

GEF-8 PROJECT IDENTIFICATION FORM (PIF)

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General Project Information

Project Title

Elimination of Mercury-Added Skin Lightening Products (SLPs) in Africa

Region

Regional

GEF Project ID

11877

Country(ies)

Regional

Burkina Faso

Comoros

Cote d'Ivoire

Ethiopia

Guinea

Madagascar

Mauritania

Niger

Nigeria

Sierra Leone

South Africa

Togo

Uganda

Type of Project

FSP

GEF Agency(ies):

UNEP

GEF Agency ID

Executing Partner

Biodiversity Research Institute (Lead EA)

UNEP Global Mercury Partnership (Execution Support)

World Health Organization

Executing Partner Type

CSO

GEF Agency

Others

GEF Focal Area (s)

Chemicals and Waste

Submission Date

3/5/2025

Project Sector (CCM Only)

Mixed & Others

Taxonomy

Influencing models, Strengthen institutional capacity and decision-making, Convene multi-stakeholder alliances, Transform policy and regulatory environments, Demonstrate innovative approaches, Stakeholders, Private Sector, Large corporations, SMEs, Individuals/Entrepreneurs, Beneficiaries, Local Communities, Civil Society, Community Based Organization, Non-Governmental Organization, Academia, Trade Unions and Workers Unions, Type of Engagement, Information Dissemination, Partnership, Participation, Consultation, Communications, Awareness Raising, Education, Public Campaigns, Behavior change,

Capacity, Knowledge and Research, Knowledge Exchange, Capacity Development, Targeted Research, Innovation, Knowledge Generation, Learning, Gender Equality, Gender Mainstreaming, Women groups, Sex-disaggregated indicators, Gender-sensitive indicators, Gender results areas, Participation and leadership, Knowledge Generation and Exchange, Access to benefits and services, Focal Areas, Chemicals and Waste, Best Available Technology / Best Environmental Practices, Disposal, Mercury, Sound Management of chemicals and waste, Waste Management, Hazardous Waste Management

Type of Trust Fund	Project Duration (Months)
GET	72
GEF Project Grant: (a)	GEF Project Non-Grant: (b)
15,000,000.00	0.00
Agency Fee(s) Grant: (c)	Agency Fee(s) Non-Grant (d)
1,350,000.00	0.00
Total GEF Financing: (a+b+c+d)	Total Co-financing
16,350,000.00	76,626,454.00
PPG Amount: (e)	PPG Agency Fee(s): (f)
300,000.00	27,000.00
PPG total amount: (e+f)	Total GEF Resources: (a+b+c+d+e+f)
327,000.00	16,677,000.00
Project Tags	
CBIT: No NGI: No SGP: No Innovation: No	

Project Summary

Provide a brief summary description of the project, including: (i) what is the problem and issues to be addressed? (ii) what are the project objectives, and if the project is intended to be transformative, how will this be achieved? (iii), how will this be achieved (approach to deliver on objectives), and (iv) what are the GEBs and/or adaptation benefits, and other key expected results. The purpose of the summary is to provide a short, coherent summary for readers. The explanation and justification of the project should be in section B "project description". (max. 250 words, approximately 1/2 page)

The proposed project aims to support Parties to the Minamata Convention on Mercury in fulfilling their obligations under Article 4 by phasing out mercury-added skin lightening products (SLPs). It seeks to replicate best practices across Africa, targeting both manufacturing and non-manufacturing countries. The project will focus on eliminating mercury-added SLPs from both physical and online sale channels, and encouraging voluntary pledges from online platforms. Through limiting access of these products and fostering an enabling environment, the project will encourage the adoption of institutional and legal frameworks to reduce both formal and informal manufacturing, trade, and distribution of these products. Additionally, the procurement of detection equipment will enhance laboratory capacity and improve understanding of trade trends. To reduce demand for use of SLPs, the project will also conduct comprehensive behavioral studies to understand user motivations and attempt to reduce usage. Furthermore, considering the end of life of these products, the project will strengthen capacities for their sound management. To further ensure consumer safety, the project will expand compliance and enforcement efforts, including training customs and trade officials, creating detention lists and surveillance systems. Moreover, the project will foster global awareness and knowledge sharing in collaboration with various stakeholders. Gender mainstreaming, along with the engagement of youth and marginalized communities, will be a key priority. The phase-out of SLPs in target

countries is expected to reduce mercury emissions by 14 tons. This will benefit over 7.8 million people, including 6.3 million women and 1.5 million men.

Indicative Project Overview

Project Objective

To reduce the manufacture, trade, sale and use of mercury added skin lightening products in Africa

Project Components

1. Strengthening legal and regulatory framework to manage mercury added SLPs

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
2,717,840.00	16,466,733.00

Outcome:

1. Comprehensive regulatory frameworks are in place to manage mercury added SLPs

Output:

Output 1.1: Institutional capacities improved to reduce the manufacture, import, export and distribution of mercury added SLPs in line with the Minamata Convention

Output 1.2: Roadmap developed by national authorities to discontinue formal and informal manufacture and sale of mercury added SLPs

Output 1.3: Linkages between levels of mercury in human samples based on SLP use and health impacts analysed and investigated in selected countries

2. Enhancing supply chain management and controls

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
3,383,905.00	18,175,842.00

Outcome:

2. Mercury added SLPs trading patterns and user behaviors understood and waste appropriately disposed

Output:

Output 2.1: Mercury added SLP manufacturing and trading patterns understood through improved product identification and testing (both in store and online)

Output 2.2: Document behavioral change in SLP users based on better understanding of motivations

Output 2.3: Comprehensive waste management approaches assessed

3. Strengthening enforcement and consumer safety controls

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
3,519,988.00	16,294,076.00

Outcome:

3. Enhanced enforcement and compliance to reduce manufacturing and trade of mercury added SLPs

Output:

3.1 National capacities to carry out regular monitoring and inspection of SLPs improved

3.2 Enforcement actions carried out against non-compliant actors (related to manufacturing, import, export, and sales)

4. Knowledge management and awareness raising

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
4,028,267.00	21,089,803.00

Outcome:

4. Improved and disseminated knowledge on phasing out mercury added SLPs

Output:

4.1 Knowledge products and communication campaigns with gender specific information developed and disseminated nationally and regionally

4.2 Knowledge products and communication campaigns with gender specific information developed and disseminated globally

M&E

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
600,000.00	800,000.00

Outcome:

5. Monitored and evaluation completed

Output:

5.1 Project is monitored and evaluated

Component Balances

Project Components	GEF Project Financing (\$)	Co-financing (\$)
1. Strengthening legal and regulatory framework to manage mercury added SLPs	2,717,840.00	16,466,733.00
2. Enhancing supply chain management and controls	3,383,905.00	18,175,842.00
3. Strengthening enforcement and consumer safety controls	3,519,988.00	16,294,076.00
4. Knowledge management and awareness raising	4,028,267.00	21,089,803.00
M&E	600,000.00	800,000.00
Subtotal	14,250,000.00	72,826,454.00
Project Management Cost	750,000.00	3,800,000.00
Total Project Cost (\$)	15,000,000.00	76,626,454.00

Please provide justification

• Building on the success of the ongoing Medium Size Project (MSP) SLPs (GEFID 10810, 2022-2025), this project will expand its reach and enhance its impact across both manufacturing and non-manufacturing countries in Africa, covering both Anglophone and Francophone regions. Achieving this will require substantial resources for effective coordination, efficient meeting organization, exchange of experiences and learnings, and the proper management and dissemination of knowledge among participating countries and broader stakeholders. • A key focus of the initiative will be the accurate detection of mercury-added SLPs, achieved through the procurement of state-of-the-art equipment and comprehensive training—both of which will require dedicated resources. This will empower laboratories across the region to track trade trends and bolster regulatory compliance. In addition, the project will foster synergies and collaboration with regional mercury monitoring laboratories to strengthen the network. • Significant resources will be allocated to understating the drivers and raising awareness and influencing consumer behavior around skin lightening practices. Prominent influencers and celebrities will be engaged in targeted communication campaigns to amplify key messages on local, regional, and global scales. Their participation will enhance outreach, shape public perception, and resonate especially with youth.. This will include efforts to combat colorism, celebrate

cultural heritage, promote natural beauty standards, advocate for human rights, and highlight the harmful effects of these practices. • The project will take a holistic, multi-faceted approach to address the full lifecycle of skin lightening products—from production and trade to sale, demand, and safe disposal for both formal and cottage industry in physical and online markets. This approach will integrate behavioural, regulatory and enforcement interventions and will require significant resources for effective coordination at national, regional, and global levels to ensure lasting impact and sustainability.

PROJECT OUTLINE

A. PROJECT RATIONALE

Briefly describe the current situation: the global environmental problems and/or climate vulnerabilities that the project will address, the key elements of the system, and underlying drivers of environmental change in the project context, such as population growth, economic development, climate change, sociocultural and political factors, including conflicts, or technological changes. Describe the objective of the project, and the justification for it. (Approximately 3-5 pages) see guidance here

1. Global Environment and Health Problems and Current Situation of Mercury SLPs in Africa

Skin-lightening, whitening, and bleaching products are widely used and a common practice in many parts of the world. These products significantly affect both men and women in Africa, Asia, Middle East, the Caribbean and even in developed nations in Europe and North America, posing both public health and environment concerns. Skin lightening is the practice of using pharmacologically active ingredients for cosmetic purposes to whiten the skin, which includes the face, hands, legs, and any part of the body. In West Africa, between 26% and 76% of women use skin lightening products^[1]. Since the late 1960s, skin lightening products (SLPs) have been a common household product in Sub-Saharan Africa^[2].

SLPs come in different forms (creams, soaps and in some cases injections), commonly contain harmful and pharmacologically active ingredients, such as mercury, hydroquinone, corticosteroids, arsenic, kojic, glycolic and other fruit acids (most of which do not appear on package labels of SLPs). When used without medical supervision or misused for cosmetic purposes many of these ingredients have adverse health effects on the user. Mercury (inorganic form as mercury salts, including mercuric amido chloride, mercurous chloride etc.) is highly effective in blocking melanin-producing functions in the human skin leading to a lighter skin tone^[3]. The fact that mercury can be replaced with other hazardous ingredients such as corticosteroids, it is important to understand the motivations behind using these products and introduce interventions that will lead to reduction in practice of skin lightening in general.

Exposure to mercury is especially concerning in women of reproductive age because it can cross the placenta and interfere with neurological development of the unborn child. Exposure to mercury can also lead to spontaneous abortion, low birth weight, and miscarriages^[4]. The impact mercury can have on women's health include not only on their reproductive health but also on negative kidney effects, neurological problems, and early childhood developmental problems. Consumers and manufacturers of mercury added SLPs may be unaware of the dangers associated with using them.

The danger does not just exist for those who use mercury added skin lightening products but also for their families who may become exposed in the home through a variety of contact points, including by using washcloths or towels contaminated with mercury, washing clothes, through skin-to skin-contact or even by inhaling mercury vapor. Moreover, release of mercury through the application of the SLP can further contaminate the surrounding environment and contributes to global mercury pollution. Through washing and showering, the mercury in creams, soaps and other cosmetic products containing mercury that haven't evaporated is eventually discharged into wastewater. This leads to impacts on water quality, potentially leading to mercury methylation and bioaccumulation in fish and other organisms, eventually contaminating human food supplies. Moreover, improper disposal and widespread use of mercury in skin-

lightening products expand beyond individual health risks, highlighting potential consequences on a regional and global scale.

Despite the known risks associated with skin-lightening products, many people continue to use these products. The motivation for continuing to use these products even when informed of the dangers varies by individual. Colorism—a deep-rooted form of skin color discrimination^[5] is a major factor. This reinforces beauty standard concerns, social status pressures, societal perceptions, and the influence of social media, ultimately lead individuals to use harmful skin-lightening products. The historical and cultural association between skin color and social status is one of the motivations that drives people to practice skin lightening in many countries, particularly in regions that have faced colonialism.

In Africa, skin-lightening products are predominantly manufactured in South Africa, Cote d'Ivoire, Nigeria, Ghana, and Togo^[6], but many products are also imported from countries such as Pakistan and Thailand. A notable trend which exacerbates the SLP issue is the increasing practice of mixing products with other ingredients at the seller's home. Many individuals across the project countries promote these products on social media platforms, including content demonstrating the mixing procedures of SLPs. This trend of cottage, informal, at-home SLPs production is on the rise, allowing consumers to access these products through a variety of markets and online platforms.

Ghana, Gambia, Kenya, Nigeria, South Africa, Uganda, Zimbabwe and Zambia, have banned the use and import of mercury and hydroquinone in cosmetic products but even with this ban, these ingredients are still found in skin lightening products sold in these countries^[7]. Other project countries are also working on legislations to ban the use of mercury and other harmful substances present in SLPs. However, illegal import and sale of mercury added SLPs, whether in physical markets or through online platforms, continue to proliferate across the region. Additionally, consumers also purchase them abroad and bring them back to their home countries in their personal luggage.

With the entry into force of the Minamata Convention on Mercury in 2017, Parties to the Convention were initially required to phase out the manufacture, import, and export of mercury SLPs over the detection limit of 1 ppm under the provision of Article 4 by 2020. The phase out is also related to other Articles under the Convention, Article 16 (health), Article 17 (information exchange), and Article 18 (public information, awareness and education). Furthermore, as part of the COP5 decision, Parties took a historical step by adopting a complete ban of mercury in SLPs, a move that reflects the collective action to safeguard human health and the environment. While the 2020 phase out deadline of mercury SLPs stands valid and has proven to be challenging for many Parties globally, a new phase out date of all mercury added SLPs (including below 1 ppm) was set as another ambitious deadline in 2025. COP5 also decided in decision MC-5/5 to collect information on challenges in preventing manufacture, import and export of mercury-added SLPs for consideration at COP6 in November 2025. This symbolizes the importance of this project in assisting the Parties of the Minamata Convention in fulfilling their obligations.

2. Root causes and barriers to be addressed

Given the zero tolerance policy on mercury use in cosmetics including SLPs and the complexity of the issue related to manufacturing, import, export, distribution, advertising, marketing sale, use and disposal, the project is designed to address the following root causes.

2.1 Inadequate legal, regulatory and/or policy framework for mercury SLPs

The absence of a comprehensive legal and policy framework at national level to phase out mercury-added SLPs remains a significant challenge, especially in banning their manufacture and trade. This gap often includes the lack of regulations on licensing, labeling and advertising requirements, trade and distribution registrations. There is a need for, enhanced capacity and authority to test and identify products containing mercury, effective regulations of informal or cottage manufacturing and sales, and clear guidance on environmentally sound disposal practices. Additionally, coordination and collaboration between various Ministries and regulatory agencies at the national level is often insufficient or unclear, hindering regional policy coherence and harmonization in areas such as trade patterns, compliance, and enforcement—both in physical and online markets. Without a robust, integrated framework that targets both the supply

and demand of SLPs, the availability and accessibility of mercury-added SLPs will only increase. Furthermore, countries with existing legal frameworks face enforcement and compliance challenges, particularly due to the widespread informal manufacturing, trade, and sale of these products. Finally, limited biomonitoring is being conducted in the target countries to assess mercury exposure pathways and levels. Expanding biomonitoring efforts could help raise awareness, inform public health officials, and highlight the need for regulatory reforms.

2.2 Insufficient capacity on identification, testing and disposal of mercury SLPs and a limited understanding of motivations for SLPs use

Despite the growing market for SLPs including mercury added SLPs and its illegal trade, there is a significant lack of capacity to identify, test, disallow sales, and dispose of mercury added SLPs. Many developing countries face resource and test capacity constraints, including the lack of laboratories and the technical expertise needed to procure, operate, and maintain testing equipment. Surveillance monitoring and testing is crucial for identifying the source of these products, assessing their mercury concentrations, and tracking trade patterns and hubs. The absence of sound labeling on most mercury added SLPs further complicates the identification and monitoring processes. Moreover, knowledge, attitudes, and practices of different users are not fully understood, leading to lack of targeted interventions and prioritized actions to effectively influence the decision-making process. Therefore, in-depth research and analysis are required to better understand the motivations and behavior patterns of both consumers and those practitioners who promote the use these products. Finally, clear guidelines for the disposal of discarded mercury added SLPs are lacking, even in some developed countries.

2.3 Insufficient capacities related to monitoring, enforcement, penalties and online sale accountability for mercury SLPs

There is a clear lack of capacity in both developed and developing countries to conduct enforcement against illegal manufacturing and effectively monitor and conduct market surveillance on the informal manufacturing, trade, marketing, advertising, and sale of mercury added SLPs, whether through physical sales or online platforms. Moreover, there is a significant gap in strong compliance and enforcement mechanisms concerning consumer product safety, particularly in the realm of e-commerce, which exposes notable weaknesses in regulations holding sellers accountable, conducting enforcement and assuring responsiveness. The absence of robust enforcement systems and penalties mechanisms continue to perpetuate these issues. In addition to the challenges of product identification (root case 2.2 above), there is a lack of training for customs and health officials to conduct market surveillance. For this to occur, there is clear need for the development of detention lists, surveillance systems, or alert mechanisms at the community or national level that could be easily accessed by various national stakeholders. Nevertheless, existing tools from organizations like OECD and UNCTAD^[8], along with successful experiences in product safety pledges and enhanced consumer protection on online platforms, offer valuable models. These should be considered for replication at the appropriate scale, whether through national or regional implementation approaches in larger or smaller countries, respectively.

2.4 Lack of awareness and the need to improve skin color related advertising and marketing

There is a low level of awareness and knowledge among both the public and healthcare professionals about the risks associated with mercury added SLPs. Even when the dangers are known, many users continue to engage in skin-lightening practices due to deeply ingrained historical, cultural, and societal influences, including colorism and the pressure to conform to specific beauty standards. The persistence of skin-bleaching cosmetics over centuries highlights the enduring legacy of skin bias. The practice often starts at a young age, with the risk of starting the practice become higher for young adult women looking for employment or partners; it is often introduced to the younger users by family members or close friends, which normalizes its use and creates peer pressure, further driving consumption. Additionally, the availability and affordability of the products and social acceptability of skin lightening practices together with low levels of awareness and knowledge and lack of emphasis on celebrating the beauty of all skin tones in media, marketing, and advertising only exacerbate further the issue. There is an urgent need for awareness and advocacy campaigns at

the individual, community, national, and global levels to educate the public about the collective health and environmental impacts of skin-lightening practices and to promote mindset and behavioral change.

3. Country Selection

The selection of countries for this project was based on multiple criteria:

- Be a Party of Minamata Convention
- Already identified the manufacturing, export, import and use of mercury added SLPs as one of the priority areas in the respective MIAs and/or reported to COP5 decision 5/5 on challenges in preventing the manufacture, import and export of cosmetics listed in Part I of Annex A to the Minamata Convention on Mercury as well as current or proposed measures for addressing these challenges taken by Parties
- Expressed interests, including national reporting, SIP submissions and other available data collection and analysis
- Not having received GEF support on the same topic previously or can justify additional assistance is necessary

4. Key Stakeholders

The project will develop a comprehensive stakeholder engagement plan during the preparatory phase to ensure engagement, participation and commitment of all key partner in the target countries to achieve project results, integrating public sector entities, private sector partners and other key stakeholders such as academia, research institutions and non-government organizations at the global, regional and local levels. A regional project steering committee will be established to guide the project through each of the proposed components and identify solutions to address overarching issues. Moreover, national project steering committees will be established and composed of national representatives from each stakeholder group. Regular multi-stakeholder meetings will be organized at both the regional and national levels to facilitate open dialogues and exchanges. Additionally, the global Project Stakeholder Group (PSG), created under the active SLP MSP (GEF ID 10810), will continue to operate and meet on a regular basis to further connect with external stakeholders. A clear communication strategy will also be developed at project inception to ensure all parties are informed and aligned with project objectives. As part of the PIF development, a preliminary list of stakeholders has been identified:

- **Ministries of Environment and Health** in the participating countries will serve as key government agencies to drive the project activities by leveraging and integrating them into national policies, legal frameworks, and national priorities.
- **National Environmental, Food and Drug, and/or Trading Standards and Consumer Protection agencies** will play a key role in controlling and regulating the trade and distribution of the skin lightning products in the physical and online markets.
- **Customs Agencies** will contribute to curbing the trade of the mercury, mercury compounds and mercury added skin lightning products, including monitoring, enforcement, and tackling illegal activities.
- **UNEP Global Mercury Partnership (GMP)** and its work area focused on mercury in products, mercury supply and trade, and mercury waste management, in collaboration with the partnership secretariat, will play an active role in the project, providing targeted technical assistance on policy recommendations, supply chain measures, waste management, global knowledge sharing and communications. The Project Stakeholder Group initiated under current MSP project on SLPs (GEF ID: 10810) – will further provide leverage and platform for the broader stakeholder consultation and engagement.
- **Minamata Convention Secretariat** will be closely consulted and engaged where relevant to assure compliance, improve execution of the project and share lessons learnt.
- **World Health Organization** will play a role in the project. WHO is a specialized agency responsible for providing global health matters, shaping health research agenda, setting norms and standards, articulating evidence-based policy options, providing technical support to countries and monitoring and assessing health trends. With county offices around the world, WHO will play a key role in engaging the

health sector, including Ministries of Health, medicines agencies, health care providers for prevention efforts, behavior change at individual and population levels.

- **UN Women** – engage the Ministries related to gender and/or women’s empowerment to ensure outreach to majority of the direct beneficiaries.
- **Health Professionals** – including dermatologists, community health workers and health-based associations such as the African Association for Dermatology will play a key role in disseminating public health messages and implementing health education and other interventions
- **Industry associations** such as the European Cosmetic Toiletry and Perfumery Association and the Cosmetic, Toiletry and Fragrance Association of South Africa (CTFA) will serve as an important channel for broader industry engagement.
- **Civil Society Organizations (CSOs)** in national and regional context will play a pivotal role in raising awareness and educating communities related to health risks, environmental impacts and long term consequences of using SLPs, helping to shift perceptions and behaviours. CSOs can also lobby government and regional bodies to strengthen regulations that prohibit or restrict the manufacturing, sale and use of mercury added SLPs, helping to share public policy related to cosmetic safety standards. Furthermore, CSOs can also be involved in capacity building, empowerment, monitoring and research. They can help to create an informed, mobilized and empowered society that can challenge harmful practices while promoting healthier and more sustainable beauty standards.
- **International cosmetics companies**, including ones that meet the highest environmental health and human rights standards – will be essential to strengthen the narrative for a toxic-free and inclusive cosmetic industry, both in standards and marketing.
- **Africa Beauty brands** that are leaders in promoting toxic free products and local ingredient will be involved to harness local ownership, entrepreneurship and promote African heritage and natural beauty standards.
- **Online platforms** that have been engaged in voluntarily agreeing to product safety pledges as well as key platforms operating in project countries will be engaged.
- **Data and Technology Platforms** –Innovative providers, such as Clearya, develops and facilitates AI-powered analytics to help regulators track potential mercury-added SLPs, monitor compliance, analyze trading patterns to support enforcement and consumer protection efforts while contributing data-driven insights to public campaigns promoting behavior change and safer alternatives
- **Academia and research community** participation, for example McGill University and Occidental College, will be crucial for data collection, and evidence-based insights, fostering innovation and building local capacity ensure the project’s effectiveness and long-term impact.
- **Local, immigrant, indigenous and marginalized communities**, along with their associations, whose meaningful participation is a key in shaping project activities and ensure the long-term impact of the interventions, will be engaged. Several organizations were already identified – more in-depth mapping and engagement will be undertaken during preparatory phase.
- **Youth, influencers including artists, social media influencers, public personalities**– partnering with who will amplify the project’s messages and communication while also contributing to countering toxic narratives and guiding youth and society towards positive, toxin-free choices. Several influencers and media persons were identified, including Patheon of women Who Inspire , as well as Kerish Rodgers - more in-depth mapping and engagement will be undertaken during preparatory phase.

5. Associated baseline

Globally

The global skin lightening products industry has an estimated market value of \$9.2 billion in 2023 and is expected to reach \$14 billion by 2032^[9]. Hundreds of millions of users globally use mercury added SLPs each year^[10] which is rooted in systemic colorism and cultural norms and pressures that promote certain beauty standards. Given the number of users and the decentralized nature of the activity, the use of SLPs requires attention on both supply and demand sides. Furthermore, according to the Global Mercury Assessment (2018)^[11], contact with mercury added SLPs

is also among one of the highest exposure risks. There is insufficient awareness on the health risks of mercury containing cosmetics and the main communication platforms (retail, television, billboards, and e-commerce) often promotes unrealistic beauty standards, exacerbating the situation. Many manufacturing countries are also Parties to the Minamata Convention, underlying a lack of compliance and government oversight with provisions that address manufacture, import and export. The formulation and re-formulation of products is widespread with small scale and cottage industries involvement and sales/advertising through online platforms. Strong regulatory frameworks related to liabilities are needed and should be strictly enforced for both physical and online sales. Despite the legal ban on mercury SLPs in many countries, these products remain readily available for purchase and relatively easy to both formally^[12] and informally manufacture.

A campaign on the elimination of mercury added skin lightening products was launched in 2017^[13], organized by European Environmental Bureau (EEB)/Zero Mercury Working Group (ZMWG). Over 1000 SLPs were purchased and analyzed from markets and online from around the world, and results are available from the ZMWG database^[14]. Six reports have been published including one on enforcement. Furthermore, several CSOs in Africa, have been supported to assist their governments to tackle this crisis.

Online sales of mercury added SLPs is particularly challenging to manage given the high availability and easy accessibility by consumers, and low accountability of platform administrators. Therefore, to ensure timely responses and learn from past experiences, a recent and illustrative example is worth mentioning which involved Amazon in the United States. Following a settlement with the California Attorney General resulting from a decade long lawsuit, Amazon recently decided to mandate additional measures to disallow sale offerings of mercury added SLPs.^[15] The lawsuit also resulted in Amazon enacting new requirements for SLP sellers to first test for mercury and other substances and provide those results prior to posting sale offerings.^[16]

In terms of global knowledge generation and dissemination, as well as fostering stakeholders' engagement and collaboration, the work undertaken by the UNEP Global Mercury Partnership has been fundamental in building momentum on addressing mercury added SLPs. The Secretariat of the Partnership in collaboration with the Mercury in Products Partnership area, have organized multiple outreach and awareness raising event on the issue since 2020^[17]. And since the inception of the MSP project on SLPs, the Partnership has established and is coordinating the project stakeholder group that gathers over 100 experts on the issue and meets every 6 months virtually to exchange and experiences between project countries and broader stakeholders^[18]. Multiple outreach events were undertaken to further raise global awareness, including for example special event: "Mercury in cosmetics – more than what meets the eye – conducted during the Minamata COP5. The partnership has been also instrumental in driving the discussion in the context of human rights and fight against racial discrimination. By partnering with the Minamata Convention Secretariat, it has launched UNEP wide social media campaign on Tackling Mercury Pollution and Racial Discrimination jointly^[19] and supported event on "Unmasking Mercury and Colorism in Cosmetics"^[20].

Moreover, the Partnership – and its area of work on Mercury in Products - has recently initiated a consultation with the global online platforms to assess policies and procedures in place for preventing the sale of hazardous products, such as mercury-added SLPs. This ongoing effort aims to contribute to the current MSP project as well as future initiatives. The area of work on Mercury Waste Management has been active in enhancing the collaboration and creating knowledge materials on various aspects related to environmentally sound management of waste containing mercury^[21]. The Partnership Advisory Group has also agreed to formally incorporate trade issue in one of its mainstream areas of work – further underlying the importance of multisectoral collaboration on that subject.

Country Specific

The scale of skin lightening product (SLP) use varies across target countries, with a strong demand observed among women and, to a lesser extent, men. For example, in Nigeria, an investigation by NGO - SRADeV Nigeria - found that over 70% of SLP users are young women, while 30% are men, with some parents even applying these products to children. In Sierra Leone, a study revealed that 22% of respondents actively bleach, while 44% have bleached in the past, with nearly half of male respondents also engaging in the practice. In Madagascar, skin lightening is widespread

among women, particularly on the face, with many products containing mercury. Mauritania also has high demand for SLPs, and weak border control allows these products to enter the market despite regulatory restrictions. The persistence of SLP use highlights the need for stronger enforcement, public education, and alternatives skin care routines that do not pose health risks. The findings of the study conducted by Gabon in the context of the MSP will provide additional insights to be included during the PPG phase.

The extent of regulation related to mercury added SLPs shows disparities among countries, with some having stringent frameworks while others lack specific regulatory provisions. There is disparity in the types of regulations in place, the responsible authority, the binding nature and provisions and application for manufacture, import and export. In most cases, different authorities are involved at different stages of the product lifecycle. South Africa has a robust regulation (Regulation No. R.1227) prohibiting mercury and other harmful substances in cosmetic products. Ethiopia has a comprehensive directive banning mercury in cosmetics and addressing licensing, labeling, import/export, and safety measures. Comoros regulates harmful chemicals, including mercury-added SLPs, but lacks licensing and labeling requirements. Burkina Faso is in the process of issuing an interministerial decree covering various aspects of mercury regulation. Sierra Leone lacks specific SLP regulations, with only a generic EPA Act in place. Togo intends to follow the Minamata Convention and is drafting legal texts to ban mercury-added products. Nigeria has developed a national policy on cosmetics, though it is not yet finalized. However, CSOs in country assisted in the development of a media investigate report^[22] to map out informal supply chain for skin lightening creams. Uganda has existing laws under the Bureau of Standards that apply for cosmetics that currently do not align well with the Minamata Convention regarding SLPs. Mauritania is in the process of drafting relevant regulations, while Côte d'Ivoire has recently adopted new Codes of Hygiene and Environment that include provisions on heavy metals, especially mercury where they prohibit its use for manufacture of domestic products. Madagascar, Niger, and Guinea lack specific regulations, though Guinea is planning to introduce measures.

In terms of testing capacity, five out of thirteen countries have conducted SLP screenings or tests. In South Africa and Uganda, national agencies carried out the analyses, while in Côte d'Ivoire, Guinea, and Nigeria, screenings were conducted in collaboration with NGOs. In South Africa, legally sold SLPs met the required safety limits, whereas those from the illicit market exceeded permissible levels. In Côte d'Ivoire, many SLPs were sold on online platforms such as Jumia and Facebook Marketplace. In Nigeria, nine out of thirteen tested creams contained high levels of mercury. Meanwhile, in Uganda, the National Bureau of Standards imposed restrictions on certain mercury added SLPs following testing.

Efforts to monitor, enforce regulations, and ensure accountability for the sale of mercury-added skin lightening products (SLPs) vary across countries. Burkina Faso and Togo have undertaken comprehensive training programs for customs officers, police, trade authorities, and laboratory technicians on mercury identification, detection, and notification procedures, with support from international initiatives like the Minamata Convention SIP. Nigeria has developed a National Action Plan aimed at phasing out mercury-added products and has engaged customs and trade authorities, although the plan does not specifically focus on SLPs. In South Africa, awareness campaigns were conducted for customs officials and border management authorities between 2022 and 2023 to strengthen enforcement. Côte d'Ivoire has facilitated consultations with customs, commerce officials, and the scientific police, where a dedicated unit monitors online fraud. In contrast, Guinea has yet to implement training or awareness initiatives for customs and trade authorities concerning mercury.

Studies on the health impacts of toxic skin-lightening products (SLPs) are largely lacking across the target countries, with most countries having limited or no research on mercury exposure and its effects on communities. Awareness and advocacy efforts regarding the risks of mercury added skin lightening products (SLPs) ranges across different countries, with many regions lacking structured initiatives. In Comoros, Guinea, Niger, and Madagascar, awareness efforts are minimal or limited to occasional workshops and media interventions. Ethiopia, Côte d'Ivoire, and Togo indicated deeply ingrained societal preferences for lighter skin, driven by historical, cultural, and media influences, though Togo has launched awareness campaigns supported by the government. Burkina Faso and Sierra Leone discourage SLP use for cultural and ethical reasons, with some NGOs involved in raising awareness. Uganda, Nigeria and Cote d'Ivoire have seen targeted campaigns in collaboration or led by NGOs and research groups, including

Biovision Africa, SRADeV Nigeria and Centre Africain pour la Santé Environnementale (CASE), while South Africa conducted awareness initiatives between 2019 and 2023. Despite these efforts, many countries lack comprehensive public education or health promotion programmes, and the role of social media and influencers in promoting SLPs remains limited. There is a growing need for inclusive advertising and stronger awareness campaigns to address harmful beauty standards and highlight the dangers of mercury exposure.

See Appendix 5 for further information on country specific baseline.

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- [22] <https://www.youtube.com/watch?v=rVUIGpVHLSo>

B. PROJECT DESCRIPTION

Project description

This section asks for a theory of change as part of a joined-up description of the project as a whole. The project description is expected to cover the key elements of good project design in an integrated way. It is also expected to meet the GEF's policy requirements on gender, stakeholders, private sector, and knowledge management and learning (see section D). This section should be a narrative that reads like a joined-up story and not independent elements that answer the guiding questions contained in the PIF guidance document. (Approximately 3-5 pages) see guidance here

THEORY OF CHANGE

The overall objective of the project is to reduce the manufacture, trade, sale and use of mercury added skin lightening products. Globally there is concrete evidence showing the adverse impacts of mercury and mercury compounds generated through the manufacture and use of SLPs. The project will tackle each of the identified barrier through four independent but interlinked components and their respective outcomes and outputs. More information is detailed in the Theory of Change (Figure 1) centered around phasing out mercury added SLPs in target countries and aligned with the countries' national context and their commitment as Parties to the Minamata Convention. The TOC has also been developed based on the problem and solution trees which can be found in Appendix 6.

The project will focus on the following 4 components:

1. **LEGAL AND REGULATORY FRAMEWORK:** Strengthen national legislative frameworks, enforcement and compliance capacities on banning the manufacturing, distribution, import and export of mercury SLPs
2. **SUPPLY CHAIN MANAGEMENT:** Identify manufacturing and trading patterns through improved product identification and testing capacities (both online and in store sales); improve understanding of SLP usage through behavioral studies; enhance waste management
3. **ENFORCEMENT and CONSUMER SAFETY:** Monitor, control and enforce the ban of mercury added SLPs across manufacturing, trade and sales both in stores and online
4. **AWARENESS RAISING:** Tackle demand and consumption of mercury added SLPs through national, regional, and global knowledge, awareness efforts, and skills building efforts as well as through campaign efforts aimed at supporting policy, regulation and enforcement efforts with strong gender considerations

The expected intermediate impact of the project is the reduction or phase out of mercury SLPs in project countries as per Article 4 and Annex A of the Minamata Convention. The direct beneficiaries of the project are the users of mercury SLPs and SLPs in general and other household members. With the political support driving the enactment and enforcement of legislation to regulate mercury SLPs alongside increased awareness by CSOs, cultural brokers, community leaders, youth, ethnic and other media, health professionals, the public, manufacturers, traders, and distributors of mercury SLPs, global demand for such products will decrease and ultimately leading to their phase out.

Commitment of key stakeholders including the governments of target countries, private sector, CSOs, academia are among the key assumptions to reach long term project objective.

During the preparatory phase, elaborated information on the Theory of Change will be provided.

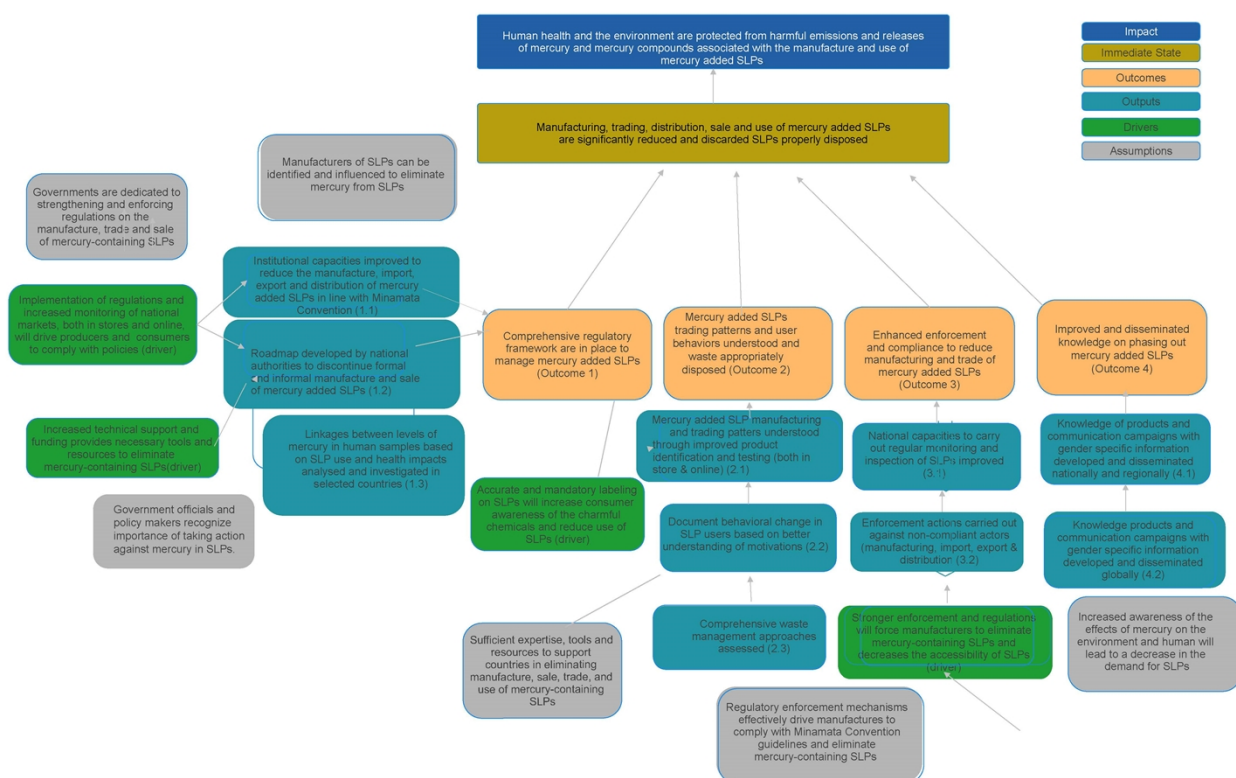


Figure 1. Theory of Change

ALTERNATIVE SCENARIO

This section provides a narrative overview of the independent but interlinked components and their respective outputs. Each output will include a preliminary list of activities, which will be further developed during the preparatory phase. The identification of barriers and project description stems from consultations with technical experts, private sector companies involved in the SLP industry and the Ministries of Environment and Health. Insights drawn from a similar initiative on the subject (MSP GEFID 10810) have also guided the project approach. Additionally, a Stakeholder Engagement Plan, a Gender Analysis and Action Plan and other relevant documents will be prepared during the PPG phase and will feed into the final project design.

The overall objective of the project is to reduce the manufacturing, trading, distribution, sale and use of mercury added SLPs, and to properly dispose of such products. This will be achieved through four components that address the root causes identified in the problem analysis.

Component 1: Strengthening legal and regulatory framework to manage mercury added SLPs

Outcome 1: Comprehensive regulatory frameworks are in place to manage mercury added SLPs

Target countries will have access to the regulatory depository and model regulatory toolkit (being developed under the MSP GEF ID 10810) to strengthen and/or develop their respective legal and regulatory frameworks to ban the manufacturing, import, export and distribution of mercury added SLPs. In addition, a clear labeling requirement will be mandated and penalties for non-compliance will deter repeat offenders. Furthermore, strong measures to manage informal/cottage industry on the manufacturing of mercury added SLPs will be introduced, incorporating these regulations into national licensing requirements. Moreover, this component will focus on creating a pathway for cross sectoral, inter-Ministerial and inter-regional collaboration related to requirement and mandates of mercury added SLPs in the African context. For example, ensuring continued engagements with institutions such as COMESA and ECOWAS,

both positioned to strongly foster national and regional policy coherence and harmonization. Finally, Component 1 will also conduct biomonitoring studies to understand the scale and pathways for exposure, raise awareness in affected and groups with vulnerabilities and use as evidence to educate and advocate for regulatory reforms.

Output 1.1: Institutional capacities improved to reduce the manufacture, import, export and distribution of mercury added SLPs in line with the Minamata Convention

- Provide technical support to target countries on developing/strengthening legal framework and introduce effective ways to engage and sensitize decision makers
- Convene local, national and regional stakeholders in each country involving public health and environmental regulators, policy makers and other professionals, manufacturers, traders/distributors, cultural brokers, community leaders, users, influencers, youth to establish a coordination mechanism, with gender considerations, to support the formulation and advocacy of the legal framework
- Assess institutional barriers related to public agency capacities, resource availability, and economic dependence of formal and informal manufacturing, trading and sale of mercury added SLPs and SLPs in general
- Promote national and regional policy coherence and harmonization to phase out mercury added SLPs

Output 1.2: Roadmap developed by national authorities to discontinue formal and informal manufacture and sale of mercury added SLPs

- Collaborate with the governments in countries where there is major manufacturing of mercury SLPs to develop a stakeholder process and roadmap, with gender considerations, for discontinuing production
- Collaborate with the governments, manufacturers and industry associations to design and implement labeling guidelines to ensure full disclosure of ingredients in SLPs
- Ensure licensing and registration procedures are clearly communicated to targeted groups
- Discourage/ban formal/cottage/informal manufacturing and sale of mercury added SLPs
- Assess and design options for alternative livelihoods, including natural mercury free cosmetics manufacturing

Output 1.3: Linkages between levels of mercury in human samples based on SLP use and health impacts analysed and investigated in selected countries

- Provide guidance for the conduct of human biomonitoring (e.g. blood and/or urine), including criteria for selection of subjects and guidance on ethics approval in close coordination with Ministries of Health and with gender considerations
- Compile and curate available biomonitoring data related to SLP use
- Strengthen the capacity of existing poison centers, including regional cooperation, to provide customized advice for members of the public and health professionals on health impacts of SLP
- Create tracking databases and analyze biomonitoring data over time and contribute toward policy decisions (potentially over the duration of the project)
- Conduct series of workshops with targeted stakeholders and gender considerations focusing on the health risks associated with SLPs and mercury exposure.

Component 2. Enhancing supply chain management and controls

Outcome 2: Mercury added SLPs trading patterns and user behaviors understood and waste appropriately disposed

The aim of Component 2 is to understand the entire supply chain of mercury SLPs and SLPs in general including formal and informal industries, starting with manufacturing sources, trade, distribution through practice patterns and the prevalence of mercury SLP usage among different demographics and communities, to mercury waste management practices in each country. Building on the results from the MSP, the project will continue to identify manufacturing and

trading patterns in and out of target countries through improved product identification and testing capacities, both online and in-store sales. This includes using methods to track the origin, label, and safety of the products and adding results to the global database (under development as part of the MSP).

In addition, strengthening the understanding of behaviors that effect demand and continued usage, which started in the MSP will continue in the FSP project. The behavioral approach will strengthen efforts already underway in some African countries and the tools will be made available globally when it has been tested and peer reviewed. Qualitative research will be conducted in communities such as focus group sessions and key informant interviews to continuously learn about the use of SLPs, motivators, day-to-day use of these products to document strong behavioral studies. Insights derived from these studies will be used to tackle the drivers of consumers behaviors. Moreover, waste management strategies and best practices will be developed and implemented to safely dispose these products to decrease the risk of environmental contamination.

Output 2.1: Mercury added SLP manufacturing and trading patterns understood through improved product identification and testing (both in store and online)

- Assess and map the current mercury SLPs supply chain in each country, including formal and informal channels
- Provide training for a standardized sampling protocol and carry out sampling and analysis exercises of suspected mercury added SLPs available in local markets (including confirmed results from global database)
- Assess national/regional analytical capacity (e.g. infrastructure and economic/cost implications) and provide training in identification and analysis
- Select 1-2 laboratories (based on existing capacity and interest) per country for a pilot demonstration to procure and deliver enhanced analytical equipment and provide training in its use; develop long term procurement and maintenance plans related to equipment
- Analyze national, regional and global trend on manufacturing and trading patterns with gender considerations

Output 2.2: Document behavioral change in SLP users based on better understanding of motivations

- Continue to develop country or context specific tools and map user journeys through the use of SLPs to prioritize action and decision making (knowledge, attitude and practices) with gender considerations
- Publish tools for use by global community with gender considerations
- Conduct quantitative and qualitative studies, including focus group sessions and key informant interviews to identify the needs, beliefs, use (frequency and user methods) and exposure patterns with gender considerations
- Analyze national, regional and global usage patterns, considering main drivers for usage, cultural differences and use the insights for targeted interventions aimed at producing a specific and measurable change (engage users and target audience in co-design and co-implementation) with gender considerations
- Conduct quantitative studies to measure self reported changes at population level or for target groups

Output 2.3: Comprehensive waste management approaches assessed

- Assess current capacities for mercury waste management in each country in the context of SLPs – with a focus on formal and informal manufacturing
- Assess SLP waste management options/case studies on a global scale, with an additional focus on economic and monetary dimensions
- Conduct training for national waste management stakeholders
- Develop and/or implement waste management approaches and/or strategies in each country

- Conduct nation-wide and community level outreach on how to safely dispose of mercury added SLPs from different entry points on the supply chain and based on existing infrastructure in each target country
- Conduct community health fair to educate and create collection site for mercury added SLPs based on existing infrastructure in each target country

Component 3. Strengthening enforcement and consumer safety controls

Outcome 3: Enhanced enforcement and compliance to reduce manufacturing and trade of mercury added SLPs

To effectively monitor, control and enforce the ban of mercury added SLPs through manufacturing, trade, distribution and sale, it is critical to introduce a comprehensive approach that includes surveillance, inspection and provisions for penalties for non-compliance.

Component 3 will focus on enhancing countries' ability to monitor and enforce regulations regarding mercury-added skin-lightening products (SLPs) to ensure full protection of consumer safety. The research on the supply chain and online sales under the MSP will serve as a foundation for continuing efforts to phase out mercury-added SLPs. The project plans to collaborate with customs and trade authorities to reduce the trade of mercury-containing SLPs in both physical stores and online markets. Additionally, the project will partner with major online platforms at national, regional, and global levels to consider engaging in voluntary product safety pledges and promote increased online accountability and liability.

Finally, the project will work with national enforcement authorities (including lawyers and judges) to ensure that the legal framework covering manufacturing, import, export, distribution of mercury added SLPs are fully implemented, and clear penalties are set for non-compliance cases.

Output 3.1: National capacities to carry out regular monitoring and inspection of SLPs improved

- Incentivize and provide appropriate training for custom and trade officials in each country
- Assess the cost implications of maintaining market, health and regulatory surveillance and long term sustainability of compliance related actions
- Ensure clear understanding of the roles and responsibilities of national entities on monitoring, control and enforcement
- Procure handheld XRF analyzers for each country and conduct training in maintenance and use for relevant stakeholders
- Monitor online and in store sale of mercury added SLPs in each country
- Promote online liability/accountability reforms
- Create detention list in each country
- Create health advisory/alert systems
- Require online platforms to monitor and remove mercury added SLPs on detention lists
- Mandate testing of SLPs by sellers known to have marketed mercury added SLPs

Output 3.2: Enforcement actions carried out against non-compliant actors (related to manufacturing, import, export, and sales)

- Introduce clear penalties for non-compliance in the manufacture, trade and distribute of SLPs that contain mercury
- Strengthen collaboration on regional and global harmonization related to monitoring, inspection border enforcement (with ECOWAS AND COMESA)
- Encourage processing of non-compliance cases and the enforcement of penalties in each country

Component 4. Knowledge management and awareness raising

Outcome 4: Improved and disseminated knowledge on phasing out mercury added SLPs

It is important to raise awareness among different stakeholders about the risks associated with the use of mercury added SLPs. The extent to which consumers are unaware of the dangers associated with using or misusing these products remains undocumented and will be assessed and be addressed. Even when users are aware of the risks, they might continue their behavior based on personal preference, societal or cultural pressure, beliefs, or the availability and acceptance of these products and practices. Thus, community engagement and educational efforts should address the root causes of demand and use, promote diverse beauty standards and community empowerment, while also communicating health risk associated with harmful chemicals.

Component 4 will ensure that knowledge and experience gained in the project is shared with the broader stakeholders through the UNEP Global Mercury Partnership (GMP) and other mechanisms at regional and global levels. This will facilitate south to south cooperation and peer to peer learning on how to phase out mercury added SLPs. Information will be disseminated through the UNEP GMP website, regional and country offices and international health, human rights and mercury and chemicals related forums. This component will also organize regional and global forums aiming at experience sharing to support other Parties of the Minamata Convention facing similar challenges in managing their mercury added SLPs. To ensure adequate processes to capture and distribute key information, a Knowledge Management expert will be engaged during project implementation.

Output 4.1: Knowledge products and communication campaigns with gender specific information developed and disseminated nationally and regionally

- Develop a communications and knowledge management plan entailing targeted outreach to stakeholders, incorporating gender and youth specific considerations
- Gather findings from gender analysis and action plan developed during the preparatory phase to inform knowledge strategies and products to be produced
- Compile insights and lessons learnt from previous efforts to inform current project including capturing best practices and expertise related to gender responsive generated during implementation
- Develop processes for capturing, assessing and documenting information, lessons learnt and best practices throughout the project lifecycle with an additional focus on gender specific aspects
- Develop multi-media public health campaigns and community-based interventions to raise awareness and combat colorism (e.g. video, radio, blogs and other social media channels)
- Conduct specific outreach to small business owners (e.g. salons and other business that sale or use SLPs)
- Engage with influencers nationally and regionally to increase impact of the project
- Organize regional experience exchange meetings in Africa

Output 4.2: Knowledge products and communication campaigns with gender specific information developed and disseminated globally

- Analyze, curate and share lessons learnt to ensure that gender, youth and marginalized communities' specific insights and gender responsive practices are highlighted
- Continue to maintain and curate project webpage (hosted by the UNEP GMP with links to other resources and websites), and global stakeholder group to facilitate sharing of information and knowledge management
- Engage with influencers globally to increase impact of the project and combat colorism
- Host and maintain the global SLP database which will continue to expand past project end date
- Organize global communication campaigns, as well as series of global awareness raising and dissemination workshops for project and non-project countries, targeting different stakeholders (e.g. public health professionals, community health workers, community leaders, cultural brokers, youth leaders) incorporating gender, youth and marginalized communities' specific sessions and maintain regular knowledge exchange and south to south cooperation mechanisms with other related projects

- Disseminate the findings at international events (e.g. COPs, international conference on mercury as a global pollutant)
- Organize global experience exchange meetings (coordination with proposed MSP SLPs in LAC and Asia regions)

Close coordination will be ensured with existing initiatives and partners of the GMP areas on the Mercury Added Products, Mercury Waste Management and Mercury Supply and Storage. Further consultations will be conducted during the PPG phase.

INNOVATIVE AND SCALING TOWARDS TRANSFORMATION

The project will build on the experiences and lesson learned through the MSP SLP project (ID 10810, 2022-2025) and replicate best practices globally in both manufacturing and non-manufacturing countries to phase out mercury added skin lightening products from physical and online sales. International insights, best practices and proven strategies will be gathered and adapted to the target countries' context during the PPG phase, including the involvement of youth leaders, celebrities, local cultural brokers and influencers.

The project will continue to provide an enabling environment for the introduction of appropriate institutional frameworks and enforcement to phase out skin lightening products in line with the Minamata Convention and strengthen laboratory capacities in testing and monitoring the skin lightening products to better control and regulate the manufacturing, trading, and distribution of such products. Clear linkages and/or mechanisms among regulatory, trade and testing authorities in country will be established. In addition, procurement of detection equipment and associated trainings can directly contribute and synergize with the regional mercury monitoring hubs/laboratories that are already being setup through the SIP projects.

Furthermore, the interventions toward monitoring and control of SLP in store retails, as well as online sales will be targeted toward both website/platform providers, consumers/users and social media platforms. Strong private sector engagement is envisioned, and the level and extent of their involvement will be confirmed during the PPG phase as only preliminary contacts have been made. AI-powered analytics and data-driven monitoring tools may enhance enforcement efforts by tracking online and in-store sales, identifying non-compliant products, and supporting regulatory actions against violators. In terms of monitoring, the project will also design a plan and conduct biomonitoring in several communities across project countries to minimize exposure, especially targeting groups with vulnerabilities and marginalized communities.

UNEP plans to submit a 2 Step MSP in the second half of 2025 to cover several countries in LAC and Asia that have expressed interests in working on the phase out mercury added SLPs. The plan is to align the FSP and MSP so the two projects will start implementation around the same time to ensure global coverage of the issue, share information and knowledge materials for greater impact.

Finally, the project will place significant emphasis on exploring the social and cultural dimensions of skin lightening as a practice. Global communication and knowledge management will be integrated into project interventions in collaboration with not only national Ministries and Agencies, but also civil society, local communities, academics, health professional and the private sector (i.e. cosmetics industries, manufacturers, online sale platforms), linking to broader outreach and fight against racial discrimination. Data-driven transparency tools could help stakeholders assess trends in product availability, consumer behavior, and regulatory gaps, reinforcing broader outreach efforts and the fight against racial discrimination. The project will continue to multiply benefits through Global Mercury Partnership network and coordination of the Project Stakeholder Group (established under the MSP project) to ensure the continuation of engagement, knowledge and information sharing with field practitioners and other related/interested stakeholders. The strong integration of the priorities from three sectors, environment, health and human rights agenda will ensure that cohesion and multiply the efforts cross the components.

IMPLEMENTATION ARRANGEMENTS

UNEP will serve as the Implementing Agency (IA) for the project, while the Executing Agency (EA) will be the Biodiversity Research Institute, BRI, a U.S based non-profit organization dedicated to assessing emerging threats to wildlife and ecosystems through collaborative research and use scientific findings to advance environmental awareness and inform decision makers. World Health Organization, UNEP's Global Mercury Partnership (European Environment Bureau and Zero Mercury Working Group as co-leads of the Mercury Added Products Area), will provide various types of execution support for specific outputs and activities under different types of contractual modalities. Detailed execution arrangements will be finalized during the preparatory phase.

A regional Project Steering Committee (rPSC), to be rotationally co-chaired by the Ministry of Environment and Ministry of Health of target countries, will act as the mechanism that will guide the direction of the project, review and approve annual workplans and budget and collectively identify solutions to project problems. There will also be national Project Steering Committees (nPSCs) in all target countries, acting at the national mechanism, involving relevant institutions and stakeholders such as private sector, health professionals, policy makers, SLP supply chain actors, online and in store retailers, awareness raising ambassadors such as youth leaders, celebrities and influencers in country context. The rPSC will be linked with other PSC to be formed under the MSP project covering LAC and Asia regions to enhance synergies. Implementation and coordination arrangements will be further developed during the PPG phase. Strong inter-institutional coordination and communication will ensure consistent messaging and alignment of actions toward addressing mercury added SLPs.

The rPSC and nPSCs will aim for gender balance and inclusivity. This approach will help promote diverse perspectives and ensure that gender considerations are integrated into decision-making processes. Gender and human rights will be integrated into deliberations beyond mere participation and representation data by embedding gender-responsive criteria into project policies and procedures.

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project?

Yes

If so, please describe that role here. Also, please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for co-location and/or sharing of expertise/staffing

The Global Mercury Partnership, which is providing execution support to BRI and WHO on the active MSP (GEF ID 10810) will continue its role in the proposed project, especially related to engaging national, regional and global stakeholders, waste management, knowledge management and awareness raising.

The MSP project on “Eliminating Mercury Skin Lightening Products” (GEF ID 10810, 2022-2025) aims to eliminate mercury containing skin lightening products in three pilot countries Gabon, Jamaica, and Sri Lanka who will spearhead the work at the national level. The main lessons learnt to-date from the project include:

- **Improving baselines:** Sampling of over 350 skin-lightening products in three pilot countries found that 5% contained mercury, with levels ranging from 129 ppm to over 30,000 ppm. Through sampling, the main manufacturing countries identified were Pakistan, India, France, Egypt, Sri Lanka, and Jamaica. These findings help establish a stronger and more precise baseline for follow up action.
- **Tracking the latest trends:** The evolving nature of SLP distribution highlights the need for continuous data collection to stay ahead of informal trade and distribution patterns. By monitoring supply chain trends, the project will ensure timely adjustments to policies and enforcement strategies, improving overall impact.
- **Engaging national stakeholders:** Co-creation and collaboration across environment and health actors is a key for the success and sustainability of actions to eliminate mercury SLPs. Moreover, engagement with national laboratories, standards bureau, trade and enforcement authorities are critical for comprehensive control of mercury SLPs.

- **Engaging global stakeholders:** The project stakeholder group formed under the MSP project has proven to be a valuable forum for exchanging knowledge and experiences between project countries and a wider network of stakeholders, which contributed significantly to the growing momentum to address mercury added SLPs globally. To enhance the forum's impact, there is a need to offer it in French and accommodate different time zones, ensuring broader accessibility and participation.
- **Recognizing challenges and engaging stakeholders involved in the informal side of the sector:** While formal manufacturing of skin-lightening products was identified in only one pilot country, all three reported the presence of informal or cottage industries. This highlights the sector's complexity and the need for targeted strategies in future initiatives to address unregulated production.
- **Promoting high level initiatives which drive change:** Gabon has proven that high level initiatives, in form of Libreville commitment on the elimination of mercury-containing skin-lightening cosmetics in Africa - contributes to strengthening the collaboration and can foster willingness for stronger regulations, enhanced enforcement measures and public awareness campaigns to combat these harmful products on a regional scale. Ministers in Gabon adopted the Libreville Commitment, urging its submission to African Council of Ministers in Charge of the Environment and the Minamata Convention Secretariat for presentation at COP-6. The goal is to drive discussions to address the challenges related to manufacture and trade of SLPs, prohibit use of mercury compounds in SLPs and accelerate the elimination of mercury-added cosmetics.
- **Enhancing knowledge management:** The established knowledge hub under the UNEP Global Mercury Partnership has proven to be a valuable resource, curating relevant information and linking to other platforms, serving as a one-stop destination for stakeholders to track project progress. To increase accessibility and reach a wider audience, there is a pressing need to make the information available on the platform in multiple UN languages.
- **Amplifying global voices:** The project has piloted partnerships with influencers and artists to raise awareness about the issue, particularly through collaboration with co-financing partners and the Secretariat of the Minamata Convention. To further amplify the message, there is a need to engage more influencers, ambassadors, private sector and celebrities through global and regional communication campaigns.

The **FSP on Phase Out Mercury Measuring Devices in Healthcare** (GEF ID 10716, 2023-2028) is an active project focusing on phasing out thermometers and sphygmomanometers in Albania, Burkina Faso, India, Montenegro and Uganda. The project also has a waste management component which aligns with the proposed project. Synergies and knowledge sharing will be coordinated, especially in overlapping countries.

Other related initiatives include:

Specific International Programme (SIP) – through its SIP project, Gabon, intends to establish the Central Africa Region Mercury Monitoring and Evaluation Network in collaboration with four other Minamata Convention Parties (São Tomé and Príncipe, Equatorial Guinea, Republic of Congo, and Cameroon). Meanwhile, Burkina Faso, Senegal and Togo are spearheading a project to strengthen legal and institutional capacity for implementing Article 3 (mercury supply and trade) and Article 4 (mercury-added products) of the Minamata Convention. These initiatives enhance regional technical capacity and lay the groundwork for scaling efforts across other countries in the future.

The Global Chemicals Monitoring Programme (GCMP) (GEF ID 11534) is designed to contribute to the effectiveness evaluation of the Stockholm Convention on Persistent Organic Pollutants and to provide data to support the effectiveness evaluation mechanism of the Minamata Convention on mercury. The GCMP as a global programme consists of a global coordination project and five regional child projects covering 54 countries in the Africa, Asia, Pacific Islands, Latin America and the Caribbean regions. The programme will carry out global background monitoring of POPs and mercury in various regions simultaneously and facilitate regional capacity building to generate high-quality, globally comparable data that supports policy and decision-making. The proposed project will leverage expertise, experience and coordinate with the GCMP on the planned human biomonitoring activities.

UNEP's Japan-Funded Initiative on Mercury Management- UNEP is implementing a Japan-funded project to promote the Minamata Convention on Mercury by leveraging Japan's expertise. Supporting 12 countries—Mongolia, Palau, the Philippines, Indonesia, Malaysia, Vietnam, Thailand, Sri Lanka, the Maldives, Myanmar, and Nepal—the initiative focuses on capacity building for mercury monitoring, strengthening regulatory frameworks, and combating illegal mercury trade through information exchange, awareness, education, and research. Insights and collaboration on customs training and the trade of mercury-containing products will be crucial for future activities on strengthening border controls and removing skin-lightening products from the market.

The International Cooperation on Cosmetics Regulation (ICCR) - is a voluntary international group of cosmetics regulatory authorities from Brazil, Canada, Chinese Taipei, the European Union, Israel, Japan, Republic of Korea, and the United States who meet on an annual basis to discuss cosmetics safety and regulation, as well as enter into a constructive dialogue with relevant cosmetics industry trade associations.

Operation Pangea involves a number of countries dedicating a week each year under an international initiative with INTERPOL called Operation Pangea to tackle the illicit online sale of health products. Operation Pangea IX was coordinated by INTERPOL with support from the World Customs Organization (WCO), the Permanent Forum of International Pharmaceutical Crime (PFIPC), the Heads of Medicines Agencies Working Group of Enforcement Officers (WGEO), Europol, the Pharmaceutical Security Institute (PSI) the Center for Safe Internet Pharmacies (CSIP) and private sector companies including Discover, G2, LegitScript, MasterCard, PayPal and VISA.

Global Mercury Partnership - The proposed project will benefit from being nested within the globally recognized network of experts from the Global Mercury Partnership. Initiated in 2005, the UNEP led network aims to protect human health and the environment from the releases of mercury to air, water and land. With over 260 partners from governments, IGOs, NGOs, industry and academia, the Partnership focuses on supporting timely and effective implementation of the Minamata Convention on Mercury, providing state of the art knowledge and science, and raising awareness towards global action on mercury. In addition to the Secretariat of the Global Mercury Partnership's leading role in global knowledge management and communication, experts from the Mercury in Products Partnership Area—co-led by the US EPA, European Environmental Bureau, and Zero Mercury Working Group—will be engaged to enhance and expand the project's benefits. Therefore, the Partnership plans to provide execution support to the lead EA (BRI) in this project.

World Health Organization - WHO has country offices in all African countries which already established communication channels with governments for convening intersectoral meetings and workshops. WHO has a regional office based in Brazzaville with established capacity for supporting implementing GEF projects in African countries. A regional committee made up of Ministers of Health from 47 African countries meets annually to decide health policy. An initiative to strengthen and implement a behavioral insights approach in Africa is already underway to build capacity. WHO Headquarters has important capacity for supporting the work on mercury added SLPs through a number of integrated initiatives involving risk assessment, biomonitoring, poison center development and strengthening, pharmacovigilance, children's environmental health, food safety (mercury exposure through seafood), burden of disease, counterfeit medicines, health law policy, waste management at health facilities and medical products. WHO hosts a number of networks that can be used to disseminate the project findings and contribute to implementation. These include the WHO Network of Poison Centers (300 around the world) ; the WHO Collaborating Centre Network (more than 200 institutions) and the WHO Chemical Risk Assessment Network which includes over 100 institutions in 59 Member States. WHO has published substantial guidelines on strengthening poisons centers and the conduct of biomonitoring studies. WHO has official relations with a number of Non-State Actors including the International League of Dermatology Associations.

Minamata Convention Secretariat - Pursuant to COP Decision MC-5/5, the Secretariat of the Minamata Convention is preparing a report to COP-6 on challenges in preventing manufacture, import and export of mercury-added cosmetics. COP6 is expected to consider further measures including activities by the Secretariat to support the implementation of the Convention.

As the implementing agency of the MSP project on Eliminating Mercury Skin-Lightening Products and host of the Global Mercury Partnership Secretariat, UNEP has demonstrated strong managerial and technical capacity in tackling this issue. In collaboration with the Minamata Convention on Mercury, UNEP has proven to be a leading voice in advancing global discussion on addressing mercury pollution and racial discrimination jointly ^[1] advocating for an inclusive, fair, and toxic-free future for all.

Furthermore, through the Libreville Commitment^[2], UNEP and the Global Mercury Partnership, WHO and BRI have been called upon to support developing countries in eliminating mercury-added products, strengthening regulations, and raising awareness of health risks. Emphasis was placed on leveraging the Global Mercury Partnership to engage more stakeholders and promote equitable beauty standards. Additionally, sharing evidence from key countries at global forums and assisting in phasing out the production of mercury-containing cosmetics were identified as essential actions. Promoting voluntary product safety commitments on online platforms, following global best practices, was also highlighted as a key strategy for eliminating these harmful products.

There are other national, regional and international initiatives, institutions and organizations that work on the phase out of mercury added SLPs and these will be further explored and investigated for synergies and collaboration during the PPG phase.

^[1] <https://www.unep.org/globalmercurypartnership/news/editorial/tackling-mercury-pollution-and-racial-discrimination-jointly>

^[2] <https://minamataconvention.org/en/news/libreville-commitment-elimination-mercury-containing-skin-lightening-cosmetics-africa>

Core Indicators

Indicator 9 Chemicals of global concern and their waste reduced

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
14.00	0.00	0.00	0.00

Indicator 9.1 Solid and liquid Persistent Organic Pollutants (POPs) removed or disposed (POPs type)

POPs type	Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
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Indicator 9.2 Quantity of mercury reduced (metric tons)

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
14.00			

Indicator 9.3 Hydrochlorofluorocarbons (HCFC) Reduced/Phased out (metric tons)

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 9.4 Number of countries with legislation and policy implemented to control chemicals and waste (Use this sub-indicator in addition to one of the sub-indicators 9.1, 9.2 and 9.3 if applicable)

Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)

Indicator 9.5 Number of low-chemical/non-chemical systems implemented, particularly in food production, manufacturing and cities (Use this sub-indicator in addition to one of the sub-indicators 9.1, 9.2 and 9.3 if applicable)

Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)

Indicator 9.6 POPs/Mercury containing materials and products directly avoided

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 9.7 Highly Hazardous Pesticides eliminated

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 9.8 Avoided residual plastic waste

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 11 People benefiting from GEF-financed investments

	Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)
Female	6,300,000			
Male	1,500,000			
Total	7,800,000	0	0	0

Explain the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators (max. 250 words, approximately 1/2 page)

GEF Core Indicator 9:

Indicator 9.2: It is anticipated that approximately 14 tons of mercury will be removed from circulation through project interventions. Based on previously tested samples, mercury is used in approximately 5% of skin lightening products sold online and in stores in Africa. They are expected to be removed from the market and safely disposed at the end of the project. It is estimated that there is on average 3 grams of mercury per jar of skin lightening product and 12 jars are used per year per person, yielding 0.036 kg of mercury per person per year (same estimates as the MSP project).

$0.036 \text{ kg of Hg} * 7.8 \text{ million (users)} * 0.05 \text{ (on average 5\% of the products sold online and in stores contain mercury)} / 1000 = 14 \text{ tons}$

Assumption: impact calculated for one year (last year of the project).

The usage rate is very specific per country for men and women; therefore, the figures will be confirmed during the PPG phase.

GEF Core Indicator 11: The number of direct beneficiaries were calculated based on the population between the ages of 15 and 65 from the target countries with the highest possibility of using skin lightening products, corresponds to potentially over 7.8 million individuals (6.3 million women and 1.5 million men) in target countries. Subsequently, the direct number of beneficiaries that will benefit through reduced exposure to mercury and improved health will be refined and validated with updated statistical data.

Key Risks

	Rating	Explanation of risk and mitigation measures
CONTEXT		
Climate	Low	<p>Exposure to extreme weather conditions affect project activities</p> <p>Likelihood: low; Impact: moderate</p> <p>Climate-related damage to infrastructure, such as roads or bridges, can slow down some of the activities that might require travel, e.g. outreach and consultations with the stakeholders in various regions of the country.</p> <p>The project team will assess climate-related risks and activate protocols, if necessary, to mitigate the effects of adverse climatic conditions.</p>
Environmental and Social	Moderate	<p>Handling, storage and treatment of seized products and mercury containing waste as part of ESM leads to environmental risks Likelihood: low; Impact: high Seized mercury containing SLPs and resulting mercury containing waste, along with possible release of the mercury during collection, transport, storage, and stabilization, may pose environmental impacts and health hazards to workers and nearby communities, with heightened risks for groups with vulnerabilities. This may lead to community resistance to storage or disposal sites. Mitigation measures include strict compliance with international standards and robust emergency response plans to prevent and address spills or releases during seizure and handling. Additionally, worker training and regular monitoring will ensure safe handling and build public trust in the project.</p> <p>Supply chain actors' concerns affect the SLP phase-out Likelihood: moderate; Impact: high Supply chain actors, including formal and informal stakeholders, may be resistant to the phase-out of SLPs, particularly local manufacturers and sellers who might be concerned about potential income loss. For some businesses, SLP sales represent their primary source of revenue, making the transition more challenging. Project will mitigate this by engaging and fostering open dialogue to address concerns, raise awareness and actively involve local businesses in developing sustainable solutions, and share success</p>

		<p>stories from similar transitions to alternative livelihoods and practices. Additionally, by investigating in depth the underlying drivers of the informal activity the project will ensure that the interventions are tailored to address unregulated activities. Aspart of the stakeholder engagement plan that will be developed during the PPG phase, specific approaches and methods will be designed to engage various supply chain actors, including vulnerable and disadvantaged populations. Underlying historical, cultural and toxic beauty standards affect the effectiveness of the interventions Likelihood: moderate; Impact: high The root causes that drive demand for the SLP is often nested in historical and cultural stereotypes and idealization of whiteness as a beauty standard. The issue is further exacerbated by media, advertising, and societal pressures, including those from family and community members. To mitigate these risks, a comprehensive assessment of the cultural and historical factors driving SLP use and well as behavioral studies will be initiated during PPG with the intention to finalize during project implementation. Effective measures may include targeted outreach, public health interventions, and awareness campaigns aimed at addressing these underlying causes. The efforts should specifically engage men (both as drivers and users), women, and healthcare practitioners and other key stakeholder to foster a more informed and inclusive approach.</p>
Political and Governance	Moderate	<p>Institutional and political changes of priorities and personnel slow down project activities/result in additional efforts Likelihood: moderate; Impact: high Shifts in leadership or political priorities at key national institutions may weaken support structures for the project, leading to delays in decision-making and reduced resource allocation and enforcement action. Changes in institutional priorities, including reduced willingness to work with the key actors along the supply chain may further jeopardize the long-term feasibility and operational sustainability of enforcement of bans and the waste management strategies. Moreover, the difference in perspective or a lack of clear coordination between government agencies (e.g. Ministries of Environment and Ministries of Health) with overlapping competencies could further hinder implementation. Mitigation measures for these risks include formalizing inter-agency coordination mechanisms, securing institutional commitments through legally binding agreements, and establishing contingency plans to ensure operational continuity. Additionally, international pressure and close monitoring of the Implementing Agency (IA) may be necessary to maintain political commitment and ensure the project's goals are achieved. Challenges with regulating the informal market and cottage industry hinder the phase out of SLPs Likelihood: moderate; Impact: high Effectively regulating the informal market and cottage industry involved in the production and sale of mercury-containing SLPs remains a challenge. The continued presence of unregulated manufacturing and sales could hinder project progress and compliance efforts. The mitigation measures include collaboration with regulatory authorities to enhance monitoring, enforcement, and penalties for the illegal production and sale of mercury-containing SLPs. And where possible, to provide incentives and support for small-scale manufacturers to</p>

		transition to legal, mercury-free cosmetic alternatives that promote natural beauty.
INNOVATION		
Institutional and Policy	Moderate	Innovative regulatory and enforcement approaches are affected by institutional weakness and changes Likelihood: moderate; Impact: high The introduction of new regulations, processes, followed by monitoring and enforcement are essential for implementing the phase out of mercury SLPs from both physical and online markets. However, the innovative nature of these approaches introduces uncertainty regarding their adoption, effective implementation, and alignment with broader institutional goals. Resistance to new norms, cooperation frameworks, and practices, or insufficient capacity among stakeholders, could further delay progress. To address these risks, the project will prioritize early stakeholder engagement and conduct targeted training sessions and workshops for regulators, businesses, and enforcement agencies to ensure they understand and can effectively implement new regulations and processes. Moreover, the regulations and enforcement strategies might be introduced in stages, to adapt and refine approaches based on the gathered feedback and effectiveness of the applied measures. Transparency regarding the benefits of innovation and fostering a sense of ownership among all parties from the outset will be crucial to securing the adoption of innovative policies and ensuring long-term sustainability.
Technological	Moderate	Limitations in terms of laboratory capacity and product testing weaken the interventions Likelihood: moderate; Impact: high Accurate data collection and reliable product testing are essential for assessing the presence of mercury in SLPs and enforcing regulations. Nevertheless, many mercury-containing SLPs are sold through informal vendors, small-scale cottage industries, and online platforms, making it difficult to obtain representative product samples for testing. Moreover, some countries may lack accredited laboratories or sufficient technical capacity to conduct standardized, reliable testing of mercury levels in SLPs, leading to delays or inconsistent results. To address these risks, the project will build on the lessons learned and experience from the MSP project on eliminating mercury SLPs and ensure coordination ad possible coordination with other regional initiatives. The in-depth training as well as provision of testing instruments will be ensured to build national capacity contributing to the long-term sustainability of the interventions. Challenges with conducting representative human biomonitoring weaken the interventions Likelihood: moderate; Impact: moderate Human biomonitoring (HBM) is essential for assessing mercury exposure in SLP users, providing scientific evidence to guide policy decisions and evaluate intervention effectiveness. However, the scale and scope of the interventions might be affected by technical capacity, and limited access to representative populations and distrust. Th project will ensure that the HBM protocols and approaches follow the international ethics standards and standard operating procedures. Furthermore, to ensure the representative sampling, the selection of targeted population will be based on the in-depth socio-behavioral insights undertaken

		by the project with specific focus on vulnerable and disadvantaged communities. In addition, WHO will be actively engaged in the process with national Ministries of Health.
Financial and Business Model	Moderate	Challenges in developing business models and financial sustainability plans related to laboratory capacities, surveillance and waste management Likelihood: moderate; Impact: moderate One major challenge related to developing comprehensive business models is securing consistent funding for infrastructure and technology upgrades, as these areas often require significant investment in specialized equipment and skilled personnel. Moreover, maintaining laboratory capacity and surveillance systems demands a constant flow of resources for operation and upkeep, which can be hindered by fluctuating budgets or competing priorities. Waste management, especially in sectors like healthcare and research, also requires long-term planning due to the complexity of handling hazardous materials and the cost of implementing safe disposal practices. To address these risks, the project will build on the lessons learned and experience from the MSP project especially on building laboratory capacity and ensure coordination with other national and regional initiatives. The in-depth training as well as provision of testing instruments will be ensured to build national capacity contributing to the long-term sustainability of the interventions. Furthermore, the project will involve cross-sector collaboration between government, private entities, and non-profits, which can strengthen coordination and resource allocation. Developing financially sustainable models requires balancing the initial high costs with ongoing operational expenses, while ensuring that all stakeholders are aligned on goals and expectations.

EXECUTION

Capacity	Low	The Executing Agency and other partners lack capacity to execute project activities. Likelihood: Low; Impact: Moderate The Executing Agency Biodiversity Research Institute (BRI) brings significant experience in implementing projects, including being co-executing agencies for the current MSP on eliminating mercury SLPs. It has a track record of collaboration with UN bodies and bilateral donors. While these strengths position the agency well for success, the project's extensive geographical scope presents logistical and coordination challenges. Ensuring consistent technical expertise and capacity across countries in the region remains critical. Tailored capacity-building programs, clear coordination mechanisms, and external technical support provided by key partners from Global Mercury Partnership, WHO and others, will ensure effective implementation. Establishing close communication and coordination instruments between the Executing Agency, and Ministries of Environment and Ministries of Health in the targeted countries is critical; without these, implementation will face continual delays.
Fiduciary	Low	Funds are mismanaged and/or not used efficiently. Likelihood: Low; Impact: Moderate UNEP will ensure compliance with GEF and UNEP guidelines at all times during the project cycle. Work plans, budget estimates and procurement plans will be prepared and approved annually. In addition, close coordination

		and communication with the executing agency and national counterparts is expected on a regular basis through both regional and national project steering committees and other meetings and exchanges. In addition, BRI will be subject to annual auditing of all the expenditures on the project.
Stakeholder	Low	Relevant stakeholders are not engaged and/or committed towards the project. Likelihood: Low; Impact: Moderate Lack of stakeholder engagement can cause misalignment, poor communication, and resource constraints, leading to delays and budget overruns. Active involvement, clear communication, and engagement strategies are essential to mitigate this risk. Measures include developing and curating a comprehensive stakeholder engagement plan during PPG to identify key national stakeholders and implement effective engagement strategies tailored to different groups. Moreover, the established under current MSP project stakeholder group will continue acting as a platform to exchange knowledge and experience between the project countries and broader global stakeholders, ensuring engagement and commitment at the global scale.
Other	Low	Existing gender bias in target countries hinders the effectiveness of the interventions Likelihood: Low; Impact: Moderate Since both women and men use SLPs, and women are particularly vulnerable to mercury exposure with related health risks, gender-blind interventions would hinder progress and exclude the most affected segments of the population. To mitigate this risk, a strong gender focused communication plan will be developed during the PPG by an expert to ensure that the gender responsive considerations and indicators are integrated into project activities and outputs, as well as mainstreamed across all execution activities.
Overall Risk Rating	Moderate	Combining all the identified risk, this assessment concludes that the overall project risk rating is moderate. However, close monitoring of risks (already identified and possible future risks) will guarantee adequate risk management and adaptation.

C. ALIGNMENT WITH GEF-8 PROGRAMMING STRATEGIES AND COUNTRY/REGIONAL PRIORITIES

Describe how the proposed interventions are aligned with GEF- 8 programming strategies and country and regional priorities, including how these country strategies and plans relate to the multilateral environmental agreements.

Confirm if any country policies that might contradict with intended outcomes of the project have been identified, and how the project will address this.

For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e., BD, CC or LD), please identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and explain how. (max. 500 words, approximately 1 page)

The project is fully aligned with the GEF-8 Chemicals and Waste Focal Area Programming Strategy, which directly supports the implementation of the Minamata Convention. It contributes to the achievement of GEF-8 Objective 1: the creation, strengthening, and support of an enabling environment and policy coherence to transform the manufacture, use, and sound management of chemicals while eliminating waste and chemical pollution; Objective 2:

the prevention of future accumulation of hazardous chemicals and waste in the environment; and Objective 3: the elimination of hazardous chemicals and waste.

The project supports UNEP's Medium-Term Strategy (MTS) 2022-2025, namely to Outcome 3A: Human Health and Environmental Outcomes are optimized through enhanced capacity and leadership in the sound management of chemicals and waste; and Outcome 3C: Releases of pollutants to air. Water, soil and the ocean are reduced. Concretely, the project will directly contribute to the following outputs:

- 3.1 Regional and national integrated policy has shifted towards the sound management of chemicals and waste
- 3.5 Institutional capacity to adapt and act on national and international commitments is enhanced
- 3.9 Use of harmful chemicals in products and processes is reduced in key sectors

It is also linked to the "Pollution and Health" Programme Coordination Project (PCP).

Furthermore, the planned activities aimed at curbing both legal and illegal trade in mercury compounds, skin-lightening products (SLPs), and associated wastes are in alignment with the priorities of other Multilateral Environmental Agreements, such as the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. These activities also support the efforts of other international organizations, including the World Trade Organization and INTERPOL, UNODC^[1] as well as UNEP-led initiatives such as the Green Customs Initiative^[2].

Additionally, the project activities aimed at promoting equity across all skin tones and addressing the social and cultural dimensions of skin-lightening practices—particularly those outside of medical necessity—may further contribute to the advancement of the objectives of the UN Convention on the Elimination of All Forms of Racial Discrimination^[3].

At the regional level, the project is fully aligned with the recently launched Libreville Commitment on the Elimination of Mercury-Added Skin-Lightening Cosmetics in Africa—an initiative spearheaded by the Government of Gabon with support from other countries in the region. Moreover, the project has the potential to contribute to the African Union's Agenda 2063 by delivering impactful actions that advance its key aspirations, including Aspiration 1: 'A prosperous Africa based on inclusive growth and sustainable development,' and Aspiration 5: 'An Africa with a strong cultural identity, common heritage, shared values, and ethics.'

The project intends as well to leverage and amplify the efforts taken by the African countries related to consumer protection and access to information, e.g. efforts led by Nigeria National Agency for Food and Drug Administration and Control^[4], Kenya Consumer Protection Department^[5] and Rwanda Food and Drugs Authority^[6], and global initiatives led by UN Trade and Development Organization^[7].

^[1] [CCP Programme details](#)

^[2] <https://www.unep.org/explore-topics/environmental-governance/what-we-do/strengthening-institutions/green-customs>

^[3] <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-elimination-all-forms-racial>

^[4] <https://nafdac.gov.ng/consumer-safety/>

^[5] <https://www.cak.go.ke/what-we-do/consumer-protection/overview>

^[6] <https://rwandafda.gov.rw/wp-content/uploads/2022/12/GUIDELINES-ON-CONTROL-OF-IMPORTATION-AND-EXPORTATION-OF-COSMETIC-RODUCTS.pdf>

^[7] <https://unctad.org/topic/competition-and-consumer-protection/consumer-protection-map>

D. POLICY REQUIREMENTS

Gender Equality and Women's Empowerment:

We confirm that gender dimensions relevant to the project have been addressed as per GEF Policy and are clearly articulated in the Project Description (Section B).

Yes

Stakeholder Engagement

We confirm that key stakeholders were consulted during PIF development as required per GEF policy, their relevant roles to project outcomes and plan to develop a Stakeholder Engagement Plan before CEO endorsement has been clearly articulated in the Project Description (Section B).

Yes

Were the following stakeholders consulted during project identification phase:

Indigenous Peoples and Local Communities: Yes

Civil Society Organizations: Yes

Private Sector: Yes

Provide a brief summary and list of names and dates of consultations

Gender mainstreaming activities will be integrated throughout the project. In regards to resources, under Component 4 Awareness raising, at least \$250,000 will be allocated to gender-related activities. Both a Gender Assessment and a Gender Action Plan will be developed during the PPG phase, following GEF and UNEP guidelines, and the Gender Action Plan of the Minamata convention^[1] and will be conducted by a Gender Expert that will enhance the gender-responsiveness of the project. Key project staff and stakeholders will be trained on the Gender Action Plan, and all project indicators will be disaggregated by gender during the development of the logical framework. The Gender Expert, funded by the project, will ensure gender considerations and indicators are integrated into the logical framework and all activities. Gender mainstreaming and women's empowerment challenges are also included in the project's risk assessment.

For further information, please refer to Appendix 2 Gender Equality and Women's Empowerment Strategy.

^[1] <https://minamataconvention.org/en/gender>

A brief list of key stakeholders to be engaged in each country is detailed below and may vary based on country context:

- Ministry of Environment
- Ministry of Health
- Medicine Agencies
- Food and Drug Administrations
- Customs
- Ministry of Finance
- Ministry of Culture
- Ministry of Communication
- Ministry of Trade/Industry/Commerce
- Standards Bureau
- Consumer Affairs/Protection Authority
- Local municipalities/Police/Market Surveillance authorities
- Health Professionals (dermatologist, public health and preventive medicine, etc)
- WHO country and regional offices
- UNEP Global Mercury Partnership
- INTERPOL and INTERPOL national offices

- Local NGOs
- Regional and international NGOs
- Academia
- Manufacturers of SLPs
- Market managers and owners
- Beauty and aesthetic professionals
- Waste disposal facilities
- Local/regional/international influencers
- Online and informal retailers
- Youth organizations
- Public Schools/Universities
- Associations for importers/traders/manufacturers

For further information, please refer to Appendix 3 – Stakeholder Engagement Plan

Please refer to Appendix 4 for a list of names and dates of consultations during PIF development

^[1] <https://minamataconvention.org/en/gender>

(Please upload to the portal documents tab any stakeholder engagement plan or assessments that have been done during the PIF development phase.)

Private Sector

Will there be private sector engagement in the project?

Yes

And if so, has its role been described and justified in the section B project description?

Yes

Environmental and Social Safeguard (ESS) Risks

We confirm that we have provided indicative information regarding Environmental and Social risks associated with the proposed project or program and any measures to address such risks and impacts (this information should be presented in Annex D).

Yes

Overall Project/Program Risk Classification

PIF	CEO Endorsement/Approval	MTR	TE
Medium/Moderate			

E. OTHER REQUIREMENTS

Knowledge management

We confirm that an approach to Knowledge Management and Learning has been clearly described in the Project Description (Section B)

Yes

ANNEX A: FINANCING TABLES

GEF Financing Table

Indicative Trust Fund Resources Requested by Agency(ies), Country(ies), Focal Area and the Programming of Funds

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds	Grant / Non- Grant	GEF Project Grant(\$)	Agency Fee(\$)	Total GEF Financing (\$)
UNEP	GET	Regional	Chemicals and Waste	Mercury	Grant	15,000,000.00	1,350,000.00	16,350,000.00
Total GEF Resources (\$)						15,000,000.00	1,350,000.00	16,350,000.00

Project Preparation Grant (PPG)

Is Project Preparation Grant requested?

true

PPG Amount (\$)

300000

PPG Agency Fee (\$)

27000

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds	Grant / Non-Grant	PPG(\$)	Agency Fee(\$)	Total PPG Funding(\$)
UNEP	GET	Regional	Chemicals and Waste	Mercury	Grant	300,000.00	27,000.00	327,000.00
Total PPG Amount (\$)						300,000.00	27,000.00	327,000.00

Please provide justification

Sources of Funds for Country Star Allocation

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Sources of Funds	Total(\$)
Total GEF Resources					0.00

Indicative Focal Area Elements

Programming Directions	Trust Fund	GEF Project Financing(\$)	Co-financing(\$)
CW-2	GET	15,000,000.00	76626454
Total Project Cost		15,000,000.00	76,626,454.00

Indicative Co-financing

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Investment Mobilized	Amount(\$)
Civil Society Organization	European Environment Bureau	In-kind	Recurrent expenditures	100000
Private Sector	Sema Jonsson – Patheon of Women Who Inspire	In-kind	Recurrent expenditures	5000000
Private Sector	Clearya	In-kind	Recurrent expenditures	30000
Others	World Health Organization	In-kind	Recurrent expenditures	8000000
GEF Agency	UNEP Global Mercury Partnership	In-kind	Recurrent expenditures	2000000
Civil Society Organization	Groundworks	In-kind	Recurrent expenditures	50000
Civil Society Organization	Women Environmental Programme of Nigeria	In-kind	Recurrent expenditures	5000
Civil Society Organization	SRADEV Nigeria	In-kind	Recurrent expenditures	5000
Civil Society Organization	BYEI Africa (Nigeria)	In-kind	Recurrent expenditures	315600
Others	Occidental University	In-kind	Recurrent expenditures	150000
Civil Society Organization	IPEN Francophone Africa	In-kind	Recurrent expenditures	34810
Civil Society Organization	The Tides Center	In-kind	Recurrent expenditures	50000

Civil Society Organization	Mercury Policy Project	In-kind	Recurrent expenditures	200000
Civil Society Organization	Biodiversity Research Institute (BRI)	In-kind	Recurrent expenditures	664889
Civil Society Organization	Bio Vision Africa (BIVA) - Uganda	In-kind	Recurrent expenditures	150000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Burkina Faso	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Cote d'Ivoire	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Ethiopia	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Guinea	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Madagascar	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Mauritania	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Niger	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Nigeria	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Sierra Leone	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – South Africa	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Togo	In-kind	Recurrent expenditures	3000000
Recipient Country Government	National Ministries (Environment, Culture, Finance, Health, Custom, Communication, Trade) – Uganda	In-kind	Recurrent expenditures	3000000

Recipient Country Government	Cluster CHEC (Cosmetiques et Huiles Essentielles des Comores) - Industry Association in Comoros	In-kind	Recurrent expenditures	54850
Recipient Country Government	Ministry of Environment - Comoros	In-kind	Recurrent expenditures	8774005
Recipient Country Government	Ministry of Agriculture - National Institute for Research on Agriculture, Fisheries and the Environment – Comoros	In-kind	Recurrent expenditures	4171637
Recipient Country Government	Ministry of Finance, Budget and Banking Sector - Customs Department - Comoros	In-kind	Recurrent expenditures	8432551
Recipient Country Government	Ministry of Health, Solidarity, Social Protection and Gender Promotion - Comoros	In-kind	Recurrent expenditures	2438112
Total Co-financing				76,626,454.00

Describe how any "Investment Mobilized" was identified

Not Applicable

ANNEX B: ENDORSEMENTS

GEF Agency(ies) Certification

GEF Agency Type	Name	Date	Project Contact Person	Phone	Email
GEF Agency Coordinator	Global Environment Facility (GEF) OIC GEF Executive Coordinator, GEF Coordination Office Corporate Services Division, UNEP	2/26/2025	Mr. Ersin Esen	+41 22 917 8196	Ersin.esen@un.org
Project Coordinator	Portfolio Manager, GEF Chemicals and Waste Unit, Chemicals and Health Branch, Industry and Economy Division, UNEP	2/26/2025	Mr. Kevin Helps	+254 20 762 5062	Kevin.helps@un.org

Record of Endorsement of GEF Operational Focal Point (s) on Behalf of the Government(s):

Name	Position	Ministry	Date (MM/DD/YYYY)
Mr. Pamoussa Ouedraogo	Permanent Secretary	National Council for Sustainable Development (Burkina Faso)	2/10/2025
Mr. Youssouf Elamine Youssouf Mbechezi	Director General for Environment and Forests	Ministry of Agriculture, Fishing, Environment and City Planning (Comoros)	2/7/2025

Mrs. Ahou Sosthène Larissa Kouadio	Technical Advisor	Ministry of Finance and Budget (Cote d'Ivoire)	2/27/2025
Mr. Mensur Dessie Nuri	Director, Multilateral Environmental Agreements Negotiation Coordination	Ministry of Planning and Development (Ethiopia)	2/19/2025
Mr. Fodé Toure	Director General of Environment and Natural Capital Fund	Ministry of Environment and Sustainable Development (Guinea)	4/2/2025
Dr. Hery Andriamirado Rakotondravony	Minister	Ministry of Environment and Sustainable Development (Madagascar)	3/3/2025
Prof. Mohamed -Yahya Lafdal Chahe	Technical Advisor of Cooperation Partnership	Ministry of Environment and Sustainable Development (Mauritania)	2/7/2025
Dr. Mamane Bello	Director General of Planning and Programming Development	Ministry of Economy and Finance (Niger)	2/4/2025
Mr. Stanley Johan	Director	Federal Ministry of Environment (Nigeria)	2/4/2025
Mr. Sheku Mark Kanneh	Assistant Director, national Climate Change Secretariat	Environmental Protection Agency (Sierra Leone)	2/26/2025
Mr. Stuart Mangold	Chief Policy Advisor International Governance and Resource Mobilisation	Department of Forestry, Fisheries and the Environment (South Africa)	3/6/2025
Mr. Comlan Awougnon	Director of Administrative and Financial Affairs	Ministry of Environment and Forest Resources (Togo)	2/11/2025
Mr. Patrick Ocailap	Acting Deputy Secretary to the Treasure	Ministry of Finance, Planning and Economic Development (Uganda)	2/11/2025

ANNEX C: PROJECT LOCATION

Please provide geo-referenced information and map where the project interventions will take place

Given the nature of the project, there are no sites geo-reference information available as the trade, distribution and sale of SLPs are wide-spread and often informal across target countries. Therefore, only country locations are provided (Figure 2).

Geo Name ID <i>Required field if the location is not an exact site</i>	Location Name <i>Required field</i>	Latitude <i>Required field</i>	Longitude <i>Required field</i>	Location Description <i>Optional text field</i>	Activity Description <i>Optional text field</i>
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Burkina Faso	Ouagadougou	12.36566	-1.53388	Capital city of participating country	
Comoros	Moroni	-11.70216	43.25506	Capital city of participating country	
Côte d'Ivoire	Abidjan	5.35444	-4.00167	Capital city of participating country	
Ethiopia	Addis Ababa	9.02497	38.74689	Capital city of participating country	
Guinea	Conakry	9.53795	-13.67729	Capital city of participating country	
Madagascar	Antananarivo	-18.91368	47.53613	Capital city of participating country	
Mauritania	Nouakchott	18.08581	-15.9785	Capital city of participating country	
Niger	Niamey	13.51366	2.1098	Capital city of participating country	
Nigeria	Abuja	9.05785	7.49508	Capital city of participating country	
Sierra Leone	Freetown	8.49714	-13.2356	Capital city of participating country	
South Africa	Pretoria	-25.74486	28.18783	Capital city of participating country	
Togo	Lomé	6.12874	1.22154	Capital city of participating country	
Uganda	Kampala	0.31628	32.58219	Capital city of participating country	



Figure 2. Country Locations

ANNEX D: ENVIRONMENTAL AND SOCIAL SAFEGUARDS SCREEN AND RATING

(PIF level) Attach agency safeguard screen form including rating of risk types and overall risk rating.

Title

Annex D_Safeguard Risk Identification Form_final

ANNEX E: RIO MARKERS

Climate Change Mitigation	Climate Change Adaptation	Biodiversity	Land Degradation
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No Contribution 0

No Contribution 0

No Contribution 0

No Contribution 0

ANNEX F: TAXONOMY WORKSHEET

Level 1	Level 2	Level 3	Level 4
Influencing models			
	Transform policy and regulatory environments		
	Strengthen institutional capacity and decision-making		
	Convene multi-stakeholder alliances		
	Demonstrate innovative approaches		
Stakeholders			
	Private Sector		
		Large corporations	
		SMEs	
		Individuals/Entrepreneurs	
	Beneficiaries		
	Local Communities		
	Civil Society		
		Community Based Organization	
		Non-Governmental Organization	
		Academia	
		Trade Unions and Workers Unions	
	Type of Engagement		
		Information Dissemination	
		Partnership	
		Consultation	
		Participation	
	Communications		
		Awareness Raising	
		Education	
		Public Campaigns	
		Behavior Change	
Capacity, Knowledge and Research			
	Capacity Development		
	Knowledge Generation and Exchange		
	Targeted Research		
	Innovation		
	Knowledge and Learning		
		Knowledge Management	
		Innovation	
		Capacity Development	
		Learning	
	Stakeholder Engagement Plan		
Gender Equality			
	Gender Mainstreaming		
		Beneficiaries	
		Women groups	
		Sex-disaggregated indicators	
		Gender-sensitive indicators	
	Gender results areas		
		Participation and leadership	
		Access to benefits and services	
		Capacity development	
		Awareness raising	
		Knowledge generation	
Focal Areas/Theme			
	Chemicals and Waste		
		Mercury	
		Sound Management of chemicals and Waste	
		Waste Management	

			Hazardous Waste Management
		Disposal	
		Best Available Technology / Best Environmental Practices	