STAP SCREENING TEMPLATE

GEF ID	11877
Project title	Elimination of Mercury-Added Skin Lightening Products (SLPs) in Africa
Date of screen	21 May 2025
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1. **Summary of STAP's views of the project**

This project aims to eliminate mercury-added skin lightening products (SLPs) by limiting access in manufacturing and non-manufacturing countries (reducing supply) and shifting behaviours (reducing demand). The project will work towards jurisdictions adopting institutional and legal frameworks aimed at stemming formal and informal manufacturing, trade, and distribution, add capacity for testing products, and consider sound management at End-of-Life for existing products. Producing countries include South Africa, Côte d'Ivoire, Nigeria, Ghana, and Togo, with imports coming from other countries such as Pakistan and Thailand. Many countries have banned the use and importation of mercury- and hydroquinone-based cosmetics, with other countries working to pass legislation to restrict SLPs, but illegal trade and sales in physical and online markets continue to fill a deeply ingrained demand for these products. A previous deadline for mercury-containing SLPs was 2020, which was moved up to 2025. This project adds to ongoing initiatives to stem the use and distribution of mercury, e.g., International Cooperation on Cosmetics Regulation and Operation Pangea.

The proposal could be strengthened by clarifying whether activities will consider all SLPs or just those containing mercury, which is about 5% of SLPs sold in Africa. Are there "safe" SLPs? If not, then the proposal needs to be more explicit about the hazards associated with other SLP formulations. This is a key point that needs to be clarified since the strategies are very different depending on whether all SLPs or just mercury-containing SLPs are being targeted. Further, the activities currently focus on mercury-containing SLPs. What activities would be used to address other SLPs containing hazardous substances?

The proposal describes deeply embedded colourism that maintains widespread use of SLPs – demand. Some outputs are directed towards changing behaviour, such as promoting mandatory labelling. However, is this activity warranted in countries that have banned or which seek to ban mercury-containing SLPs and would be difficult to enforce in online sales? Many of the outputs are directed towards the supply side, such as increasing legislation, monitoring, and enforcement to reduce the supply. What fundamental changes are needed to reduce demand so that the supply is not driven underground, which is possible given that some or many producers are SMEs and cottage industries? Will "safe" SLPs be promoted as an alternative to mercury-containing SLPs, or will the outreach efforts aim to curtail all uses of SLPs?

Given the pervasive and culturally embedded use of SLPs, a critical outcome of the project could be generating insights on what activities are and are not effective at reducing demand for these products. Can legislation in producing countries be effective at choking off production of SLPs, especially given that producers are both formal and informal, and is a plan needed to transition these production facilities to safer personal care products? The need to address this possibility is mentioned in the risk analysis but not in the proposed activities.

Activities for monitoring and evaluation should be explained, as should uncertain futures that could draw upon the detailed risk analysis.

Note to STAP screeners: a summary of STAP's view of the project (not of the project itself), covering both strengths and weaknesses.

STAP's assessment*

☐   Concur - STAP acknowledges that the concept has scientific and technical merit

       ==Minor - STAP has identified some scientific and technical points to be addressed in project design==

☐   Major - STAP has identified significant concerns to be addressed in project design

Please contact the STAP Secretariat if you would like to discuss.

2. Project rationale, and project description – are they sound?

See annex on STAP's screening guidelines.

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1. **Systems thinking** is employed, starting with root causes and barriers to be addressed. The proposal rightly has identified the need to address supply and demand, and levers that could change demand (e.g., biomonitoring to show people with elevated mercury exposure). The proposal also takes a full life-cycle approach by identifying the need to reduce/stop production, curtail use, and provide guidance for End-of-Life management of SLPs.

2. **Baseline, barriers and enablers**
The project lays out baseline conditions that include the large and expanding market value and deeply embedded and systemic colourism and cultural norms. However, the important point that about 5% of SLPs sold in Africa contain mercury was listed late in the PIF under the risk analysis. Is the proposal aiming to tackle only this 5% of SLPs, in which case the goal becomes one of reducing their production and reducing the use of only this 5%?

About baseline conditions regarding legislation, the proposal is somewhat confusing by first citing that several countries have legislation that bans the use and importation of mercury-based cosmetics and that other countries are in the stages of passing legislation, yet comprehensive legal and policy frameworks are missing at country levels. The status of legislation on a country-by-country basis is clarified later in the proposal. Presumably, the barrier is insufficient product monitoring in countries with legislation to ensure compliance? Are all countries in need of legislative initiatives?

In terms of barriers, is the growth of online sales presenting new challenges for regulatory control and/or compliance monitoring? This is a very difficult challenge. What strategy could be used to stem online sales of mercury-containing SLPs? Is another barrier or challenge the supply chains that include small-scale product formulators?

The project description does well to list stakeholders that presumably will act as enablers. However, are the numerous government ministries with some oversight a barrier since inter-ministerial coordination (policy coherence) is needed?

3. **Uncertain futures** are not discussed but should be. One future to consider is the potential for more mercury available for use in these SLP products as mercury use is curtailed in other applications, e.g, "sector jumping" of mercury use. Is there an opportunity to work with ASGM projects to try to reduce possible mercury-use shifting from that sector to cosmetics?

4. **Theory of Change (ToC)** starts with a clear goal statement.
- Assumptions could be more complete. It seems like a key but implicit assumption is that engaging key stakeholders could reduce demand. In other words, some of the key stakeholders could be enablers of positive behaviour change. Another unstated assumption is that information from biomonitoring can be effectively communicated to cause reduced SLP use. Mercury biomonitoring could be difficult and expensive, so a clear justification needs to be made for its inclusion (although mercury biomonitoring could use a less expensive and less invasive indicator, such as hair).
- Causal pathways could be clearer in identifying those pathways directed towards reducing supply (e.g., better legislation and enforcement) vs demand (e.g., increasing awareness of health risks of using SLPs).

The ToC mostly focuses on supply, but the baseline conditions describe deeply embedded colourism that maintains demand.

- Barriers and enablers have been discussed above but could be woven into the ToC to show that they have been accounted for.
- "Positive" drivers are identified, but their description could be improved by clearly separating those aimed at supply- vs demand-side outcomes. The ToC could benefit from including "negative" drivers of embedded behaviour.
- The proponent should incorporate MSMEs and the informal sector into the ToC, especially the interventions, as they can play an important role in achieving project objectives.

5. **Project Components**

1. *Regulatory frameworks by building institutional capacity, pathways to discontinue formal and informal manufacturing and sale, analyze health impacts based on SLP use*. This component would benefit from explaining measures taken to promote policy coherence.

2. *Improve understanding of SLP trade and user behaviour by SLP identification and testing of store and online products, document behavioural change*. What constitutes "safe" disposal of mercury-containing SLPs? Are those facilities available and is storage secure to ensure that the mercury destined for SLPs is not used in the same or other sectors, e.g, "sector jumping"?

3. *Enhanced enforcement and compliance monitoring to reduce manufacturing and trade through regular monitoring and inspection, and enforcement*. What type of training would enable customs and trade officials to identify and remove SLPs from import/export flows? How can online and in-store products be monitored? What is a "detention" list? Who will disseminate, and how effective would a health advisory/alert system be in reducing demand?

4. *Improved knowledge sharing of communication campaigns at global, national and regional scales*. Noted above is that the proposal could be more explicit about the opportunities to better understand measures that are most and least effective in shifting behaviours that underpin the use of SLPs. Presumably, the development of gender-specific communication campaigns includes information targeting men since the description of baseline conditions describes men's usage of SLPs, as well as the dominant market being women. Will the information campaign also include information about the hazards of using SLPs on young children?

5*. Monitoring and evaluation* are not explicitly discussed.

6. **Sectors and stakeholders** are identified in the proposal including government ministries, health professionals, industry associations, UN Women and Civil Society Organizations. Numerous stakeholders are listed as providing in-kind support.

The proposal acknowledges that the formulation and re-formulation of SLPs are widespread among small-scale and cottage industries, but it overlooks the opportunity to meaningfully incorporate MSMEs and the informal sector. MSMEs and informal actors are pivotal to the production, distribution, and sale of SLPs, particularly both within and across borders where high demand, a ready market, and limited regulatory oversight intersect. While they often operate outside formal regulatory systems, they contribute to both the challenges and the solutions, and hold potential as key agents of change. Engaging them, especially through their umbrella bodies via targeted education, capacity building, and incentives to adopt safer, compliant practices, could be instrumental in curbing SLPs, enhancing health and protection of the livelihoods of those engaged in this sector

7. **Contribution to GEBs** seems reasonable.

8. **Policy coherence** is needed in the project given the number of government ministries that have some authority over SLPs, e.g., health, food and drug, and customs. These ministries are listed as providing in-kind support.

9. **Alignment with current GEF investments.** This project builds from the ongoing MSP on SLPs with efforts taken to learn the best and most effective practices.

10. **Knowledge management (KM)** is a central element of this project and is described under component 4.

11. I**nnovation and scalability.** This project builds on an MSP SLP project and includes a stage of learning best practices from this MSP project. This project will also align this FSP with the second part of the MSP in several countries in LAC and Asia.

12. **Monitoring and evaluation** are not discussed.

13. **Risks** are well described with details that will, presumably, be used in the full proposal.

Note: provide a general appraisal, asking whether relevant screening guideline questions have been addressed adequately – not all the questions will be relevant to all proposals; no need to comment on every question, only those needing more attention, noting any done very well, but ensure that all are considered. Comments should be helpful, evaluative, and qualitative, rather than yes/no.

3. **Specific points to be addressed, and suggestions**

The proponent should address the points raised in Section 2 above, as well as the points below.

1. The proposal could be improved by explicitly identifying reasons for the continued use, if not expansion, of the production and use of mercury-containing SLPs, especially since 2017 saw the launch of a campaign to eliminate the addition of mercury to SLPs by the European Environmental Bureau and the Zero Mercury Working Group. This negative driver of continued, if not expanding use of SLPs. should be included in the ToC.

2. The proposal needs to clarify whether just mercury-containing or all SLPs are being targeted for removal from the market. If all SLPs, then a justification is needed to discuss activities related to all SLPs since the proposal emphasizes activities related to mercury-containing SLPs.

2. The proposal could be improved by more clearly distinguishing supply vs demand-side outputs and activities, with clear logic pathways in a revised ToC.

3. The proposal could be improved by tailoring the activities and outcomes, including social outreach activities, to each country or region.

4. More information could be provided on efforts to seek funding from private entities such as cosmetic producers.

5. The proposal needs details of monitoring and evaluation activities.

6. The proponent should incorporate MSMEs and the informal sector into the ToC, especially the interventions, as they can play an important role in achieving project objectives (see Section 2).

Note: number key points clearly and provide useful information or suggestions, including key literature where relevant. Completed screens should be no more than two or three pages in length.

*categories under review, subject to future revision

Project rationale

1. How well does the proposal explain the problem and issues to be addressed in the context of the **system** within which the problem sits and its drivers (e.g. population growth, economic development, climate change, sociocultural and political factors, and technological changes), including how the various components of the system interact?

2. Does the project indicate how **uncertain futures** could unfold (e.g. using simple **narratives)**, based on an understanding of the trends and interactions between the key elements of the system and its drivers?

3. Does the project describe the **baseline** problem and how it may evolve in the future in the absence of the project; and then identify the outcomes that the project seeks to achieve, how these outcomes will change the baseline, and what the key **barriers** and **enablers** are to achieving those outcomes?

4. Are the project's **objectives** well formulated and justified in relation to this system context? Is there a convincing explanation as to **why this particular project** has been selected in preference to other options, in the light of how the future may unfold?

5. How well does the **theory of change** provide an "explicit account of how and why the proposed interventions would achieve their intended outcomes and goal, based on outlining a set of key causal pathways arising from the activities and outputs of the interventions and the assumptions underlying these causal connections".

   - Does the project logic show how the project would ensure that expected outcomes are **enduring** and resilient to possible future changes identified in question 2 above, and to the effects of any conflicting policies (see question 9 below).
   - Is the theory of change grounded on a solid scientific foundation, and is it aligned with current scientific knowledge?
   - Does it explicitly consider how any necessary **institutional and behavioral** changes are to be achieved?
   - Does the theory of change diagram convincingly show the overall project logic, including causal pathways and outcomes?

6. Are the project **components** (interventions and activities) identified in the theory of change each described in sufficient detail to discern the main thrust and basis (including scientific) of the proposed solutions, how they address the problem, their justification as a robust solution, and the critical assumptions and risks to achieving them?

7. How likely is the project to generate global environmental benefits which would not have accrued without the GEF project (**additionality**)?

8. Does the project convincingly identify the relevant **stakeholders**, and their anticipated roles and responsibilities? is there an adequate explanation of how stakeholders will contribute to the development and implementation of the project, and how they will benefit from the project to ensure enduring global environmental benefits, e.g. through co-benefits?

9. Does the description adequately explain:

    - how the project will build on prior investments and complement current investments, both GEF and non-GEF,
    - how the project incorporates **lessons learned** from previous projects in the country and region, and more widely from projects addressing similar issues elsewhere; and
    - how country policies that are contradictory to the intended outcomes of the project (identified in section C) will be addressed (**policy coherence**)?

10. How adequate is the project's approach to generating, managing and exchanging **knowledge**, and how will lessons learned be captured for adaptive management and for the benefit of future projects?

11. **Innovation and transformation:**
    - If the project is intended to be **innovative:** to what degree is it innovative, how will this ambition be achieved, how will barriers and enablers be addressed, and how might scaling be achieved?
    - If the project is intended to be **transformative:** how well do the project's objectives contribute to transformative change, and are they sufficient to contribute to enduring, transformational change at a sufficient scale to deliver a step improvement in one or more GEBs? Is the proposed logic to achieve the goal credible, addressing necessary changes in institutions, social or cultural norms? Are barriers and enablers to scaling be addressed? And how will enduring scaling be achieved?

12. Have **risks** to the project design and implementation been identified appropriately in the risk table in section B, and have suitable mitigation measures been incorporated? (NB: risks to the

durability of project outcomes from future changes in drivers should have been reflected in the theory of change and in project design, not in this table.)