bodies;
- Training in mercury detection and forensic analysis techniques; and
- Development of national action plans and standard operating procedures (SOPs) for enforcement agencies.

The authors also extend their appreciation to all national stakeholders, partner institutions, and technical experts who contributed their time, knowledge, and perspectives to support the activities that informed preparation of this guidance document.

1.0 Purpose of Document

The market for skin lightening products (SLPs), also referred to as whitening or bleaching products, is widespread across various regions, often driven by deeply ingrained cultural and

social ideals of beauty. Despite their toxicity, mercury compounds (among other potentially harmful substances) have been historically used in SLPs due to their ability to inhibit the production of melanin, the natural pigment that is responsible for color of skin.

As part of the global treaty to protect human health and the environment from the harmful effects of mercury emissions and releases, the Minamata Convention on Mercury[1], Parties *(countries that have joined the Minamata Convention)* are obligated to phase out the manufacture, import and export of mercury-added SLPs, among other key obligations.

Each government that has become a Party to the Minamata Convention on Mercury may have their own regulatory approach to incorporating the Minamata Convention's provisions. To support its practical application, this guidance document has been developed to provide support to Customs and enforcement officers (among other key stakeholders) in strengthening the detection, control, seizure, and reporting of mercury-added SLPs *(and by extension, mercury, mercury compounds and other mercury-added products).*

This guide document summarizes findings of related background research, stakeholder consultations and training workshops[2] conducted under the GEF 10810 Project, *Eliminating Mercury Skin Lightening Products (Jamaica, Gabon and Sri Lanka)* to provide support to Customs authorities and enforcement officers (among other key stakeholders) in strengthening the detection, control, seizure, and reporting of mercury-added SLPs *(and by extension, mercury, mercury compounds and other mercury-added products)*.

Customs authorities and enforcement officers contribute to protecting public health, preventing the circulation of hazardous and illegal products, supporting environmental protection, and fulfilling international obligations. Stopping the trade of mercury-added SLPs prevents harmful exposure before products reach consumers.

The contents of this document focus mainly on best practices and lessons learned for conducting surveillance activities to monitor the manufacture, import and export of mercury-added SLPs. General guidelines and recommendations were made so that they can be applied in a broader context and adapted based on national regulatory capacities in place.

[1] https://minamataconvention.org/en
[2] Available at: Eliminating Mercury-added Skin Lightening Products - Biodiversity Research Institute - Innovative Wildlife Science Worldwide | Portland, ME USA

For further details on regulatory guidelines, assessments on supply chains and online sales of mercury-added SLPs found on global markets, resources will be provided via the United Nations Environment Programme's Global Mercury Partnership (UNEP GMP) webpage at the following link: https://www.unep.org/globalmercurypartnership/our-work/mercury-products/eliminating-mercury-skin-lightening-products.

Key supporting materials to be made available at the above link are illustrated in the diagram below.

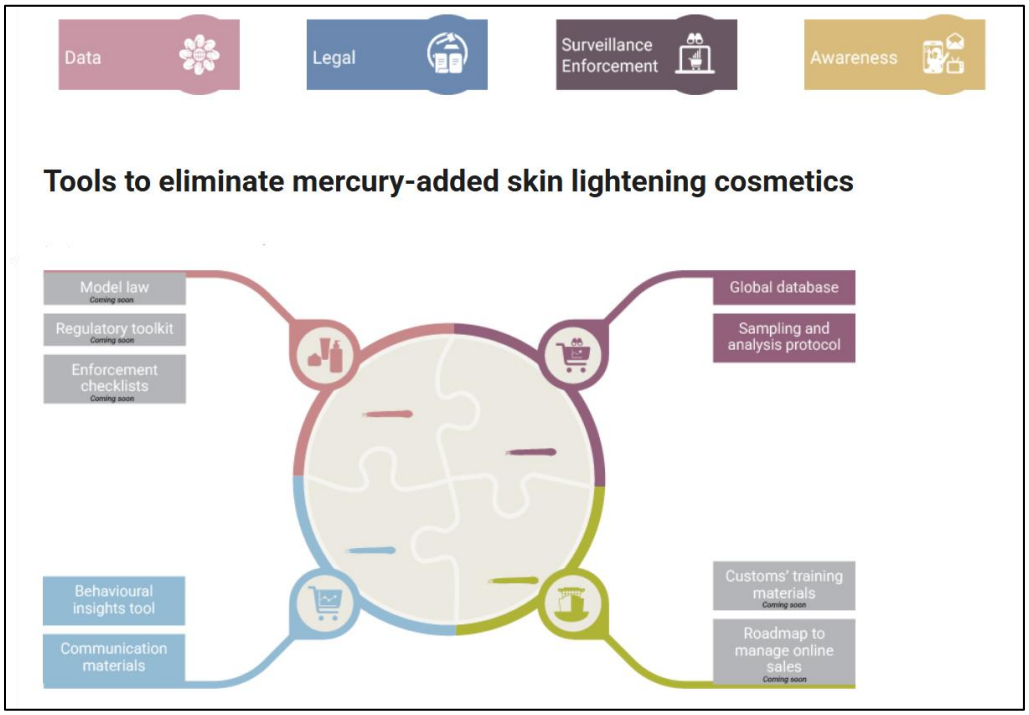


Figure 1: Diagram of Key Tools developed under the GEF 10810 Project (UNEP GMP, 2026)

2.0 Obligations Under the Minamata Convention on Mercury Related to Mercury-Added Skin Lightening Products

2.1 Regulatory Framework and Supply Chain Controls for Mercury-added Products under the Minamata Convention on Mercury

The Minamata Convention on Mercury is a multilateral environmental agreement (MEA) that seeks to protect human health and the environment from the anthropogenic emissions and releases of mercury and its compounds through strategic guidance and voluntary obligations from countries that become a Party[3]. The Convention establishes specific obligations (articles) for Parties regarding activities involving mercury, including the manufacture, import, export and disposal of mercury-added products[3].

Article 4 (Mercury-added products) addresses the control and phase-out of mercury-added products in order to reduce global demand for mercury and prevent harmful exposure to humans and the environment. Under Article 4, Parties are required to prohibit the manufacture, import, and export of specified mercury-added products listed in Part I of Annex A after the agreed phase-out dates, unless a registered exemption applies. These products include certain batteries, switches and relays, fluorescent lamps, and cosmetics (e.g., SLPs) containing mercury. Regarding mercury-added SLPs, at the sixth meeting of the Conference of the Parties (COP6) to the Minamata Convention on Mercury, a decision was made to amend Annex A[4] to state that as of 2025, manufacture, import and export shall not be allowed for "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*". Further specification was included to note that this phase-out did not apply to cosmetics, soaps or creams with "trace contaminants of mercury". There is currently no definitive concentration for "trace contaminants of mercury" as it is left up to the discretion of Parties to determine what feasible thresholds can be implemented. Previously, the Convention text listed 1 part per million (ppm) as the threshold for mercury in cosmetics. Further work is ongoing by technical experts to provide guidance on threshold refinements.

Under the Convention, "mercury" includes elemental mercury, mercury mixtures with other substances, and mercury compounds. Inorganic mercury compounds are commonly used in SLPs as active ingredients because they inhibit the production of melanin in the skin. To address

[3] https://minamataconvention.org/en/resources/minamata-convention-mercury-text-and-annexes
[4] UNEP-MC-COP6-Dec3-Amendments-AnnexA_English.pdf

this, **Article 3 (Mercury supply sources and trade)** of the Convention establishes the core international controls on mercury supply and trade. The primary objective is to restrict the availability of mercury by regulating its production, movement, and transfer across borders, thereby reducing the risk of illegal trade and environmental harm. Article 3 further stipulates that mercury may only be traded for environmentally sound and permitted uses, and that exporting Parties must obtain prior written consent from importing Parties before trade occurs. Collectively, these measures are intended to restrict the global circulation of mercury, thereby restricting its use for the production of mercury-added products (like SLPs) and other products/processes.

Article 3 of the Convention applies to:

- Mercury or mercury mixtures with at least 95% mercury concentration by weight; and
- The following mercury compounds: mercury (I) chloride (calomel), mercury (II) oxide, mercury (II) sulphate, mercury(II) nitrate, cinnabar, and mercury sulphide.

The international movement of mercury and certain mercury compounds under Article 3 requires specific documentation, written consent, certification, and authorization procedures. In addition, the import and export of certain mercury-added products must be controlled by Parties as part of meeting their Convention obligations. The specific documentation and consent requirements can be found in the following official guidance and Convention documents:

- Forms and Guidance Documents – Article 3 Mercury Trade Forms
- Guidance on Completing the Forms Required Under Article 3 Related to Trade in Mercury
- Required Content of the Certification Required for the Import of Mercury from Non-parties in Accordance with Paragraphs 6 (b) and 8 of Article 3

Controlling mercury at the level of supply chains alone is not sufficient to prevent its diversion into prohibited uses such as SLPs. While Articles 3 and 4 of the Minamata Convention address the upstream trade and restriction of mercury-added products, further provisions of the Convention strengthen its life-cycle approach to mercury management. **Article 10 (Environmentally sound interim storage of mercury, other than waste mercury)** and **Article 11 (Mercury wastes)** play an important complementary role. Article 10 of the Convention requires that Parties must ensure that mercury, mercury compounds and excess by-products of production processes are managed in an environmentally sound manner and not reintroduced into illegal or informal markets for prohibited uses. Article 11 aligns with obligations under the related Basel Convention multilateral environmental agreement for the management of mercury wastes. Waste that consists

of/contains/contaminated with mercury or mercury compounds must be handled, collected, transported, and disposed of in an environmentally sound manner. The Article further requires that mercury waste not be transported across international boundaries except for the purpose of environmentally sound disposal. Effective waste control under Article 11 is essential to closing potential loopholes in the mercury life cycle.

The COP6 information document, *Study of the Global Supply, Production, Trade and Use of Mercury Compounds*[5], provides further insight on mercury from production systems and broader trade flows, with implications for existing control measures. It illustrates that while Parties are required to phase-out mercury-added cosmetics, including SLPs, evidence from recent studies and enforcement investigations indicates that the production and trade of mercury-added SLPs continues in many regions, particularly cross-border trade and e-commerce channels.

The persistence of mercury-containing SLPs is facilitated by several factors, including limited consumer awareness, inconsistent national regulation of mercury compounds, online sales platforms, and continuing international trade in mercury compounds used as cosmetic additives.

2.2 Other Relevant Multilateral Environmental Agreements (MEAs)

Other MEAs have relevance to the trade, seizure, and disposal of mercury-added SLPs, including the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade[6].

The provisions detailed in the Basel Convention apply to mercury wastes *(which may include mercury-added SLPs that were seized, expired, returned or discarded)* that must be transported for environmentally sound disposal. Any transboundary movement such as seized or waste products must comply with Basel Convention requirements, including notification, consent, and environmentally sound management.

The Rotterdam Convention supports Customs officers and other key stakeholders in identifying mercury compounds that are subject to control in international trade. Knowledge of controlled mercury chemicals assists officers in recognizing high-risk shipments and undeclared goods.

[5] UNEP-MC-COP6-INF05-Compounds_Trade_Study_English.pdf
[6] https://www.brsmeas.org/Resources/Shared/scripts/appPubKit/docs/04b-BaselConvention-ManualForCustomsOfficers.English.pdf

2.3 Engagement of Customs and Enforcement Stakeholders in Implementing Mercury-Added Skin Lightening Product Phase-out Measures

For countries that are Party to the Minamata Convention on Mercury or other related agreements outlined in Section 2.2, national policies and regulations should be in place to enable their enforcement. Once in place, Customs and enforcement authorities play a critical role in implementing trade-related MEAs, including those governing mercury-added SLPs. Their responsibilities include, but are not limited to:

- Facilitating legitimate trade;
- Detecting and preventing illegal trade and distribution;
- Verifying the accuracy and validity of trade/product documentation;
- Ensuring that imports, exports and marketed goods comply with applicable prohibitions and restrictions, combating fraud; and
- Notifying traders, distributors and the public of prohibited and allowed goods and products.

Through these functions, Customs and enforcement officers serve as frontline safeguards against environmental harm and are essential to the effective enforcement of international obligations aimed at protecting both national and global environmental integrity. However, effective implementation also depends on a broader network of national institutions, including agencies responsible for environmental protection, chemical management, and monitoring of hazardous substances. This includes standards and labelling of goods authorities, consumer protection and consumer affairs bodies, and other agencies responsible for regulating products placed on the market. Law enforcement bodies also play a critical role in investigating illicit trade, supporting compliance, and addressing environmental misconduct. In many contexts, these institutions often work alongside customs, environmental, and health agencies in coordinated enforcement systems.

Monitoring and enforcing these control measures remain challenging, and Customs and enforcement authorities require strengthened capacity to effectively identify mercury, mercury-added products, and mercury wastes.

For enhancing mercury-added SLP management, the provision of guidance materials and/or trainings for Customs and enforcement authorities in Jamaica, Gabon and Sri Lanka were facilitated under the GEF 10810 Project, *Eliminating Mercury Skin Lightening Products (Jamaica, Gabon and Sri Lanka)* project between 2025 -2026. Further workshops in the Asian region were

also supported through collaboration with a related project, *Project for promoting the Minamata Convention on Mercury by making the most of Japan's knowledge and experiences* funded by the Government of Japan and implemented by UNEP. Both projects supported frontline enforcement agencies in applying international obligations in practice and improving inter-agency coordination. Summaries of the workshops and materials provided under both initiatives are included in Annex 1 of this document.

3.0 Background on the Manufacture and Trade of Mercury-Added Skin Lightening Products (SLPs)

3.1 The Use of Mercury in Skin Lightening Products (SLPs)

Skin-lightening practices have a long history across many ethnicities, often rooted in social, cultural and economic factors. This practice involves using various product types (e.g., creams, soaps, serums) or treatments to lighten skin and have significantly evolved over time. The global industry for SLPs is among the fastest growing segments of the beauty industry, projected to reach a value of over 16 billion (USD) by 2030 (UNEP, 2025).[7]

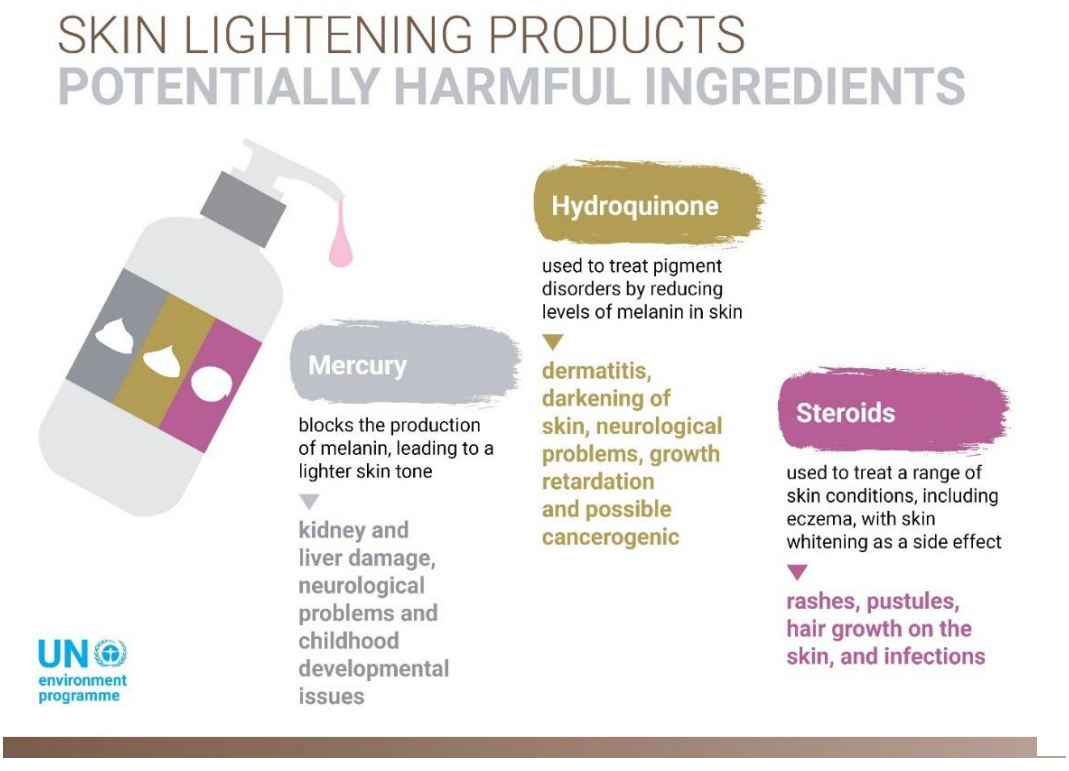


Figure 2: Potential ingredient risks of skin-lightening products © UNEP

[7] Report on Cosmetics Listed in Part I of Annex A to the Minamata Convention on Mercury. UNEP/MC/COP.6/INF/8

SLPs often use harmful active ingredients including steroids, hydroquinone, mercury, among others, without medical supervision. Although there are some legitimate uses of SLPs to treat dermatological disorders (e.g., hyperpigmentation), medically prescribed SLPs do not use mercury as an active ingredient due to its negative health impacts[8].

3.1.1. Manufacture and Trade of Mercury-Added Skin Lightening Products (SLPs)

Mercury has been identified as one of the top ten chemicals of major health concern by the World Health Organization (WHO)[9]. Despite this, mercury compounds continue to be found as an ingredient in approximately ten percent of SLPs assessed on global markets[10]. Mercury in cosmetics can exist in two forms: inorganic and organic[11]. Organic mercury compounds such as phenyl mercuric salts may be used as a preservative.

The mercury compounds commonly associated with SLP manufacture include[12]:

- mercury (II) amidochloride (ammoniated mercury),
- mercury (II) chloride,
- mercury (II) oxide,
- calomel (mercury(I) chloride), and
- mercury (II) iodide.

Among these compounds, ammoniated mercury has been identified as one of the most frequently used additives in SLP formulations due to its skin-lightening properties linked to inhibition of melanin production through interference with the tyrosinase enzyme. Mercury (II) iodide has also been identified in some products and is considered particularly relevant because of its availability, solubility in cream formulations, and effectiveness.

Available trade and market information demonstrates that a wide range of chemical suppliers and vendors continue to offer mercury compounds commercially, including compounds associated with SLP manufacture. Furthermore, mercury compounds can be produced at a relatively low cost, potentially facilitating their manufacture and trade for downstream uses, including

[8] Hamann, C.R., Boonchai, W., Wen, L., Sakanashi, E.N., Chu, C.Y., Hamann, K., Hamann, C.P., Sinniah, K. and Hamann, D., 2014. Spectrometric analysis of mercury content in 549 skin-lightening products: is mercury toxicity a hidden global health hazard?. Journal of the American Academy of Dermatology, 70(2), pp.281-287.
[9] https://www.who.int/news-room/fact-sheets/detail/mercury-and-health
[10] https://storymaps.arcgis.com/stories/64b0664f98d347c3ab226b51267bd805
[11] Ladizinski B, Mistry N, Kundu RV (2011). Widespread use of toxic skin-lightening compounds: medical and psychological aspects. Dermatologic Clinics, 29:111-123.

incorporation into cosmetics and SLPs. Compounds identified as comparatively inexpensive and commercially accessible include mercury (II) amidochloride, mercury (II) chloride, mercury (II) iodide, mercury (II) oxide, mercury (II) sulfate, mercury (II) nitrate, and mercury(I) chloride[12].

Studies cited by the Zero Mercury Working Group (ZMWG), the Environmental Investigation Agency (EIA), and other organizations indicate that mercury-added SLPs continue to be produced and marketed in the African, Asian, Caribbean and Latin American regions, as well as within diaspora communities globally.

Assessments of available data on mercury-added SLPs indicate that the top country of origin (according to product package labeling) for mercury-added SLPs is Pakistan with over 30% of mercury-added SLPs in comparison to other countries of origin listed (ZMWG, 2025)[13]. When compiled with other data sources under a BRI assessment conducted, more recent data post-2020 indicate that top manufacturing countries (according to package labeling) are Pakistan *(leading source)*, Malaysia, Mexico, Thailand, China and France for mercury-added SLPs with concentrations greater than 1 ppm.

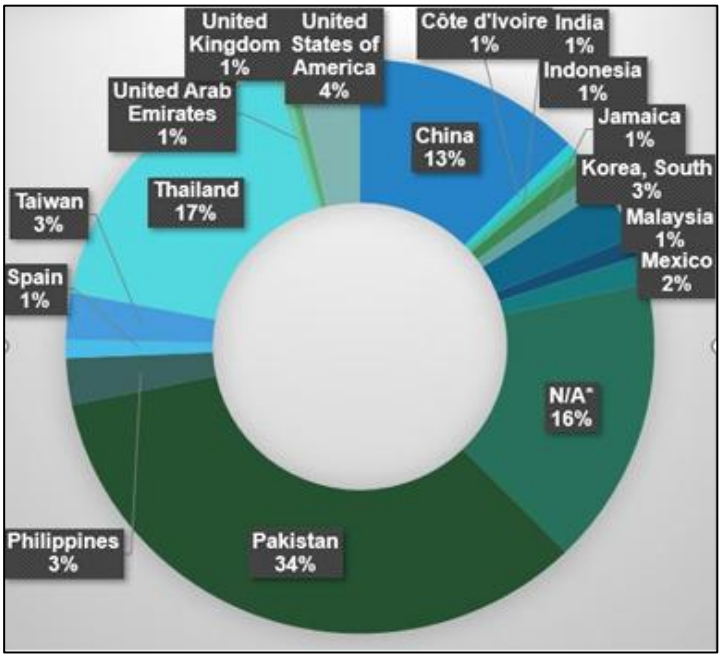


Figure 2: ZMWG Database showing Countries of Origin (based on package labeling) of Mercury-added SLPs with mercury concentrations exceeding 1ppm[14].

[12] Secretariat of the Minamata Convention on Mercury (2025) Study of the Global Supply, Production, Trade and Use of Mercury Compounds. UNEP/MC/COP.6/INF/5. https://minamataconvention.org/en/documents/unep-mc-cop-6-inf-5-study-global-supply-production-trade-and-use-mercury-compounds

[13] https://www.zeromercury.org/wp-content/uploads/2025/10/ZMWG-Zero-Out-Toxic-Production-Oct-2025-Full-Report.pdf

In terms of distribution, mercury-added SLPs are found across the globe regardless of proximity to manufacturing trade routes. A 2023 investigation conducted by the EIA indicated that for products manufactured in Thailand, Pakistan and Jamaica, mercury compounds were imported by manufacturers from India, Spain and the United States. This indicates that the trade of mercury compounds persists despite international and national regulatory restrictions[14].

3.1.2 Levels of Mercury Observed in Skin Lightening Products (SLPs) Assessed

As stated previously, previous assessments indicate that approximately 10% of SLPs on the global market contain mercury. For that 10%, a summary of mercury concentrations observed in the BRI analysis of mercury-added SLPs were as follows:

- 57.8% of mercury-added SLPs indicated concentrations of mercury that exceeded 50 ppm. Concentrations ranged from 59 ppm to as high as 838,123 ppm. Studies indicated that mercury concentrations consistently exceed 1,000 ppm for most samples analyzed in this category.
- 9.5% of mercury-added SLPs from global data assessments indicated mercury concentrations between 1 – 50 ppm.
- 32.7% of mercury-added SLPs indicated concentrations below 1ppm *(~ 0.001 – 1 ppm).* This may be due to unintentional contamination during the manufacturing or sampling process. The accuracy of analyses conducted for these low levels is also subjective to the level of accuracy of the types of analytical equipment used (discussed further in later sections).

Mercury-added products are often difficult to identify because mercury may be concealed, undeclared, or chemically disguised within products or supply chains. In many cases, manufacturers do not clearly disclose mercury content on product labels or use alternative names that are not easily recognized by consumers or enforcement authorities. Some products are intentionally marketed as “natural”, or “herbal” despite containing mercury compounds, while others may lack the ingredient list entirely. Mercury compounds may also be listed under other names that are difficult to identify, such as “calomel” which is a mercury(I) chloride salt. Over 90% of mercury-added SLPs identified in BRI assessments conducted did not have any indication

[14] EIA (2023) Mercury in Retrograde. The Dark World of Toxic Skin Lightening Products. https://eia.org/report/mercury-in-retrograde/

according to their product packaging that mercury or mercury compounds were added as ingredients.

Under the GEF 10810 Project, the available descriptions and product information on mercury-added SLPs were assessed. Through this project, a global database using ArcGIS StoryMap was developed by BRI in collaboration with the UNEP GMP, to compile publicly accessible databases and assessments on SLPs (from 1997-2025) from verified sources as well as findings under the project to better understand global and regional trends in the manufacture and distribution of mercury-added SLPs as well as better understand identifying factors to monitor these products.

4.0 Recommended Approaches/Techniques for Rapidly Identifying Mercury-Added Skin Lightening Products (SLPs)

To eliminate mercury-added SLPs on the market, it is recommended that monitoring and enforcement authorities, including Customs, standards and regulations authorities, consumer affairs entities etc., conduct regular market surveillance exercises, importation audits and enforce regulatory requirements to better track and monitor imports and trade of cosmetics. This may include regular inspections of stores, markets, and online platforms to identify potential violations; risk profiling on suspected products; and enforcement of regulatory standards followed by regular audits on goods identified for import or export to ensure compliance.

To conduct these assessments for monitoring and enforcement, several approaches may be employed. Three general approaches that may be utilized independently or jointly are presented below.

4.1 Desktop Screening Tools: Global and National Product Lists/Databases

Assessments on the presence and concentrations of mercury in mercury-added SLPs have been conducted by researchers, global and national monitoring entities and other stakeholders over the years. Under the GEF 10810 project, 80 verified sources of mercury-added SLP data were reviewed and made available via a global analysis database available at the below web link[15]:

https://storymaps.arcgis.com/stories/64b0664f98d347c3ab226b51267bd805

[15] Direct references used are available in the “References” link provided on the project database at: https://briwildlife.org/wp-content/uploads/2026/04/BRI-SLP-Database-References.pdf

Global databases on known mercury-added SLPs can be used to create national detention lists or be used as references for monitoring and enforcement entities. Comprehensive databases and publicly accessible regulatory resources play a critical role in efforts to eliminate mercury-added SLPs from national and international markets. By consolidating validated information on non-compliant products, brands, packaging characteristics, and trade patterns, these tools provide customs and enforcement authorities with actionable intelligence that enables more targeted and effective interventions. Authorities can use database-driven risk profiling to focus on high-risk shipments and repeat offenders, significantly improving detection rates at borders and points of sale. Searchable databases further strengthen enforcement by allowing customs officials to cross-reference import documentation and physical inspections against known hazardous products.

Together, global databases and national detention or alert lists form an essential framework for protecting public health and advancing consumer safety. As awareness of the health risks associated with mercury-added SLPs continues to grow, strengthening the accessibility, interoperability, and regular updating of these resources will be key to achieving sustained reductions in mercury exposure worldwide.

National Alerts – Gabon:

On 25 July 2025, an independent administrative authority under the supervision of the Ministry of Health in Gabon, L'Agence Nationale du Médicament et des Autres Produits de Santé (ANMAPS), published a non-exhaustive list of 57 mercury-added SLPs that should be prohibited from being imported and sold in Gabon[16].

This list which will be periodically updated can be used by Customs, monitoring and enforcement authorities and the general public to enhance the phase-out of the import, distribution and sale of these products. A global database published by the Zero Mercury Working Group (ZMWG)[17] was used as a reference for the development of ANMAPS public notice.


ANMAPS

DIRECTION GENERALE

N° 008387 ANMAPS/DG

Liste des produits éclaircissants identifiés contenant du mercure interdits au Gabon

N.B : Il s'agit d'une liste non exhaustive qui sera mise à jour de façon continue

Item	Marque/Nom du produit	Visuel	Teneur en Mercure (ppm)
1	Aneeza Gold Beauty Cream with Avocado & Aloe Vera		12 400

AGENCE NATIONALE DU MÉDICAMENT ET DES AUTRES PRODUITS DE SANTÉ

Directeur Général

Figure 3: Snapshot image of the list of mercury-added SLPs published by ANMAPS, Gabon (July 2025)

[16] https://anmaps.ga/communique-de-presse
[17] https://www.zeromercury.org/projects/mercury-added-skin-lightening-creams-campaign-database/

National Alerts – Sri Lanka:

The Consumer Affairs Authority (CAA) Sri Lanka is responsible for enforcing consumer protection laws, regulating product safety standards, and safeguarding public health by monitoring and controlling the distribution of goods in the domestic market. In 2025, the CAA undertook laboratory testing of SLPs sold across Sri Lanka, prompted by concerns that some products contained high levels of mercury. Based on these analyses, the CAA published a list[18] of 49 products that consumers should avoid due to unsafe composition and potential health risks. The CAA's warning was accompanied by a gazette notification outlining the permissible limits for heavy metals such as mercury, arsenic, lead, and cadmium in cosmetic products available in Sri Lanka. The list functions similarly to a detention list — a tool used internationally by regulatory authorities to flag and restrict products found to be hazardous or non-compliant with national legislation. In parallel with this list, the CAA has actively carried out market surveillance and enforcement operations, seizing unauthorized whitening creams and other substandard cosmetic products, resulting in the confiscation of unsafe confiscations and initiation of penalties against vendors.

4.2 Analysis of Suspected Products via Sampling and Testing

To verify the presence of mercury in suspected products, a sampling and analysis protocol can be employed once resources are available.

Under the GEF 10810 Project, a revised **Sampling and Analysis Protocol for Suspected Mercury-Added Skin Lightening Products**[19] was developed that can be used as a key reference or guidance document for selecting SLP samples that may have a higher risk of containing mercury and conducting screening or analysis of samples via equipment.

Section 2.1 of the aforementioned *sampling and analysis protocol* provides a review of common indicators on Hg SLPs found on the global market. These may include packaging details such as ambiguous or misleading ingredients lists, use of key marketing words such as "skin bleaching" or "skin whitening", etc. High-risk countries of manufacture or distribution can also be identified

[18] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/http://consumeraffairs.gov.lk/images/2025/hazardous%20skin.pdf

[19] BRI (2026) Sampling and Analysis Protocol for Suspected Mercury-Added Skin Lightening Products. ENGLISH version: https://briwildlife.org/wp-content/uploads/2026/05/Sampling-Protocol-and-Analysis-Guidance_Hg-SLPs.pdf; FRENCH version: https://briwildlife.org/wp-content/uploads/2026/05/2026-Protocole-dechantillonnage-et-directives-danalyse_Limites-de-concentration-de-mercure-SLP.pdf

from the global database[20] developed under the project which can contribute to establishing risk profiling parameters. While these indicators do not in themselves confirm the presence of mercury, they are consistent with patterns observed in products that have previously been found to contain mercury. It is important to note, however, that mercury has also been detected in some products that do not display these irregularities, underscoring the benefit of analytical testing and/or access to reference national or global databases to confirm compliance.

During physical inspections, authorities should employ standard safety precautions such as the use of safety gloves and avoidance of product inhalation or ingestion. Any handling, sampling or testing should be conducted only by authorized personnel or laboratories, and relevant health and environmental authorities should be notified immediately.

By applying a risk-based targeting approach, officers can focus their efforts on shipments/distributions with the greatest likelihood of containing mercury-added SLPs, maximizing efficiency and enforcement impact.

In terms of analysis of mercury-added SLPs, various methods are outlined in Section 3.0 of the Sampling and Analysis Protocol. One example of the type of screening equipment that has been utilized under the GEF 10810 Project is detailed below.

[20] https://storymaps.arcgis.com/stories/64b0664f98d347c3ab226b51267bd805

Example of Screening Equipment Used for Identification of Mercury in Mercury-added SLPs

Various analytical equipment can be used to screen or analyze products for mercury. One of the more common screening equipment that may be used is an X-ray Fluorescence (XRF) analyzer. Details on the use of this type of equipment is provided as follows:

DISCLAIMER: The purpose of this description is not to endorse the procurement or use of any particular equipment but solely to provide further practical examples of how mercury-added SLPs may be monitored via sampling and testing methods.

The use of XRF analyzers for rapid identification of mercury in suspected products:

- **Non-Destructive Testing:** XRF analysis is a non-destructive method of testing a product. The product sample does not need to be damaged or altered in any way, allowing for further analysis or testing on the same sample if necessary.
- **Rapid Analysis:** XRF can provide results in a short space of time (between 30 seconds to 5 minutes), which is essential in fast-paced regulatory settings, such as border control.

  Portable and Versatile: Many modern XRF devices are portable, allowing inspectors or enforcement officers to test products directly at the point of inspection, such as at customs checkpoints, retail outlets, or warehouses.
- **Relatively Cost-Effective:** XRF analyzers, can be more cost-effective compared to traditional laboratory analytical equipment that may require further maintenance and components.

Cons for XRF analyzer use include:

- **Higher detection limit:** SLP samples containing mercury below the analyzer's detection limit may display as "<LOD" even though the actual mercury concentration may still be between 0-40 ppm.
- **Technical limitations:** XRF can have reduced sensitivity to light elements and dependence surface composition, which may lead to inaccurate readings if the sample is contaminated or not representative.

- **Adherence to radiation safety protocols:** Although radiation exposure is low when using an XRF, users need to abide by strict safety protocols to prevent accidental harm.
- **Personal protective equipment:** Before using and XRF, individuals are required to wear the necessary PPE including laboratory gloves.
- **Equipment and maintenance costs:** The purchase, maintenance, calibration, operation and other related costs of an XRF analyzer can represent a significant financial investment for agencies and laboratories.

A demonstration video on how to use a XRF Analyzer is available at the following web link:
https://briwildlife.org/wp-content/uploads/2026/05/XRF-Video.mp4

XRF analyzers can be viable options for non-destructive elemental analysis, but in order to determine its sustainable use by Customs officers or other enforcement stakeholders, its limitations and important safety considerations must be evaluated. Regulatory compliance is also essential, as operating an XRF device may require specific licenses or certifications depending on regional/national laws.

Other screening and analytical tools that may be used to assess the presence of mercury in suspected products includes, *but is not limited to*, rapid mercury vapor analyzers; Direct Mercury Analyzers; and analytical equipment that can be used to analyze a range of elements/compounds such as Inductively Coupled Plasma Mass Spectrometry or Cold Vapor Atomic Absorption Spectroscopy, among other relevant equipment.

The procurement or use of any screening or analysis equipment should be adequately evaluated based on financial and technical resources available.

4.3 Enhancement of Standard Operating Procedures and Documentation Requirements for Monitoring Cosmetics

Customs and enforcement authorities must adhere to their governing protocols and standard operating procedures. To support the monitoring and elimination of mercury-added SLPs, national authorities must be supported by the development of clear standards and protocols to control the types of products allowed in their countries. This may include the development of clear

requirements for importers and distributors of cosmetics (including SLPs), improvement of classification codes for cosmetics and other measures to ensure that national bans on mercury-added SLPs are clearly incorporated into standard operating procedures. Further examples and guidance are provided as follows.

4.3.1 Improving Requirements for Monitoring Cosmetic Products

The case study below provides an example of how existing mechanisms can be used to improve requirements for importers of cosmetics (including SLPs), enhance the ability of Customs and enforcement authorities to monitor imports, and enhance consumer awareness.

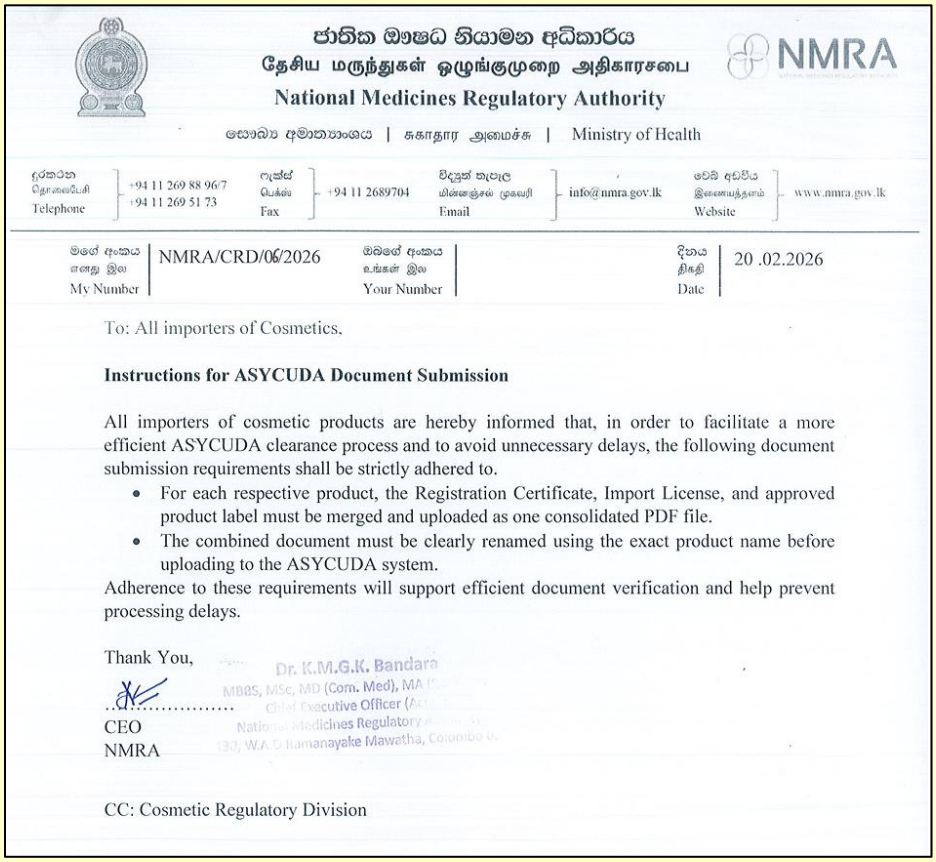
Sri Lanka Case Study: Use of Automated System for Customs Data (ASYCUDA)

In Sri Lanka, the National Medicines Regulatory Authority (NMRA) played a central role in the control of SLPs, including market surveillance, mandatory licensing, and regulatory approval under NMRA frameworks.

To enhance the ability of Customs authorities and other agencies to monitor and prevent importation of mercury-added SLPs, a public notice was published in February 2026 by the NMRA that instructs all importers of cosmetic products in Sri Lanka to submit all relevant documents regarding the products to their ASYCUDA platform[21] as part of the importation clearance process. For each product, its exact name and approved product label must be provided for review which enables easier product tracking and verification. Other regulatory requirements such as registration certificates and import licenses must also be provided, meaning that the products must meet the standards outlined under national regulations.

The NMRA also progressed regulatory strengthening measures, including updates to cosmetic legislation and the development of implementing regulations under the proposed Cosmetic Devices and Drugs framework which is currently under review. The draft Act was circulated for stakeholder consultation in November 2025, and further revisions were communicated in December 2025. In parallel, the NMRA has updated its registry of cosmetic products to support consumer awareness and enable identification of legitimate, compliant cosmetics that meet national safety and quality standards[22].

[21] ASYCUDA was developed by the United Nations Conference on Trade and Development (UNCTAD) to assist countries in automating there customs procedures via a digital customs management system.
[22] https://www.nmra.gov.lk/pages/cosmetics



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தேசிய மருந்துகள் ஒழுங்குமுறை அதிகாரசபை
National Medicines Regulatory Authority
සෞඛ්‍ය අමාත්‍යාංශය | சுகாதார அமைச்சு | Ministry of Health

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මගේ අංකය எனது இல My Number: NMRA/CRD/06/2026
ඔබගේ අංකය உங்கள் இல Your Number:
දිනය திகதி Date: 20 .02.2026

To: All importers of Cosmetics.

Instructions for ASYCUDA Document Submission

All importers of cosmetic products are hereby informed that, in order to facilitate a more efficient ASYCUDA clearance process and to avoid unnecessary delays, the following document submission requirements shall be strictly adhered to.

- For each respective product, the Registration Certificate, Import License, and approved product label must be merged and uploaded as one consolidated PDF file.
- The combined document must be clearly renamed using the exact product name before uploading to the ASYCUDA system.

Adherence to these requirements will support efficient document verification and help prevent processing delays.

Thank You,

Dr. K.M.G.K. Bandara
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.....
CEO
NMRA

CC: Cosmetic Regulatory Division

Figure 4: Snapshot image of public notice to all importers of cosmetics in Sri Lanka published by NMRA. (NMRA, 2026)

4.3.2 Enhancement of Product Classification Codes

In terms of Customs nomenclature codes to better identify categories of goods being imported or traded internationally, the voluntary development of more specific codes for classification of mercury-added products listed in Annex A of the Minamata Convention on Mercury has been encouraged[23]. Generally, global Custom nomenclature codes follow the same format as the Harmonized Commodity Description and Coding System (HS) codes under the International Convention on the Harmonized Commodity Description and Coding System, which is managed by the World Customs Organization (WCO) who maintain periodic updates to coding classifications. HS Codes are typically split into 6-digit formats to categorize according to chapters, headings and subheadings.

23 https://minamataconvention.org/sites/default/files/documents/working_document/4_27_CustomsCodes.English.pdf

In the COP6 information document *Study of the Global Supply, Production, Trade and Use of Mercury Compounds*[24], challenges in HS Code classifications for mercury compounds were identified. While HS Code 285210 is considered the most reliable indicator for global trade in chemically defined mercury compounds, trade statistics under this code aggregate many mercury compounds together, limiting the ability to identify specific substances. Data from Comtrade and Trade Data Monitor also show significant limitations, including customs misclassification, inconsistent reporting, and difficulty distinguishing commercial products from laboratory reagents, byproducts, or waste shipments. Several Parties, including Belgium, Thailand, Spain, and Italy, identified substantial discrepancies in reported trade volumes due to coding errors.

Countries can determine their own Customs codes with further sub-headings resulting in 8- to 10-digit breakdowns (or more) based on their national procedures without consulting the WCO. For example, to further identify mercury-added products, Uruguay undertook a Customs code update in 2019 in which they formally notified the World Trade Organization (WTO) of a quantitative restriction prohibiting the importation of products containing mercury[25]. This measure, based on Decree No. 15/019 of 23 January 2019[26], is intended to protect human health and the environment and aligns with Uruguay's obligations under the Minamata Convention on Mercury. The notification, submitted under the WTO's quantitative restrictions reporting procedures (G/MA/QR/N/URY/6), identifies specific tariff lines under the MERCOSUR Common Nomenclature, extended beyond six digits, which cover mercury-containing products such as fluorescent lamps, high-discharge mercury vapor lamps, and thermometers. By notifying this measure to the WTO, Uruguay ensures transparency and compliance with GATT 1994 provisions allowing restrictions to protect life, health, and exhaustible natural resources.

Tracking SLPs is challenging as in some cases, they may fall under broad categories for pharmaceuticals (such as HS Code 3004 - medicaments packaged for retail sale) or broad categories for cosmetics (such as HS Code 3304- beauty, makeup, and skincare preparations), which include products such as creams, lotions, and skincare formulations. While extending HS codes for mercury-added SLPs could improve trade monitoring, it may be more effective to expand and refine HS codes used for the manufacture and trade of mercury compounds themselves, since these substances are the primary inputs to mercury-added SLP production.

[24] UNEP-MC-COP6-INF05-Compounds_Trade_Study_English.pdf
[25] Maung, K.N. (2025) HS Codes for Mercury-added Products [POWERPOINT PRESENTATION]. 3 June. Sub-regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products, Colombo, Sri Lanka
[26] https://qr.wto.org/en/qrs/4862/10861

The current six-digit HS codes are: 285200 for inorganic or organic mercury compounds, 285210 for chemically defined compounds and 285290 for other mercury compounds can be further broken down nationally (or in collaboration with regional or international bodies) into more specific 8- or 10- digit codes to strengthen tracking of specific mercury compounds that may be used largely for mercury-added SLP/cosmetic production.

4.3.3 Developing Standard Operating Procedures (SOPs) for Enforcement Agencies[27]

Well-developed and regularly updated Standard Operating Procedures (SOPs) serve as a strategic tool for planning, risk analysis, and the inspection of shipments. SOPs provide a reliable, centralized source of guidance that can adapt to evolving operational needs while ensuring alignment with international standards. Key elements of domestic SOPs should include procedures consistent with the Minamata Convention and national legislation, clearly defined roles and responsibilities for Customs officers and other enforcement stakeholders, and detailed processes for managing imports, exports, transit shipments, and other trade scenarios involving mercury, mercury-added products, and mercury wastes. By institutionalizing these procedures, Customs and enforcement authorities can improve efficiency, enhance compliance, and strengthen enforcement against illicit trade.

The main elements of an SOP for the control of mercury-added SLPs (and other mercury-related goods) should include:

- Clear regulatory framework outlining applicable international and domestic requirements;
- Procedures and framework for controlling manufacture, import, export and trade;
- Guidance for the identification of prohibited goods, risk management, and the conduct of enforcement operations, ensuring that safety measures and personal protective equipment are consistently applied; and
- Promote cooperation, where applicable, with competent authorities and other stakeholders, fostering information sharing and coordinated action across agencies and sectors.

[27] Kobylecka, A. (2025) 'Developing National Action Plans on SOPs for Enforcement Agencies' [POWERPOINT PRESENTATION]. 2 June. National Training on Strengthening Country-Level Inter-Agency Coordination on Illegal Trade of Mercury. Colombo, Sri Lanka. World Customs Organization

For developing SOPs for managing mercury-added SLPs (and other mercury-related goods), the document, “Guidelines for Customs Administrations for Developing Standard Operating Procedures (SOPs) for controls of waste shipments”[28] developed by the World Customs Organization (WCO) can be a useful example for adaptation to the context of mercury-added SLPs. The principles, structures, and best practices outlined in the documents such as risk assessment and stakeholder coordination can be adapted and tailored to the specific requirements, helping authorities design effective, compliant, and practical SOPs.

5.0 Conclusion

Once a country is Party to the Minamata Convention on Mercury, they are obligated to take measures to phase out mercury-added products including mercury-added SLPs. Challenges in identifying and monitoring mercury-added SLP manufacture, trade and disposal persist, and as such, monitoring and enforcement measures to eliminate these harmful cosmetics should include the use of clear techniques and cooperation amongst a wide network of national, regional and global entities. For effective enforcement at the national level, Customs authorities and other relevant authorities such as national health regulators, environmental agencies, law enforcement bodies, prosecutors, consumer affairs and other related entities must be sensitized and trained on the issue. The enhancement of public awareness through the publication of prohibited product listings and information sharing at both national and international levels are essential to prevent repeat violations and dismantle trade networks for the mercury-added SLP supply chain.

Eliminating mercury-added SLPs is a complex, multi-step process that requires vigilance at every stage, from identifying products before they enter the market to ensuring their safe handling and/or destruction after confiscation. The primary goal is to protect public health and the environment by removing harmful products and holding those responsible for their manufacture and trade accountable. By following these procedures, authorities can help safeguard consumers from the dangers posed by mercury in cosmetics while reinforcing strict import and health regulations.

[28] https://www.wcoomd.org/en/topics/enforcement-and-compliance/instruments-and-tools/guidelines/guidelines-for-customs-administrations-for-developing-sops-for-controls-of-waste-shipments.aspx

Annex 1: Summaries of Relevant Customs and Enforcement Training conducted between 2025 -2026

Summaries of work conducted under GEF 10810 Project, “Eliminating Mercury Skin Lightening Products (Jamaica, Gabon and Sri Lanka)” project are provided in the following hyperlinks:

- Sri Lanka National Training on Strengthening Country-level Inter-agency Coordination on Trade of Mercury Summary Report *(conducted in joint collaboration with the “Project for promoting the Minamata Convention on Mercury by making the most of Japan's knowledge and experiences”)*
- Sri Lanka Sub-Regional Customs Training to Enhance Monitoring of Trade of Mercury, Mercury Compounds and Mercury-added Skin Lightening Products Summary Report *(conducted in joint collaboration with the “Project for promoting the Minamata Convention on Mercury by making the most of Japan's knowledge and experiences”)*
- Summary of Jamaica Customs and Enforcement Webinar
- Summary of Gabon Customs and Enforcement Training Materials

Summaries of work conducted under the “Project for promoting the Minamata Convention on Mercury by making the most of Japan's knowledge and experiences” funded by the Government of Japan and implemented by UNEP are provided in the following hyperlinks:

- Experiences in Mercury Trade Control: Lessons Learnt Under the Project for Promoting the Minamata Convention on Mercury by Making the Most of Japan's Knowledge and Experiences

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

Annex 2: Additional Guidance Manuals and Operational Training Materials Supporting Customs and Enforcement Authorities in Controlling Trade of Mercury, Mercury Compounds, and Mercury-added Products

To facilitate effective surveillance and control, various resources and databases have been developed to document and monitor mercury-added products including SLPs. While certain resources may not specifically identify mercury-added SLPs, their analytical and regulatory frameworks remain applicable. Some documents include:

- The **Guidelines for Customs Administrations for Developing Standard Operating Procedures (SOPs) for controls of waste shipments**[29] developed by the World Customs Organization (WCO) was referenced in Section 4.3.3 of this document as a useful guide for developing mercury-added SLP SOPs.

- **The Green Customs Guide**[30] to MEAs serves as a practical training and reference tool for Customs officers. It is designed to support understanding of key environmental treaties, including the Minamata Convention on Mercury, and to strengthen Customs' ability to facilitate legitimate trade while detecting and preventing illegal trade in regulated and unregulated environmentally sensitive goods, including mercury-added products. The Guide provides enforcement-oriented guidance relevant to the control of mercury-added products. It explains how Customs authorities can identify and inspect potentially non-compliant shipments, make effective use of HS codes, and cooperate with national authorities and international organizations for technical and technical assistance (e.g. environmental and health authorities, the Basel Convention, and the WCO). It also outlines general procedures for the verification, detention, seizure, and environmentally sound disposal of prohibited or illegally traded consignments.

  While the Green Customs Guide is not a regulatory or legally binding instrument, it is a capacity-building resource that:

  - Supports Customs officers in understanding MEA obligations—such as phase-out measures and trade restrictions under the Minamata Convention—and their implications for border control operations; explains relevant terminology, documentation requirements, and inter-agency and international cooperation mechanisms associated with MEAs; and

[29] https://www.wcoomd.org/en/topics/enforcement-and-compliance/instruments-and-tools/guidelines/guidelines-for-customs-administrations-for-developing-sops-for-controls-of-waste-shipments.aspx
[30] https://wedocs.unep.org/items/52da1640-9462-488c-a8d8-8ed1f9b18b3a

- Provides a framework for integrating environmental trade controls, including those related to toxic substances such as mercury, into routine Customs risk management and inspection procedures.

Although the Guide does not list specific mercury-containing cosmetic products or provide analytical testing methods, it reinforces the Customs role in:

- Remaining vigilant for products, including cosmetics, that may contain mercury in violation of the Minamata Convention and corresponding national legislation; and
- Coordinating with competent environmental and public health authorities to detain, report, and take appropriate action on suspected illegal shipments.

This approach aligns with broader international guidance on the control of hazardous chemicals in international trade.

- The 2014 **Manual for Customs Officers on Hazardous Chemicals and Wastes under the Basel, Rotterdam and Stockholm Conventions**[31] is also a training and reference tool for Customs officers to understand how these conventions work together to regulate hazardous chemicals and wastes through their entire life cycle. The manual explains how customs authorities should handle transboundary movements of hazardous chemicals and wastes including applying the Basel Convention's control procedures when hazardous wastes are traded across borders and understanding the Rotterdam Convention's PIC procedures for listed hazardous chemicals. Customs officers are trained to screen documentation, use product codes, inspect shipments, and identify consignments that may contain hazardous chemicals or waste. This includes being alert to misdeclared or disguised shipments that should not cross borders legally. A key focus of the manuals is helping Customs distinguish between illegal and legal traffic, and any movement that does not comply with the Convention's procedures.

[31] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.brsmeas.org/Resources/Shared/scripts/appPubKit/docs/04b-BaselConvention-ManualForCustomsOfficers.English.pdf

The Basel Convention Training on Illegal Traffic for Customs and Enforcement Agencies[32] explains how Customs and enforcement authorities should prevent, detect, and respond to illegal transboundary movements of hazardous waste. It defines illegal traffic as any movement of hazardous waste that occurs without proper notification or consent, is based on fraud or false information, does not match the accompanying documentation, or results in disposal that violates the Convention or international law. The manual emphasizes the frontline role of customs officers in identifying suspicious shipments through documentation checks, inspections, and risk indicators, and in detaining and securing shipments when illegal traffic is suspected. It stresses the importance of following national laws that implement the Basel Convention, properly documenting evidence, and immediately notifying the competent environmental authority. The manual also highlights that effective enforcement depends on strong cooperation among customs, environmental agencies, police, prosecutors, and international partners, and that parties to the Convention are required to treat illegal traffic in hazardous waste as a criminal offense.

Together, these resources strengthen regulatory and enforcement capacity by enhancing awareness, detection, and coordinated action against the illegal trade of mercury, mercury compounds, and mercury-added products, including skin-lightening products, across borders.

[32] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.basel.int/Portals/4/Basel%20Convention/docs/legalmatters/illegtraffic/trman-e.pdf

END OF DOCUMENT