

GEF-8 PROJECT IDENTIFICATION FORM (PIF)

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General Project Information

Project Title

Elimination of Mercury-Added Skin Lightening Products (SLPs) in Asia, Latin America and the Caribbean

Region

Global

GEF Project ID

12353

Country(ies)

Global

Antigua and Barbuda

Cambodia

Mexico

Pakistan

Philippines

Type of Project

MSP

GEF Agency(ies):

UNEP

GEF Agency ID

N/A

Executing Partner

Biodiversity Research Institute (BRI)

Executing Partner Type

CSO

GEF Focal Area (s)

Chemicals and Waste

Submission Date

5/22/2026

Project Sector (CCM Only)

Taxonomy

Influencing models, Strengthen institutional capacity and decision-making, Transform policy and regulatory environments, Convene multi-stakeholder alliances, Demonstrate innovative approaches, Stakeholders, Private Sector, SMEs, Large corporations, Individuals/Entrepreneurs, Local Communities, Civil Society, Trade Unions and Workers Unions, Non-Governmental Organization, Academia, Community Based Organization, Communications, Behavior change, Public Campaigns, Awareness Raising, Type of Engagement, Information Dissemination, Participation, Consultation, Partnership, Capacity, Knowledge and Research, Capacity Development, Targeted Research, Innovation, Knowledge Generation, Knowledge Exchange, Gender Equality, Gender Mainstreaming, Gender-sensitive indicators, Sex-disaggregated indicators, Beneficiaries, Women groups, Gender results areas, Knowledge Generation and Exchange, Participation and leadership, Focal Areas, Chemicals and Waste, Waste Management, Sound Management of chemicals and waste, Mercury, Best Available Technology / Best Environmental Practices

Type of Trust Fund

GET

Project Duration (Months)

60

GEF Project Grant: (a)

5,000,000.00

GEF Project Non-Grant: (b)

0.00

Agency Fee(s) Grant: (c)

475,000.00

Agency Fee(s) Non-Grant (d)

0.00

Total GEF Financing: (a+b+c+d)	Total Co-financing
5,475,000.00	13,495,626.00
PPG Amount: (e)	PPG Agency Fee(s): (f)
150,000.00	14,250.00
PPG total amount: (e+f)	Total GEF Resources: (a+b+c+d+e+f)
164,250.00	5,639,250.00

Project Tags

CBIT: No NGI: No SGP: No Innovation: No Competitive Window: 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)

This proposed project aims to support Parties to the Minamata Convention on Mercury in meeting their obligations under Article 4 by phasing out mercury-added skin-lightening products (SLPs). It seeks to replicate best practices from Asia, Latin America and the Caribbean, targeting both manufacturing and non-manufacturing countries. The project will focus on eliminating manufacturing of mercury-added SLPs, as well as their sale from physical retail outlets and online marketplaces. It will encourage voluntary product safety pledges from online platforms, with an emphasis on mercury-added cosmetics. For Antigua and Barbuda, the project provides the option to engage within a regional framework where economies of scale could offer added benefits.

By limiting manufacturing and access to these harmful products and fostering an enabling environment, the project will support the adoption of strong institutional and legal frameworks to reduce both formal and informal manufacturing, trade, and local and online distribution. Laboratory capacity will be strengthened through the procurement of detection equipment, which will also help improve understanding of trade patterns and emerging trends. To reduce demand, the project will conduct comprehensive behavioral studies to explore user motivations and identify strategies to discourage the use of SLPs. Consumer safety will be further supported through enhanced compliance and enforcement measures within and across neighboring countries. These include training for customs and trade officials, development of detention lists, and implementation of surveillance systems. The project will also promote self-regulation and internal compliance mechanisms within relevant industries. In addition, the initiative will support the development of comprehensive strategies to reduce both the supply and demand for mercury-added SLPs. It will foster global awareness, promote South-South cooperation, and facilitate knowledge sharing in collaboration with diverse stakeholders. Gender mainstreaming, along with the active engagement of youth and marginalized communities, will be a core priority throughout implementation.

The successful phase-out of mercury-added SLPs in the target countries is projected to reduce mercury emissions and circulation of mercury added SLPs by approximately 2.49 and 89 tons, respectively. The project is expected to directly benefit over 4.95 million people, including more than 4.33 million women and 620,000 men.

Indicative Project Overview

Project Objective

To reduce the manufacture, trade, sale and use of mercury-added skin lightening products in Asia, Latin America and the Caribbean

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 (\$)
1,012,112.00	2,813,393.00

Outcome:

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

Output:

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

Output 1.2: Gender responsive national roadmaps implemented with national authorities to discontinue formal and informal manufacture and sale of mercury-added SLPs

2. Enhancing supply chain management and controls

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
1,311,191.00	3,263,279.00

Outcome:

2. Improved understanding on mercury-added SLPs trading patterns and user behavior changes

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: Behavioral research tools adapted at national level targeting SLP users to better understand behavior and motivation changes

3. Strengthening enforcement and consumer safety controls

Component Type	Trust Fund
Technical Assistance	GET

GEF Project Financing (\$)	Co-financing (\$)
1,101,761.00	3,086,310.00

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, market surveillance, and inspection of mercury-added SLPs improved

3.2 Enforcement actions planned 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 (\$)
1,099,091.00	3,335,432.00

Outcome:

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

Output:

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

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

M&E

Component Type	Trust Fund
Technical Assistance	GET
GEF Project Financing (\$)	Co-financing (\$)
237,750.00	362,407.00

Outcome:

5. Project achieves its objective on time through effective M&E

Output:

5.1 Midterm review and terminal evaluation completed

5.2 Annual project steering committee meetings conducted

5.3 Quarterly expenditure and progress reports prepared by the executing agency with high quality and submitted on time to the implementing agency

Component Balances

Project Components	GEF Project Financing (\$)	Co-financing (\$)
1. Strengthening legal and regulatory framework to manage mercury-added SLPs	1,012,112.00	2,813,393.00
2. Enhancing supply chain management and controls	1,311,191.00	3,263,279.00
3. Strengthening enforcement and consumer safety controls	1,101,761.00	3,086,310.00
4. Knowledge management and awareness raising	1,099,091.00	3,335,432.00
M&E	237,750.00	362,407.00
Subtotal	4,761,905.00	12,860,821.00
Project Management Cost	238,095.00	634,805.00
Total Project Cost (\$)	5,000,000.00	13,495,626.00

Please provide justification

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 Asia, Latin America and the Caribbean

Skin lightening is the practice of using pharmacologically active ingredients to whiten skin, including the face, hands, legs, and any other part of the body. Skin-lightening, whitening, and bleaching products are widely used and have become common practice in many parts of the world. Their use is

prevalent among both men and women in Africa, Asia, Middle East, Latin America, and the Caribbean, as well as in developed countries across Europe and North America, raising significant concerns for human and environmental health. In addition, studies across various regions indicate that prevalence of SLP use can range from 27% to 77% among sampled communities, with women accounting for majority of the market.

Skin lightening has deep cultural roots across Asia, where fair skin is historically linked to beauty ideals and social status, and can affect marital prospects, job opportunities, and earning potential^{[1]¹}. Media across multiple Asian countries portray lighter and smoother skin as ideal^{[2]²}, helping drive significant growth in SLP use^{[3]³}. In South Asia, SLPs dominate the skincare market and are shaped by entrenched sociocultural associations between fairness and social mobility^{[4]⁴}. In Southeast Asia, use of SLPs also remain prevalent. Studies indicate that up to 60% of individuals in this region use such products^{[5]⁵}. In a recent study, researchers purchased 134 SLP products online and revealed that over 58% contained mercury levels exceeding 1 ppm of mercury, with mercury concentrations as high as over 140,000 ppm^{[6]⁶}. Sampling from the Zero Mercury Working Group in 2023, showed that based on the product packaging, 121 of the 191 samples were manufactured in or distributed from Pakistan (34%), Thailand (17%) and China (13%)^{[7]⁷}. The SLP market in Asia is substantial and continues to grow and expand, impacted by factors such as increasing disposable income, harmful beauty standards, and the influence of social media. The Asia-Pacific region accounts for a majority of the global SLP market, projected to reach over USD 9 billion by 2030^{[8]⁸}. Additionally, non-traditional markets—such as e-commerce—are making SLP products more accessible across Asia. While strong cultural drivers continue to anchor demand, the market continues to be further shaped by these modern consumer trends.

Skin lightening market in Latin America is valued at approximately USD 280 million with projections to reach USD 520 million by 2033^{[9]⁹}. In Mexico, a study analyzed 16 SLPs from the local market where 6 products contained mercury concentrations ranging from 878 to 36,000 ppm^{[10]¹⁰}. Another study undertaken by Centers for Disease Control and Prevention (CDC) revealed that unlabeled skin-lightening creams produced in Mexico were identified as the source of mercury exposure in U.S. households, affecting both users and nonusers through indoor contamination. Elevated mercury levels were detected in 15 individuals, and high vapor concentrations near stored creams prompted health alerts and public warnings^{[11]¹¹}. Moreover, the

California Department of Public Health^[12]^[12] has tested and maintains a list of skincare products that contain mercury – many of them list Mexico as country of origin.

Across the Caribbean, SLPs have been popular items found in formal and informal markets with mercury-added SLPs being imported in the region as well as being manufactured by at least one company found in the region⁷. Through BRI's coordinated efforts with the Department of Analytical Services, Antigua and Barbuda in 2021 and ZMWG in 2018, approximately 119 SLPs were sampled in total in Antigua and Barbuda, of which 8% were found to contain mercury ranging from 2ppm to 18,000 ppm^[13]^[13]^[14]^[14].

SLPs come in different forms (e.g., creams, soaps, lotions, gels, scrubs, 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 or in the ingredient list. When used without medical supervision or misused for cosmetic purposes, many of these ingredients have adverse health effects on the user. Mercury found in SLPs is often in inorganic form (e.g., mercury salts, including mercuric amido chloride, mercurous chloride etc.), and is highly effective in inhibiting melanin production leading to a lighter skin tone^[15]^[15]. Since mercury can often be replaced with other hazardous ingredients, such as hydroquinone or corticosteroids, it is important to understand the underlying motivations for using these products and implement targeted interventions. Such strategies could help reduce the practice of skin-lightening worldwide. Mercury poses serious health risks to both men and women including kidney damage, neurological disorders. Exposure to mercury is especially concerning in women of reproductive age, as it can cross the placenta and interfere with neurological development of the fetus. It is also associated with an increased risk of miscarriage, low birth weight, spontaneous abortion, and early childhood development^[16]^[16]. Consumers and manufacturers of mercury-added SLPs are often unaware of the significant health hazards associated with their use.

The danger does not just exist for those who use mercury-added SLPs but also for their families and household members who may become exposed in the home through a variety of contact points, including by using washcloths or towels contaminated with mercury or through skin-to skin-contact. Moreover, release of mercury vapor released during SLP application, can further contaminate the surrounding environment and contribute to global mercury pollution. Mercury that has not evaporated or been dermally absorbed from SLPs is eventually washed off and discharged into wastewater systems through regular washing and showering. This contamination can affect water quality and can lead to the methylation of mercury, which has the potential to bioaccumulate in fish and other aquatic organisms, ultimately entering and contaminating the human food chain. Furthermore, improper disposal and widespread use of mercury in SLPs expand beyond individual human health risks, highlighting potential consequences on a regional and global scale.

In Asia, the SLP market is composed of both formal and informal sectors. The formal market is substantial, where products are available for purchase at pharmacies, retailers, department stores, and e-commerce platforms. Informal “cottage production” has also become an increasingly notable trend, where small-scale practice mixing multiple SLPs that often contain harmful ingredients (e.g., mercury, hydroquinone,

corticosteroids) to increase their potency. These home-mixed products are frequently promoted on social media, with sellers posting videos that demonstrate how to mix SLPs with various additives. Since these operations are largely unregulated, the products evade many safety controls, and they can be distributed through a variety of channels, from local markets and street vendors to e-commerce platforms. Together, the formal and informal markets illustrate the dual nature of Asia's SLP landscape, both large-scale production and decentralized, high-risk informal manufacturing. In Latin America, a somewhat parallel system operates. While some SLPs are produced by legitimate cosmetics manufacturers, a large share comes from informal or unregulated producers.

Out of the target countries, only Cambodia and the Philippines are part of a regional ban on the use and import of mercury and hydroquinone in cosmetic products. However, other countries are in different stages and taking actions on restricting and controlling mercury content of the SLPs that are available for sale in their country, with some implementing partial restrictions, labelling requirements, or maximum allowable mercury limits in SLPs. Despite these efforts, enforcement remains weak, and illegal import and sale of mercury-added SLPs, whether in physical markets or through online platforms, continue to proliferate across regions. These products continue to circulate not only in traditional psychical markets but also through rapidly online platforms, social media marketplaces, and cross-border e-commerce channels. Moreover, consumers can easily circumvent national regulations by purchasing SLPs abroad and bringing them back in their personal luggage, further complicating efforts to control the availability of toxic SLPs. The combination of limited enforcement capacity, inconsistent regulation, and globalized consumer access underscores the persistent challenge of reducing exposure to harmful ingredients across regions.

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. This is also important because it can allow developing countries to utilize lower cost handheld testing devices to determine whether a product had mercury. By removing the 1ppm mercury threshold, countries that adopt such regulations could sidestep the need for lab capacity and all associated expenses/resources necessary. During Minamata COP6, the Parties welcomed the report prepared based on decision MC-5/5 to collect information on challenges in preventing manufacture, import and export of mercury-added SLPs. The COP also invited the Minamata Secretariat and the Global Mercury Partnership to gather and provide to COP7 on available mechanisms for supporting enforcement and identification of mercury in cosmetics, including field sampling and analysis equipment. And for the Secretariat to: 1) continue to compile and synthesize information based on national reports, related to the challenges in preventing the manufacturing, import and export of mercury added cosmetics; 2) work with World Customs Organization, International Criminal Police Organization (INTERPOL) with expertise in illegal trade of products to further investigate the major sources of manufacturing, import and export of mercury added cosmetics. Finally, the COP invited WHO to work with the Global Mercury Partnership, to prepare an illustrative national public health system wide strategy focused on reduction measures for mercury added cosmetics, and for SLPs that may not contain mercury. 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 and incremental costs reasoning

The proposed project addresses the incremental costs associated with achieving the obligations of the Minamata Convention's zero-tolerance approach to mercury-added cosmetics, including SLPs. While countries are responsible for implementing baseline regulatory and enforcement measures, GEF financing is required to overcome the additional barriers associated with eliminating mercury-added SLPs across their complex lifecycle, including manufacturing, import, export, distribution, advertising, marketing, sale, use, and environmentally sound disposal. The project is designed to address the following root causes/barriers and support coordinated interventions that strengthen regulatory frameworks, market surveillance, customs controls, compliance monitoring, consumer awareness, private sector engagement, and waste management systems. These activities generate global environmental benefits by reducing mercury releases to the environment and human exposure to mercury, while addressing transboundary trade and supply chains that extend beyond the scope of national baseline investments.

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.

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 their 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 are crucial for identifying the source of these products, assessing their mercury concentrations, as well as tracking their 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 of these products. Finally, clear guidelines are limited 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 of holding sellers accountable, conducting enforcement and assuring responsiveness. The absence of SLP industries' ability to self-regulate, 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 insufficient training for customs and health officials to conduct market surveillance. For this to occur, there is a clear need for the development of a system that promotes self-regulation and internal compliance mechanisms of the industries in the SLP business and for governments to provide oversight through active engagement and regular reporting. Detention lists, surveillance systems, or alert mechanisms at the community or national level are tools that could be easily accessed by various national stakeholders. Nevertheless, existing tools from organizations like OECD and UNCTAD^[17]¹⁷, 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 natural skin color related advertising and marketing

In Latin America, as in Asia, skin lightening practices are deeply intertwined with historical and sociological legacies of colorism and racial stratifications. Sociological research has consistently shown that skin color is a strong predictor of socioeconomic outcomes^[18]¹⁸. For example, in Mexico, lighter skinned individuals tend to attain higher levels of education and earn more than darker skinned individuals, when controlling for other variables⁸. Colorism in Latin America reflects colonial era hierarchies in which social mobility and "whiteness" have historically been linked^[19]¹⁹. Scientific research in the region therefore frames skin lightening not merely as a cosmetic practice but as a phenomenon rooted in racialized social hierarchies, with real implications on health, identity, and inequality.

There is a general low level of awareness and knowledge among both the public and healthcare professionals surrounding 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 SLPs over centuries highlights the enduring legacy of skin bias. The practice of skin lightening often starts at a young age, with the risk increasing among young adults seeking employment or romantic partners. The practice is frequently introduced by family members or close friends, which normalizes its use and creates peer pressure – further encouraging continued use. Additionally, the availability and affordability of the products and social acceptability of skin lightening practices, together with low levels of awareness and knowledge, 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 level to educate the public about the collective health and environmental impacts of skin-lightening practices and to promote mindset and behavioral change.

Despite the known risks associated with SLPs, their use remains widespread globally. Motivation for continued use SLPs vary by individual, even among those who are aware of the associated

dangers. Colorism—a deep-rooted form of skin color discrimination^{[20]²⁰}— remains a central driver, reinforcing beauty standards, social status pressures, societal perceptions. These dynamics are further amplified by social media ultimately driving individuals toward the use of harmful products. In addition, the historical and cultural association between skin color and social status continues to motivate skin-lightening practices in many countries, particularly in regions shaped by colonial histories.

3. Country Selection

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

- Be a Party of Minamata Convention
- 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
- Have not received GEF support on the same topic previously or can justify the need for additional assistance

4. Key Stakeholders

As part of project development, a preliminary list of stakeholders has been identified:

- **Ministries of Environment, Health and Education** 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.
- **GEF Operational Focal Points, Minamata Focal Point and all other Technical Focal Points** in the target countries will be informed quarterly on project progress and be invited to project meetings as appropriate.
- **National Environmental, Food and Drug, and/or Trading Standards, Consumer Protection and State agencies (e.g. California Department of Public Health)** will play a key role in controlling and regulating the trade and distribution of skin lightening products in the physical and online markets.
- **Customs Agencies** will contribute to curbing the trade of mercury, mercury compounds and mercury-added skin lightening 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 support on policy recommendations, supply chain measures, waste management, global knowledge

sharing and communications. The Project Stakeholder Group initiated under the 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** 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, UNICEF and related national Ministries** – 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 for Dermatology will play a key role in disseminating public health messages and implementing health education and other interventions
- **Industry associations** such as the Philippines Cosmetic Industry Associations including Chamber of Cosmetics Industries in the Philippines and the Cosmetics, Toiletries and Fragrances Association of the Philippines, Pakistan Cosmetic Manufacturers Association (PCMA), CANIPEC of (Mexico) will serve as an important channel for broader industry engagement.
- **Civil Society Organizations (CSOs) especially women, youth and parents focused organizations** 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 behaviors. CSOs can also advocate to 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. Examples are Ban Toxics and EcoWaste (Phi), CASACEM (Mxc), Sustainable Development Policy Institute (SDPI, Pakistan) and Integrated Health Outreach (IHO) (Antigua and Barbuda)
- **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.
- **Asian, Latin American and the Caribbean beauty brands, such as LUSH**, that are leaders in promoting toxic free products and local ingredient will be involved to harness local ownership, entrepreneurship and promote 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, especially medical schools**, for example UC Santa Barbara and University of the West Indies (Jamaica and Trinidad and Tobago Campuses)^{[21]²¹}, American University of Antigua School of Medicine, Asian Institute of Technology (AIT), the University of the Philippines Manila, 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 and religious community leaders, 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.
- **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 Brazilian photographer – Angelica Dass and former Miss America of Asian heritage – Nina Davulri, more in-depth mapping and engagement will be undertaken during inception phase.
- **Intergovernmental/regional bodies**, such as BCRC-Caribbean, SCRC Uruguay, BCRC Argentina, CARICOM, CROSQ, CARPHA (health related communication), BCRC Indonesia, ASEAN Cosmetic Committee and Working Group on Chemicals and Waste, can assist in regional harmonization of policies, strategies especially related to trade and sale of SLPs in the respective regions.

5. Associated baseline

Globally

The global skin lightening products industry had an estimated market value of \$9.2 billion in 2023 and is expected to reach \$14 billion by 2032^{[22]²²} with Asia Pacific region dominating the market with a 53.69% share in 2023^{[23]²³}. Hundreds of millions of users globally use mercury-added SLPs each year^{[24]²⁴} which are 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)^[25], 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 from both formally^[26] and informally manufacturers.

A campaign on the elimination of mercury-added skin lightening products was launched in 2017^[27], coordinated 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^[28]. Eight reports have been published, including one on enforcement. Furthermore, several CSOs in Asia and LAC, such as Ban Toxics and EcoWaste Coalition in the Philippines and SDPI in Pakistan, CasaCem in Mexico, IHO in Antigua and Barbuda, have been involved and supported in different capacities to assist their governments to tackle this crisis.

Online sales of mercury-added SLPs are 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.^[29] 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.^[30] Strong examples of regulatory approaches to governing e-commerce cosmetic sales were demonstrated by Gabon and Sri Lanka, both of which have incorporated bans on online cosmetic sales into their national cosmetic regulations. In contrast, the European Union applies a voluntary approach under Regulation (EC) No. 1223/2009^[31], which does not assign direct responsibility to online platforms. Instead, through the EU Product Safety Pledges, agreements are established with online platforms to remove non-compliant or unsafe products from their marketplaces. EU Regulation 1223/2009 governs the supply and sale of cosmetic products within the European Union and establishes several key requirements, including mandatory notification to authorities prior to placing products on the EU market, assurance of product safety, prohibitions and restrictions on certain substances, and clear labeling and consumer information requirements.

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[32]³². 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[33]³³. Multiple outreach events were undertaken to further raise global awareness, including for example a policy event at COP6 “Detoxifying Cosmetics and Beauty Ideals: Global voices and solutions to reduce demand for mercury and skin lightening” [34]³⁴ and a public event: “Detoxifying Cosmetics and Beauty Ideals - Where policy meets art”[35]³⁵. The partnership has been also instrumental in driving the discussion in the context of human rights and fighting against racial discrimination. By partnering with the Minamata Convention Secretariat, it has launched a UNEP wide social media campaign on Tackling Mercury Pollution and Racial Discrimination jointly[36]³⁶ and supported an event on “Unmasking Mercury and Colorism in Cosmetics”[37]³⁷. Furthermore, collaboration with prominent artists—including Brazilian photographer Angélica Dass, author of *Humanae*—has led to a joint art exhibition with the City of Geneva, featured in the margins of the Minamata COP6 [38]³⁸. UNEP, through the Global Mercury Partnership and the ongoing MSP project, has also engaged with the private sector cosmetics company LUSH, who, as a result, launched a communication campaign to end colorism and eliminate mercury in cosmetics across its 260+ stores in North America and contributed to awareness raising among global consumers[39]³⁹.

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. Under a contract with WHO and under the GEF 10810 project, the EEB/ZMWG has been working with Sri Lanka, Gabon and Jamaica: identified policies and regulations in place banning illegal products to use as leverage to bring marketplaces to the table; identified platforms and mercury-added skin lightening products. Eventually these suspected products were found on the identified platforms. Furthermore the [Sri Lanka, Consumers Affairs Authority](#) (CAA) and [Gabon, ANMAPS](#) developed, adopted and published prohibited products lists. In Sri Lanka: CAA sent letter to 48 Platforms, followed by a meeting between Authorities/platforms. EEB/ZMWG assisted CAA to draft a Voluntary Agreement (VA) which is now under discussion with one major platform, and furthermore a more extensive guidelines/policy which is now under discussion towards adoption.

Beyond this work, the EEB/ZMWG surveyed and reviewed existing product safety pledges (PSPs) and developed different models of voluntary or hybrid approaches, to be used by countries to cooperate with platforms-complementing national policies related to Hg/SLPs. VAs are derived from PSPs but scaled back, as they are only focused on cosmetic product safety, whereas PSPs require interagency collaboration and capacity, staffing and commitment over the long run in dealing with multiple online platforms. The organizations further drafted guidance on how to develop such voluntary approaches, a guidance on best practice approaches to phase out online sales of Hg/SLPs as well as a methodology for estimating SLPs sold on-line. These tools are expected to be used in the proposed project and implemented in the project countries.

Finally, the main deliverables from Project 10810 listed below will be utilized and further refined based on new data:

- a. Regulatory toolkit, including model legislation
- b. Behavioral insights tools
- c. Online sales assessment tools
- d. Supply chain analysis: *Tracing the Supply Chain of Mercury-Added Skin-Lightening Cosmetics in Jamaica, Gabon, and Sri Lanka*
- e. Global database containing analytical results on SLPs and manufacturing and distribution patterns
- f. Sampling and analysis protocols
- g. Customized training materials
- h. Knowledge hub <https://www.unep.org/globalmercurypartnership/our-work/mercury-products/eliminating-mercury-skin-lightening-products>
<https://www.unep.org/globalmercurypartnership/our-work/mercury-products/eliminating-mercury-skin-lightening-products>

Analysis from the Existing Global Database

The global database developed under the GEF 10810 *Eliminating Mercury in Skin-Lightening Products (SLPs)* project consolidated results from more than 4,000 SLP samples assessed for mercury content. These data were compiled from the three project countries—Jamaica, Gabon, and Sri Lanka—as well as peer-reviewed scientific literature and verified datasets from different NGOs and monitoring agencies. The samples span the period from 2001 to 2025.

In Asia, the data indicate that Pakistan and Mexico are among the largest exporters of SLPs in terms of both volume and mercury content. Pakistan features prominently in the dataset: many of the products with the highest mercury concentrations were manufactured there, and Pakistani-made SLPs were exported to more than 30 countries, including the USA, UK, India, Belgium, Sweden, and Nigeria, demonstrating the global reach of these products. This prominence may reflect both the scale of production and the larger number of studies conducted in Pakistan. The Philippines also plays a notable role as an exporter, with products shipped to countries such as the USA, Indonesia, Belgium, and Palau. Pakistan and Mexico additionally show substantial evidence of domestically manufactured products being sold within their own markets.

The highest-mercury product manufactured in Pakistan (81,600 ppm) was purchased in the Philippines, highlighting opportunities for cross-country regulatory collaboration and coordinated bans. Although data from Cambodia are limited, available findings indicate the presence of high-mercury products, all purchased in the USA. Products purchased in Cambodia were typically manufactured in Thailand, Vietnam, and China; however, the small sample size limits the ability to draw firm conclusions and may not accurately reflect broader market conditions.

In Latin America and the Caribbean (LAC), Mexico is recorded as producing the product with the highest mercury concentration overall (210,000 ppm), which was purchased in the USA. Antigua and Barbuda stands out for sourcing products from the most diverse set of countries, despite being the only country in the dataset with no evidence of domestic SLP manufacturing—likely reflecting its small market size and limited research coverage. Products purchased in Antigua and Barbuda originated from a wide range of manufacturers, including Côte d'Ivoire, EU member states, France, Italy, India, Indonesia, the USA, and the UK.

Country Specific

Target countries have undertaken various initiatives to address the presence and risks of mercury-added skin-lightening products (SLPs).

PHILIPPINES

In the **Philippines**, despite a regional ban under ASEAN, mercury-containing cosmetics remain prevalent. The Philippines FDA publishes advisories^[40]⁴⁰ to consumers especially concerning SLPs. The government, in partnership with civil society organizations such as EcoWaste Coalition and Ban Toxics, conducts surveillance and enforcement activities funded through the Field Regulatory Enforcement Office. These efforts include market inspections, test-buys, and legal actions, with reports confirming mercury-containing cosmetics as the most common violations. BAN Toxics together with EEB/ZMWG organized the workshop titled “Navigating the Mercury Challenge in Skin-Lightening Creams in the Philippines” held on March 3, 2025. The workshop gathered government agencies relevant to regulating mercury-containing SLPs and provided a venue for discussing potential work synergies among the Department of Environment and Natural Resources, the Food and Drug Administration, and the Department of Trade and Industry. The workshop also provided opportunities for participants to learn more about regulations on online sales that are effective in countries outside of ASEAN.

The testing capacity of the Philippines FDA faces significant gaps. Additionally, monitoring and market surveillance have been especially challenging with the rise of online commerce and cross-border transactions. In terms of testing for mercury content, in the **Philippines**, testing has been conducted mainly from NGOS, such as Ban Toxics with EEB/ZMWG as well as EcoWaste Coalition resulting in the publication of FDA Advisories, but unfortunately efforts have not been sustained over time.

PAKISTAN

Mercury-added skin-lightening products (Hg/SLPs) were identified as a national concern under Pakistan’s Minamata Initial Assessment (MIA) Project (2019), led by the Ministry of Climate Change and Environmental Coordination (MoCC&EC). The MIA confirmed that Hg/SLPs were manufactured domestically and widely used in both rural and urban areas by men and women^[41]⁴¹. Follow-up activities included a national product testing study, nationwide awareness and training workshops, and stakeholder consultations, leading to commitments to develop regulatory frameworks, strengthen manufacturer oversight, and engage the Pakistan Standards and Quality Control Authority (PSQCA)^[42]⁴². Worldwide, it is estimated that 66 million Hg/SLPs are manufactured each year containing over 110 metric tons of mercury compounds^[43]⁴³. This estimate is derived from sales projections from only one major Pakistani manufacturer, although research and reports indicate that there are several major manufacturers of Hg/SLPs in the country^[44]⁴⁴. In 2025, sales of all cosmetics in Pakistan amounted to US\$783 million^[45]⁴⁵.

Extensive testing has documented dangerously high mercury levels in SLPs. Analysis of 59 samples using HGASS and ICP-OES found mercury concentrations ranging from 0.74 ppm to 44,292 ppm, with only three products

meeting the Minamata Convention limit of 1 ppm^[46]⁴⁶. ZMWG database records (2017–2023) show that 179 of 208 Pakistan-manufactured products exceeded 1 ppm^[47]⁴⁷. A ZMWG investigation published in *Zero Out Toxic Production* (October 2025) found 35 of 37 tested products contained high mercury levels; all were manufactured in Pakistan and sold through multiple channels, including online platforms (e.g., Daraz), official brand e-shops, social media (Facebook), and local markets^[48]⁴⁸.

Health impacts are evident. Surveys conducted by the Sustainable Development Policy Institute (SDPI) among dermatologists in 2016 and 2023 reported that nearly 90% of patients were unaware of toxic ingredients in SLPs, while over 60% presented with facial skin damage^[49]⁴⁹. Additional awareness-raising and research activities were carried out under SDPI-led projects in 2024–2025, including workshops, medical student surveys, media outreach, and studies measuring mercury emissions from cosmetics in beauty salons^[50]⁵⁰.

Despite regulatory measures—such as restrictions on mercury imports since 2016, PSQCA cosmetic standards (PS 3228-2017) prohibiting the intentional addition of mercury, and public notices issued in 2019—enforcement has remained limited^[51]⁵¹^[52]⁵². In October 2025, the Competition Commission of Pakistan (CCP) launched an inquiry into companies suspected of using mercury in cosmetics, citing public health risks and unfair market practices^[53]⁵³. These findings underscore the scale of Hg/SLP production in Pakistan and the need for strengthened enforcement and market surveillance.

CAMBODIA

In Cambodia, the ASEAN Cosmetic Directive (ACD) already in place bans cosmetic products containing mercury, however, enforcement has experienced difficulties as mercury-added products continue to be available in the market (both online and in physical stores). Cambodia referenced an Act on Cosmetic Product Control that restricts or prohibits certain harmful substances to ensure consumer safety; however, the specific list of banned substances has not yet been developed. In 2009, the Ministry of Health implemented a registration system referred to as CamPORS, designed to regulate and validate the substances used in cosmetic products intended for importation and distribution. In addition to this, the Law on Consumer Protection in Cambodia establishes general business accountability for product safety and quality, while the Act on the Requirements of Cosmetic Distribution further specifies and reinforces these obligations for business distributing cosmetics in the Cambodian markets. Studies^[54]⁵⁴,^[55]⁵⁵ conducted in Cambodia on cosmetics, particularly skin-whitening creams, have extensively used various mercury analyzers such as Handheld X-Ray Fluorescence (XRF) Analyzer and Cold Vapor Atomic Absorption (CVAA) spectrophotometry to detect and quantify the levels of

mercury and consistently reported mercury levels exceeding the 1 ppm limit set by the ASEAN guidelines on cosmetic products and addressed by the Minamata Convention on Mercury.

ANTIGUA and BARBUDA

In Antigua and Barbuda during the MIA, sixteen brands of creams were purchased and analyzed; two purchased within the region contained mercury more than 1ppm. 19000 ppm was the mercury recorded in one case. In work that followed, 98 brands were screened, from USA, Europe, Africa and the Caribbean. 10 creams were found with over 1 ppm and 3 of those had more than 1000 ppm.

In **Antigua and Barbuda**, draft regulations have been submitted to the Pharmacy Council to restrict high-mercury SLPs, with specific product bans under review by the Directorate of Pharmaceutical Services. They are set to impose a full ban on the importation of skin-lightening creams and other cosmetics containing mercury, with new regulations expected to be finalized by the end of 2025 and early 2026.

In terms of testing, 196 products were analyzed between 2021 and 2024, using X-ray fluorescence (XRF), with 14 exceeding 1000 mg/kg and 11 products exceeding 5000 mg/kg. The analysis included products available through online platforms. As a result, draft regulations were prepared, and customs authorities were notified.

Currently, Antigua and Barbuda has 338 products within their national database, however, only creams are tracked and not soaps, gels, etc. They have also engaged their pharmaceutical services to randomly submit samples for analysis in national labs on an ongoing basis.

MEXICO

Skin creams containing dangerous levels of mercury are a known public health issue in Mexico and are widely available in local markets and from individual sellers. In Mexico, cultural perceptions linking lighter skin tones to social and economic advantages continue to drive demand for SLPs. Studies by El Colegio de México and INEGI reveal persistent colorism in education, employment and social treatment, with lighter skin associated with higher education levels and better job prospects. Over half of surveyed youth believe lighter skin results in more favorable treatment, reflecting deep rooted beauty standards and social inequities that sustain SLP use despite existing regulatory prohibitions.

No specific national testing campaigns have been officially reported; however, the Zero Mercury Working Group identified mercury in a locally manufactured cream sold in the country, underscoring the persistence of mercury-added SLPs despite regulatory restrictions. Mexican made creams containing mercury can be found on the US FDA's list.^[56] The state of California has tested skin lightening creams and has identified creams manufactured in Mexico, which contain mercury, published on their website^[57]. Mercury poisoning was associated to use of a Mexican cream, in 2020^[58],^[59]. In June

2024, a family from West Texas was exposed to mercury through a skin cream product purchased in Mexico.^[60]⁶⁰

Mercury and its compounds are prohibited in the manufacture of cosmetic products under the “Agreement Determining Prohibited and Restricted Substances in the Manufacture of Perfumery and Beauty Products”, published in the Official Gazette of the Federation in 2010. Exceptions are limited to specific preservatives, such as phenylmercury salts and thimerosal, permitted only in eye makeup and removers at concentrations not exceeding 0.007% mercury. The Federal Commission for the Protection against Sanitary Risks (COFEPRIS) enforces this regulation through sanitary surveillance and a Health Alert System that issues technical risk communications when hazardous products are identified nationally or internationally. In September 2025, Mexico’s health authority, the COFEPRIS, issued a public risk alert^[61]⁶¹ referencing to the ZMWG analysis of SLP products, confirming that La Tía Mana Cleansing and Healing Cream, manufactured in Mexico, contains mercury at a concentration of 5,432 ppm. The authority warned that the product’s manufacture and distribution violate Mexican health regulations, which strictly prohibit cosmetic products containing mercury due to their serious risks to public health.

Addressing mercury in cosmetics is consistent with national environmental and health priorities, as Programa Sectorial de Medio Ambiente y Recursos Naturales 2025–2030 (PROMARNAT)^[62]⁶² prioritizes integrating pollution prevention and control to protect the health of the population, ecosystems, and productive systems, while the Programa Sectorial de Salud 2025–2030^[63]⁶³ emphasizes disease prevention, health promotion, and regulatory action to reduce population exposure to environmental and chemical health risks. Moreover, PROMARNAT 2025–2030 identifies Indigenous and Afro-Mexican communities as groups disproportionately affected by pollution and chemical exposure. While official health alerts do not disaggregate cosmetic use by ethnicity, the prevention of mercury exposure through consumer products aligns with national commitments to protect vulnerable populations from environmental health risks.

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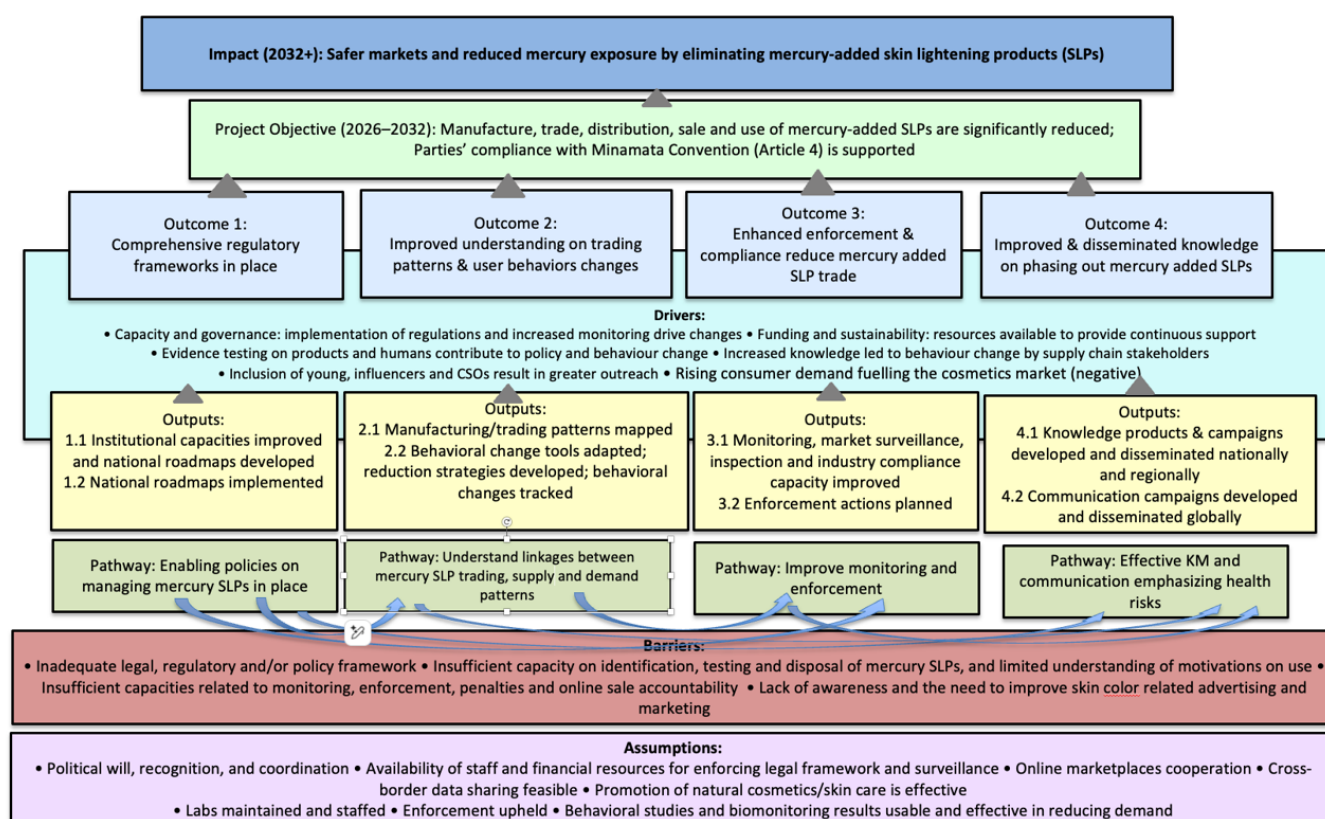
B. PROJECT DESCRIPTION

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 SLPs. 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 barriers through four independent but interlinked components and their respective outcomes and outputs. More information is detailed in the Theory of Change 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 4.



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, online sale, 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; develop demand reduction strategies
3. **ENFORCEMENT and CONSUMER SAFETY:** Strengthen the monitoring, control, and enforcement of the ban on mercury-added SLPs across manufacturing, trade, and sales channels—both in physical stores and online. Establish systems that enable industries to adopt self-regulation and internal compliance measures to support long-term consumer safety.
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 and youth considerations

The expected intermediate state of the project is the reduction or phase out of mercury-added 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-added 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 is among the key assumptions to reach long term project objective.

ALTERNATIVE SCENARIO

This section provides a narrative overview of the independent yet interlinked components and their respective outputs. The identification of barriers and project description stems are informed by consultations with technical experts, private sector companies involved in the SLP industry and the Ministries of Environment and Health. Insights from a comparable initiative (MSP GEFID 10810) have also shaped the project approach. Deliverables from project 10810 will be used extensively in the proposed project, with some outputs further refined where appropriate. Additionally, a Stakeholder Engagement Plan, a Gender Analysis and Action Plan and other relevant documents have been developed and will inform the 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 a regulatory depository and a model regulatory toolkit (currently being developed under MSP GEF ID 10810) to support the strengthening and/or development of national legal and regulatory frameworks aimed at banning the manufacture, import, export, distribution, and sale of mercury-added SLPs. In addition, clear labeling requirements will be mandated, and penalties for non-compliance will be established to deter repeat offenders. Stronger measures will also be introduced to address the informal and cottage industries involved in the manufacture of mercury-added SLPs, including the incorporation of international licensing requirements. Both regulatory and voluntary approaches will be explored to address

online sales of these products. Regulatory toolkit, including model legislation, developed under MSP GEF ID 10810, will be introduced, utilized, and findings from the supply chain study conducted under the same MSP will be considered to better identify and engage relevant stakeholders.

Furthermore, this component will focus on establishing pathways for cross-sectoral, inter-ministerial, and inter-regional collaboration related to regulatory requirements and mandates for mercury-added SLPs in the Asian and LAC contexts. This will include continued engagement with regional institutions such as ASEAN and CARICOM, which are well positioned to promote national and regional policy coherence and regulatory harmonization.

The successful delivery of this component assumes strong political will and sustained commitment from national governments to prioritize regulatory reform related to mercury added SLPs, as well as effective coordination across ministries and regulatory bodies. Capacity and resource needs (financial, infrastructural and human capital) of relevant Ministries will be analyzed. Key risks include lengthy legislative and regulatory processes that may exceed the project timeframe, limited capacity to regulate informal and cottage industries, and uneven adoption of voluntary or hybrid approaches for online sales, particularly where platform engagement is weak. There is also risk of regulatory fragmentation across regions, which could undermine harmonization efforts. These risks will be mitigated through early engagement with policymakers, phased and adaptive regulatory approaches, technical support using the model regulatory toolkit, and continuous collaboration with regional institutions. The project further assumes that tools and evidence generated under project 10810 can be effectively adapted to national context and institutionalized to ensure long-term sustainability beyond the project duration.

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

This output aims to strengthen institutional capacities to reduce the manufacture, import, export, distribution and sales of mercury-added SLPs, in line with and complementing the requirements of the Minamata Convention. To achieve this, technical support will be provided to target countries for developing or strengthening a national roadmap covering legal frameworks and for introducing effective approaches to engage and sensitize decision-makers. In addition, local, national, and regional stakeholders—including public health and environmental regulators, policymakers, manufacturers, online marketplaces, distributors, community leaders, CSOs, influencers, and youth—will be convened with gender and youth considerations to establish coordination mechanisms that support legal framework formulation and advocacy. A thorough assessment, including review of the country's Minamata Initial Assessments (MIAs) and other related projects in country, will be conducted and recommendations made to identify institutional barriers, including gaps in public agency capacities, resource constraints, and the economic dependence of formal and informal sectors involved in the manufacture and trade of mercury-added SLPs. Regulatory and voluntary approaches will also be considered in view of tackling online sales. The tools developed under the MSP GEF ID 10810 by EEB/ZMWG will be considered and used. Finally, efforts will be made to promote national and regional policy coherence and harmonization to support the phase-out of these harmful products.

Activity 1.1.1. Establish national and regional coordinating mechanisms comprised of relevant government, non-government and civil society organizations who review and oversee project activities to ensure national representation

Activity 1.1.2. Assess legislative and institutional gaps, needs and recommendations for enhanced regulatory framework related to elimination of mercury-added SLPs (manufacture, sale, import and export)

Activity 1.1.3. Convene various meetings engaging various stakeholders in each country including but not limited to manufacturers, online marketplaces, traders/distributors, cultural brokers, community leaders, users, especially women's consumer groups, influencers, youth to support formulation and advocacy of the legal framework with gender considerations

Activity 1.1.4. Develop a comprehensive gender responsive national roadmap / national action plan, including financial and resource requirement, for mercury-added SLPs in each target country

Activity 1.1.5. Promote national and regional policy coherence and harmonization to phase out mercury-added SLPs

Output 1.2: Gender responsive national roadmaps implemented with national authorities to discontinue formal and informal manufacture and sale of mercury-added SLPs

Output 1.2 focuses on supporting national authorities in implementing their respective comprehensive roadmaps/national action plans to discontinue the formal and informal manufacture and sale of mercury-added SLPs. This includes collaboration with governments in key manufacturing countries to phasing out production. Efforts will also involve working with manufacturers and industry associations to implement clear labeling guidelines that ensure full ingredient disclosure. Additionally, licensing and registration procedures will be clearly communicated to relevant stakeholders, while measures will be introduced to discourage or ban all forms of mercury-added SLP production and sales (including online sales). To support affected communities, options for alternative livelihoods—such as the production of natural cosmetics—will also be assessed and promoted.

Activity 1.2.1. Collaborate with the governments in countries where there is major manufacturing of mercury-added SLPs (e.g. Mexico and Pakistan) to develop a process to discontinue production, including analysis and definition of resources required for implementing the process and strategies for covering these aspects

Activity 1.2.2. Collaborate with the governments, manufacturers and industry associations to design (potentially implement if resources and time are feasible) labeling guidelines to ensure full disclosure of ingredients in SLPs

Activity 1.2.3. Ensure licensing and registration procedures are clearly communicated to targeted groups

Activity 1.2.4. Discourage/enforce the ban of formal/cottage/informal manufacturing and sale/online sale of mercury-added SLPs (to be linked with activities under Component 3)

Activity 1.2.5 Develop livelihood restoration plans in each country for affected communities and businesses

Component 2. Enhancing supply chain management and controls

Outcome 2: Improved understanding on mercury-added SLPs trading patterns and user behaviors changes

Component 2 will generate robust, actionable evidence on the supply chains and consumption patterns of mercury-added skin-lightening products (SLPs), enable more effective policy and behavior-change interventions. The project will improve understanding of the full SLP supply chain—across both formal and informal sectors—including manufacturing sources, trade flows, distribution channels, and retail practices, as well as the prevalence and patterns of use among different demographic groups and communities in each target country. Building on the results of the MSP (GEF ID 10810), the project will strengthen the ability of national authorities and partners to identify and monitor manufacturing and trading patterns of mercury-added

SLPs entering and exiting target countries. This will be achieved through enhanced product identification, sampling, and testing capacities for both online and in-store sales, including methods to track product origin, labeling, and safety. Verified findings will be systematically compiled and contributed to a global database (developed under the MSP), supporting cross-country analysis and coordinated international responses.

At the demand level, the project will deepen understanding of the behavioral drivers that sustain SLP use and will measure changes in user behavior over time. Population-level studies will assess self-reported awareness, attitudes, and practices related to skin-lightening, providing evidence of behavioral change and the effectiveness of project interventions. Qualitative research methods—including focus group discussions and key informant interviews—will be conducted to capture nuanced insights into motivations, social norms, gender dynamics, and day-to-day usage patterns.

The behavioral research approach initiated under the MSP will be further strengthened and expanded, building on ongoing efforts in Gabon, Jamaica, and Sri Lanka (GEF ID 10810). Validated tools and methodologies will be peer-reviewed and made available globally, enabling replication and adaptation by other countries. Evidence generated under this outcome will directly inform targeted communication strategies, demand-reduction measures, and policy responses aimed at addressing the underlying drivers of mercury-added SLP use.

The successful implementation of this component assumes the continued willingness of consumers, retailers, manufacturers, and informal-sector actors to participate in surveys, interviews, and product sampling activities, as well as sustained cooperation from national authorities in sharing data and facilitating access. Potential risks include limited access to informal or illicit supply chains, underreporting or social desirability bias in self-reported consumer behavior, and the rapid adaptation of suppliers to evade detection, particularly in online marketplaces. These risks will be mitigated using mixed research methods, triangulation of data sources, anonymized data collection approaches, and close collaboration with enforcement agencies, customs authorities, and civil society partners.

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

Output 2.1 aims to enhance understanding of the manufacturing and trading patterns of mercury-added skin-lightening products (SLPs) through improved identification and testing of products available both in physical stores and online. This includes mapping the supply chain of mercury-added SLPs in each country, covering both formal and informal markets. Standardized training will be provided to support development of country-specific sampling protocols, followed by the collection and analysis of suspected mercury-containing products, with reference to results from existing global databases. The output also focuses on assessing and strengthening national and regional analytical capacities, including laboratory infrastructure, through targeted training and technical support. Pilot demonstrations will be implemented in selected laboratories in each country, involving the procurement of advanced analytical equipment and the development of long-term maintenance and procurement plans. Additionally, national, regional, and global trends in the manufacture and trade of mercury-added SLPs will be analyzed, with gender considerations integrated throughout the process.

Activity 2.1.1. Develop and provide training on a standardized country specific sampling protocol (based on the existing sampling protocol developed under project 10810) and carry out sampling and analysis exercises (desktop assessments and actual sampling of both formal and informal sources) of suspected mercury-added SLPs available in local markets (referencing and/or adding to existing global database)

Activity 2.1.2. Assess national/regional analytical capacity (e.g. infrastructure and economic/cost implications) and provide relevant trainings

Activity 2.1.3. Select 1-2 laboratories (based on existing capacity and interests) 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 (e.g. five X-ray fluorescence (XRFs) and one direct mercury analyzer (DMA), subject to finalization during the inception phase)

Activity 2.1.4. Analyze national, regional and global trend on manufacturing and trading patterns to facilitate elimination of mercury-added SLPs

Output 2.2: Behavioral research tools adapted at national level targeting SLP users based to better understand motivations and behavior changes

Output 2.2 focuses on documenting behavioral change among users of SLPs by gaining a deeper understanding of their motivations, beliefs, and practices. Country- and context-specific tools will be developed and used to map user journeys, identifying key decision-making points and knowledge, attitudes, and practices related to SLP use, with strong consideration for gender dynamics and following actions described as part of the gender mainstream plan (Appendix 3). These tools will also be made available for use by the global community. The output includes conducting both quantitative and qualitative research—such as focus group discussions and key informant interviews—to better understand user needs, frequency of use, application methods, and exposure patterns. National and regional usage trends will be analyzed to uncover cultural drivers and motivations behind SLP use. Insights gained will inform the design and implementation of targeted behavior change interventions, co-created with users and key audiences to ensure relevance and impact.

Minamata COP6 took a recent decision on cosmetics. Under this decision, WHO, in cooperation with the GEF ID 10810 partners and the GMP, is invited to prepare an illustrative national public health system-wide strategy, focused on reduction measures for mercury added cosmetics. It is noted that skin lightening products that may not contain mercury are also to be part of this strategy -in an effort to tackle colorism. As relevant given the timing, the project will build on the expected outcomes of this decision on cosmetics to develop demand reduction strategies.

Activity 2.2.1. Continue to develop country or context specific tools and map gendered user journeys through the use of SLPs to prioritize action and decision making (knowledge, attitude and practices) using existing tools developed under project 10810

Activity 2.2.2. 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 ensuring mapping includes women from rural and urban contexts

Activity 2.2.3. Analyze national and regional usage patterns, considering main drivers for usage, cultural differences and use the insights for development of a demand reduction strategy (engage users and target audience in co-design and co-implementation) with gender considerations

Activity 2.2.4. Conduct quantitative studies to measure self-reported changes at population level or for target groups

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 on mercury-added SLPs across manufacturing, trade, distribution, and sales, a comprehensive approach is essential. This approach must include robust surveillance, inspections, and clear penalties for non-compliance.

Component 3 aims to enhance national capacities to enforce regulations on mercury-added SLPs, ensuring consumer safety. Research on supply chains and online sales conducted under the MSP will serve as a foundation for ongoing efforts to phase out these products. The project will collaborate with customs, trade and market surveillance authorities to curb the distribution of mercury-added SLPs in both physical and online marketplaces. Furthermore, the project will engage with major online platforms at national, regional, and global levels to promote voluntary product safety pledges and strengthen accountability and liability for online sales. It will also explore the establishment of self-regulatory systems in target countries, enabling industries involved in the manufacture and sale of mercury-added SLPs to adopt internal compliance mechanisms. Regulatory, voluntary but also hybrid approaches will also be considered in view of tackling online sales. The tools developed under the MSP GEF ID 10810 by EEB/ZMWG related to engagement with online sales will be considered and used. Governments will play a key role in providing oversight through active engagement and regular reporting. Finally, the project will work with national enforcement authorities—including legal professionals, judges, and regulatory bodies—to ensure that legal frameworks governing the manufacture, import, export, and distribution of mercury-added SLPs are fully implemented. Clear penalties will be established and enforced in cases of non-compliance.

The effectiveness of this component assumes sustained political commitment, adequate resourcing of enforcement agencies, and continued cooperation among customs, market surveillance authorities, and online platforms at national and regional levels. The project will aim to ensure that the availability of the required capacities and infrastructures will be made available. Key risks include fragmented institutional mandates, jurisdictional challenges related to cross-border and online sales, and potential resistance from informal or non-compliant market actors. There is also a risk that illicit suppliers may shift distribution channels or rebrand products to evade detection. These risks will be mitigated through inter-agency coordination mechanisms, capacity-building for enforcement and judicial actors, the use of intelligence-led inspections informed by supply chain research, and engagement with online platforms to strengthen voluntary compliance and rapid product removal. The project further assumes that tools and systems developed under MSP GEF ID 10810 can be effectively adapted and institutionalized within national enforcement frameworks to ensure sustainability beyond the project duration.

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

Output 3.1 aims to strengthen national capacities for regular monitoring, inspection, and enforcement related to mercury-added SLPs. This includes incentivizing and training customs, trade and market surveillance officials to detect and address the import and sale of such products. The cost implications and long-term sustainability of regulatory surveillance and compliance measures will be assessed to inform national planning. Clear delineation of roles and responsibilities among relevant national authorities will ensure coordinated monitoring and control. To support effective enforcement, handheld XRF analyzers will be procured and training provided for their use and maintenance. Monitoring efforts will extend to both online and in-store sales, with a focus on identifying non-compliant products. In addition, reforms will be promoted to strengthen accountability of online platforms, including requirements for them to remove mercury-added SLPs which appear on detention lists and mandate testing of products sold by previously non-compliant vendors. Assistance in creating national detention lists and health advisory/alert systems will also be provided in selected countries to support enforcement actions and inform the public of health risks.

Activity 3.1.1. Incentivize and provide appropriate training for custom, trade and regulatory (e.g. inspectors, enforcers of National Regulatory Authorities) officials (gender disaggregated) to ensure clear understanding of roles and responsibilities in each country (use and adapt existing training materials from project 10810)

Activity 3.1.2. Procure handheld XRF analyzers for selected countries and conduct training in maintenance and use for relevant stakeholders

Activity 3.1.3. Introduce and develop monitoring protocols (e.g. prohibited product lists, detention lists, alert systems) (for both online and in store) to be used by national stakeholders such as customs, bureau of standards, consumer affairs authorities

Activity 3.1.4 Engage with national, regional and global online platforms that promote/sell mercury-added SLPs to promote voluntary or hybrid compliance mechanisms

Activity 3.1.5 Establish industry self-regulation systems (including online platforms) in selected countries to enhance internal compliance frameworks and ensure sustained product safety over the long term

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

Output 3.2 focuses on ensuring effective enforcement actions against non-compliant actors involved in the manufacture, import, export, and sale of mercury-added SLPs. This includes the sensitization and/or introduction of clear and enforceable penalties for violations related to the production and trade of mercury-containing SLPs. The output also promotes stronger collaboration at regional and global levels—particularly through regional platforms like ASEAN and CARICOM—to support harmonized monitoring, market surveillance, inspection, and border enforcement efforts. Additionally, countries will be encouraged to actively process cases of non-compliance and apply penalties to deter illegal activities and reinforce the regulatory framework.

Activity 3.2.1. Introduce clear penalties and encourage processing for non-compliance in the manufacture, trade and distribution of mercury-added SLPs

Activity 3.2.2. Strengthen collaboration on regional and global harmonization related to monitoring, inspection, border enforcement (for both online and in store) (with ASEAN Cosmetics Committee in Asia and CROSQ, under CARICOM in LAC)

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 communicate health risk associated with harmful chemicals.

Component 4 will drive measurable behavior change among policymakers, regulators, health professionals, and other key stakeholders by increasing the adoption of effective practices, policies, and collaborative approaches to phase out mercury-added SLPs. Knowledge and lessons generated through the project will be

translated into actionable guidance and shared with regional and global stakeholders through the UNEP Global Mercury Partnership (GMP), relevant regional and global platforms, and ongoing initiatives, including the FSP in Africa (ID 11877). This will strengthen south–south cooperation and peer-to-peer learning, enabling stakeholders to apply proven approaches to regulatory enforcement, risk communication, and market surveillance.

Behavioral change will be evidenced by increased integration of project knowledge into national and regional strategies, policies, and enforcement actions addressing mercury-added SLPs, as well as by improved coordination and information exchange among Parties to the Minamata Convention. Information dissemination through the UNEP GMP website, regional and country offices, and international health, human rights, and chemicals-related forums will be monitored through usage analytics, participation metrics, and documented uptake of guidance and tools.

Regional and global experience-sharing forums will support Parties facing similar challenges by facilitating commitment to concrete follow-up actions, such as policy revisions, strengthened intersectoral collaboration, or replication of successful interventions. Progress will be measured through post-forum action plans, follow-up surveys, and reporting on implementation of shared practices. A dedicated Knowledge Management expert will ensure systematic capture, synthesis, and dissemination of lessons learned and will track knowledge uptake and behavioral change indicators throughout project implementation.

The success of this component assumes sustained engagement from diverse stakeholder groups, including policymakers, regulators, health professionals, civil society organizations, and community leaders, as well as their willingness to integrate project knowledge into policy and practice. Key risks include deeply entrenched social norms and beauty standards that may limit behavior change, misinformation or competing narratives promoted through informal networks and online platforms, and uneven capacity among institutions to absorb and apply shared knowledge. There is also a risk that increased awareness may not immediately translate into reduced demand if safe and culturally acceptable alternatives are not accessible. These risks will be mitigated through culturally sensitive, gender-responsive communication strategies, the use of trusted community intermediaries, continuous stakeholder engagement, and the reinforcement of awareness-raising efforts with regulatory and market-based interventions under other project components. The project further assumes that regional and global platforms, including the UNEP GMP, will remain active and effective channels for sustained knowledge exchange and peer learning throughout and beyond the project period.

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

Output 4.1 focuses on the development and dissemination of knowledge products and communication campaigns that incorporate gender-specific information at both national and regional levels. A comprehensive communications and knowledge management plan will be created, targeting diverse stakeholders and addressing gender and youth considerations. Findings from gender analyses and action plans will inform the design of knowledge products and outreach strategies. Insights and best practices from previous initiatives will be compiled to enhance current efforts, with systems established to document lessons learned—particularly those related to gender responsiveness—throughout the project lifecycle. Public health campaigns and community-based interventions using various media formats (e.g., video, radio, blogs, social media) will be implemented to raise awareness about the dangers of mercury-added SLPs and address issues like colorism. Specific outreach will target small business owners, such as salons and retailers using or selling SLPs. Influencers will be engaged at national and regional levels to amplify the project's impact, and regional experience-sharing meetings will be organized in Asia and Latin America and the Caribbean (LAC) to foster cross-country learning and collaboration.

Activity 4.1.1. Develop processes for capturing, assessing and documenting information, lessons learnt and best practices at the national and regional levels with an additional focus on gender aspects

Activity 4.1.2. Develop multi-media public health campaigns and community-based interventions to raise awareness and combat colorism at national and regional levels (e.g. video, radio, blogs and other social media channels including engagement with national/regional influencers)

Activity 4.1.3. Conduct specific outreach to small and medium scale business owners (e.g. salons and other businesses that sale or use SLPs) particularly targeting women-owned businesses

Activity 4.1.4. Organize regional experience exchange meetings across target countries and specifically in Asia and LAC

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

Output 4.2 aims to develop and globally disseminate knowledge products and communication campaigns that incorporate gender-specific information and address the needs of youth and marginalized communities. This includes analyzing and curating lessons learned to highlight gender-responsive practices and community-specific insights. The project webpage—hosted by UNEP's Global Mercury Partnership—will be maintained as a central hub for information sharing and linked to other relevant resources and platforms. A global stakeholder group will be engaged to facilitate ongoing knowledge exchange. Influencers will be engaged at the global level to amplify outreach and help combat harmful beauty standards such as colorism. The global SLP database will be continuously updated and maintained beyond the project's end. Additionally, global communication campaigns and awareness workshops will be organized for both project and non-project countries, targeting a wide range of stakeholders including consumers, policy makers, private sector, public health professionals, youth leaders, and community workers, with dedicated sessions for gender, youth, and marginalized groups. Findings and progress will be shared at major international events, such as Conferences of the Parties (COPs) and mercury-related scientific conferences. Global experience-sharing meetings will also be coordinated, including collaboration with Africa under a parallel initiative (Project ID 11877), to strengthen South-South cooperation and broaden global impact.

Specifically, a Global Forum is planned under the project and central to the project's success and sustainability, serving as the primary platform for final dissemination, global exchange, and collective momentum-building. It will bring together efforts across all project components, creating a structured space for sharing results, lessons learned, and innovative practices while strengthening long-term collaboration. The Forum will also function as a key bridge between project outcomes and global agendas, reinforcing alignment with the Global Framework on Chemicals, the Minamata Convention, and broader health and human rights commitments, as well as linkages with other GEF-funded initiatives, for example on the textile sector.

The Forum is envisioned to leverage and amplify achievements under current project as well as Project 11877 in the Africa region, significantly expanding impact through South–South cooperation and peer learning. Expected participation includes representatives from the 18 countries covered under the MSP and FSP on SLPs, as well as up to 10 additional countries that have identified mercury in cosmetics as a national priority. This inclusive approach will ensure broad geographic reach and relevance while fostering practical, context-specific solutions. Engagement will extend beyond governments to include civil society organizations, academia, co-financing partners, ambassadors, influencers, artists, and community leaders. All in all, bringing the number to approximately 100- 120 attendees. This diverse participation is critical to accelerating learning, strengthening advocacy, and sustaining behavior change. By jointly showcasing evidence, innovative solutions, and successful regulatory and community-based interventions, the Global Forum will help embed project knowledge into policy, practice, and public discourse, ensuring that actions to phase out mercury added SLPs continue well beyond the project lifecycle and contribute to addressing linked chemical risks across the sector.

Activity 4.2.1. Analyze, curate and share lessons learnt (via e.g. project stakeholder group, global knowledge hub to ensure that gender, youth and marginalized communities' specific insights and gender responsive practices are highlighted

Activity 4.2.2. Organize a global forum through continuous engagement with global influencers and exchange with project 11877 in Africa region to increase impact of the project and combat colorism

Activity 4.2.3. Develop, host and maintain the existing global SLP database and knowledge hub which will continue to expand past project end date

Activity 4.2.4. Curate a unified visual identity and messaging toolkit, organize global communication campaigns and awareness workshops at key events (e.g. COPs, international conferences), targeting diverse stakeholders—e.g. consumers, policy makers, private sector, public health professionals, community health workers, community leaders, cultural brokers, youth leaders - including youth, gender, and marginalized groups—and maintain ongoing knowledge exchange and South-South cooperation with related initiatives.

Close coordination will be ensured with existing initiatives and partners of the GMP. Further consultations will be conducted during the inception phase.

INNOVATION AND SCALING TOWARDS TRANSFORMATION

The project will build on the experiences and lesson learned through the MSP SLP project (ID 10810, 2022-2025) and FSP SLP project (ID 11877, 2026-2032) and replicate best practices globally in both manufacturing and non-manufacturing countries to phase out mercury-added SLPs from physical and online sales. International insights, best practices and proven strategies will be gathered and adapted to the target countries' context during the inception 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 SLPs in line with the Minamata Convention and strengthen laboratory capacities in testing and monitoring the SLPs 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 training can directly contribute and synergize with the regional mercury monitoring hubs/laboratories that are already being set-up through the SIP projects (e.g. Antigua and Barbuda).

The Caribbean Region Mercury Monitoring Network (CRMMN) was established under the SIP project, "Facilitating capacity-building with technical assistance and technology transfer for managing mercury in the Caribbean Region" and under the leadership of the government of Antigua and Barbuda aims to establish an integrated network of laboratories to assist in the assessment of mercury in the environment and the food that people depend on, and to guide policies to address mercury risks .

Furthermore, the interventions toward monitoring and control of SLPs 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 inception 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.

Project 11877 on elimination of mercury-added SLPs in Africa is currently in its PPG phase. The plan is to align the FSP and MSP so the two projects will start implementation around the same time (summer of 2026) 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 and develop demand reduction strategies. 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.

EXIT STRATEGY AND SUSTAINABILITY

The project's exit strategy and sustainability plan are anchored in institutionalization, capacity transfer, and regional ownership, ensuring that the impact achieved during the project is maintained and scaled beyond its lifecycle. Across all four components, sustainability will be achieved by systematically embedding regulatory tools, enforcement mechanisms, behavioral research methodologies, and knowledge products within national institutions, legal frameworks, and existing regional and global platforms, including the Minamata Convention framework and the UNEP Global Mercury Partnership. Regulatory depositories, model toolkits, surveillance systems, and laboratory testing capacities developed under the project will be formally adopted by national authorities and integrated into routine regulatory, customs, and market surveillance operations, ensuring that monitoring and enforcement of mercury-added SLP bans become part of standard institutional practice.

Capacity-building will be central to sustainability, with a strong emphasis on training-of-trainers approaches, mentorship programs, and knowledge transfer to national and regional stakeholders. This will empower government officials, customs officers, enforcement agencies, health professionals, and civil society actors to continue monitoring, enforcement, and behavior-change initiatives using domestic resources after project closure. Behavioral research methodologies and validated tools developed under the MSP will be institutionalized within local universities, research institutes, and public health programs, allowing ongoing assessment of consumer behaviors, demand drivers, and market trends.

Regional collaboration will further reinforce sustainability by strengthening policy coherence and harmonization across borders. Engagement with regional bodies such as ASEAN in Asia and CARICOM in the LAC region will promote south-south cooperation, peer learning, and the replication of best practices, while facilitating cross-border enforcement and information sharing on mercury-added SLPs. Partnerships with civil society organizations, academia, and online platforms will maintain demand-reduction efforts, public awareness campaigns, and accountability mechanisms, ensuring that both formal and informal markets remain under scrutiny.

To ensure long-term impact, the project will also support the integration of MSP-developed tools and global data contributions into national decision-making processes. Verified supply chain data, monitoring reports, and evidence-based policy recommendations will continue to inform regulatory updates, enforcement strategies, and public health interventions, providing a solid foundation for sustained action. Recognizing that full regulatory reform and behavioral change may extend beyond the project duration, the exit strategy will adopt a phased and adaptive management approach. It will be continuously refined during project implementation to address emerging challenges, incorporate lessons learned, and adjust interventions to local contexts and evolving market dynamics.

By combining institutionalization, capacity transfer, stakeholder engagement, regional cooperation, and adaptive management, the project's exit strategy aims to ensure that the elimination of mercury-added SLPs in Asia and LAC is not only achieved during the project period but is maintained, scaled, and reinforced over the long term, leaving a lasting legacy of safer consumer products and healthier communities.

INSTITUTIONAL ARRANGEMENTS

The United Nations Environment Programme (UNEP) will act as the Implementing Agency (IA), while the Biodiversity Research Institute (BRI) will serve as the Executing Agency (EA) for the project. BRI is a U.S.-based non-profit organization renowned for its scientific excellence in environmental research, particularly in the fields of wildlife conservation, chemical contaminant analysis, and ecosystem health. With a strong commitment to applying rigorous science to real-world environmental challenges, BRI has developed extensive expertise in sampling, analyzing, and assessing the impacts of harmful substances—including mercury and other toxic chemicals—in various environmental matrices and consumer products.

BRI's selection as the EA is based not only on its deep technical knowledge and laboratory capacity for analyzing SLPs for mercury content but also on its proven track record of successful project management and collaboration. Their pivotal role in the implementation of the active MSP SLP project (GEF ID 10810) demonstrated their ability to coordinate multi-country research activities, engage with diverse stakeholders, and translate scientific findings into actionable policy recommendations. BRI's robust analytical capabilities are supported by state-of-the-art laboratories equipped to conduct precise mercury testing and product safety evaluations, enabling reliable monitoring of compliance with regulatory standards. In addition to its scientific strengths, BRI excels in stakeholder engagement and capacity-building, working closely with governmental agencies, non-governmental organizations, academic institutions, and communities to foster knowledge exchange and empower local actors. BRI's interdisciplinary team brings expertise in toxicology, environmental chemistry, epidemiology, and environmental policy, making it uniquely qualified to support the comprehensive approach needed to eliminate mercury-added SLPs. Their emphasis on using scientific evidence to inform decision-making aligns closely with the goals of this project, ensuring that regulatory and behavioral interventions are grounded in sound, up-to-date data. Overall, BRI's combination of technical expertise, operational experience, and commitment to advancing environmental health positions it as a highly capable Executing Agency, well-suited to lead this project toward the successful elimination of mercury-added SLPs in Asia and LAC.

The European Environment Bureau and Zero Mercury Working Group (EEB/ZMWG) as co-leads of the Mercury-added Products Area under the Global Mercury Partnership, in their own respective organizational capacity, will provide various types of targeted technical support for specific outputs and activities through service contracts to be managed by BRI.

The UNEP Global Mercury Partnership (GMP) will continue to play a pivotal role in the proposed project by providing guidance to the project, building on its previous involvement in past MSP initiatives. The GMP is a voluntary multi-stakeholder initiative convened by UNEP aimed at supporting the implementation of the Minamata Convention on Mercury. Its broad membership includes governments, inter-governmental organizations, non-governmental organizations, industry, and scientific communities, enabling it to foster wide-ranging collaboration and coordination on mercury reduction efforts worldwide. Within this project, the GMP's key contributions will focus on engaging global stakeholders to enhance dialogue, partnership, and coordinated action to eliminate mercury-added SLPs. Leveraging its extensive network and convening power, the GMP will facilitate knowledge exchange, promote best practices, and support the dissemination of project results to maximize impact globally across diverse regions, particularly in Asia and LAC and linking with the other SLP project in Africa (GEF ID 11877).

The EA will manage daily operations, ensuring project outcomes and outputs are achieved. Responsibilities include hiring staff and consultants, managing finances, and submitting quarterly and annual reports to the IA. The EA houses the Project Management Unit (PMU), which oversees daily activities and reporting. The PMU comprises a Global Project Manager, Communications Expert, Gender Expert, and other technical and operational staff, ensuring a gender balanced team composition.

A global Project Steering Committee (gPSC), 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 gPSC will be linked with other PSC to be formed under the FSP project covering the Africa region to enhance synergies. Implementation and coordination arrangements will be further developed during the inception phase. Strong inter-institutional coordination and communication will ensure consistent messaging and alignment of actions toward addressing mercury-added SLPs.

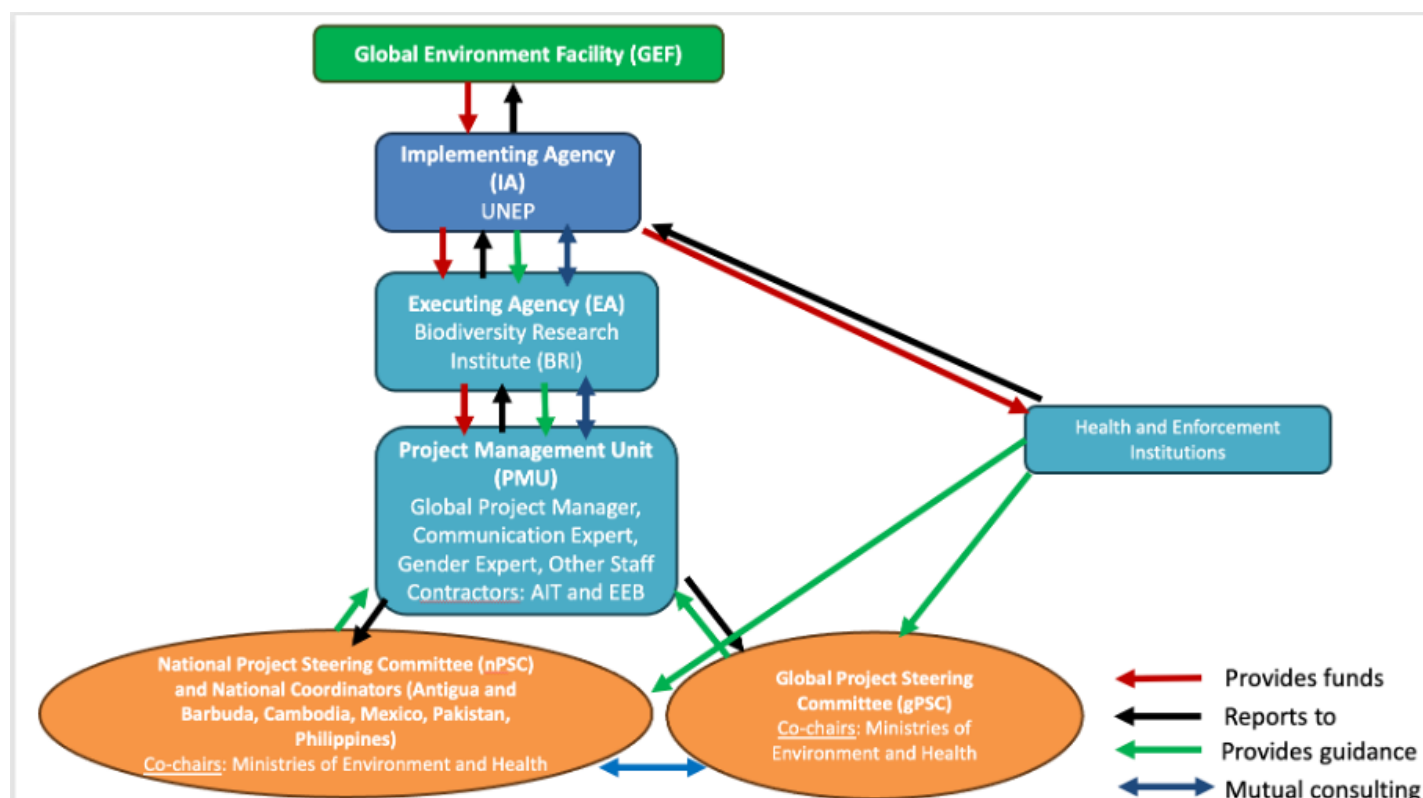


Figure 1. Implementation Arrangement

The gPSC 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?

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 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 SLPs 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-added SLPs. Moreover, engagement with national laboratories, standards bureau, trade and enforcement authorities are critical for comprehensive control of mercury-added 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.
- **Engaging online platforms:** Existing experiences have been studied, tools have been developed and currently implemented with Sri Lanka and hopefully shortly Gabon. Suspect Hg/SLPs and e-platforms have been identified; prohibited product lists developed and published; voluntary approaches developed and contact with platforms established towards further government/e-platforms agreements.
- **Recognizing challenges and engaging stakeholders involved in the informal side of the sector:** While formal manufacturing of SLPs 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 SLPs.
- **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 cosmetics brands, movie directors, photographers and social media influencers. 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. Synergies and knowledge sharing will be coordinated.

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.

ISLANDS Caribbean - two child projects under the ISLANDS Programme (ID 10279 and ID 10472) covering a total of 12 SIDS in the Caribbean region. The programme aims to support these countries to improve chemicals and waste management, including mercury. The four main objectives include: prevent future build-up of chemicals entering SIDS – by strengthening legislation and import regulations on products containing hazardous materials; safely manage and dispose of existing hazardous chemicals, products and materials – by raising awareness of the pathways of contamination and building capacity among key stakeholders to sustainably manage hazardous chemicals and waste; manage products entering SIDS throughout their lifecycle – from import oversight to final safe disposal, and build local, national and international public-private partnerships to facilitate this lifecycle approach; facilitate SIDS-SIDS learning and sharing of knowledge – by ensuring innovations and successes (or setbacks) in one SIDS can be picked up and inform activities in another. ISLANDS is supporting the Green Forum and six Communities of Practice to achieve this.

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 (POPs) 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 Africa, Asia, Pacific Islands, Latin America and the Caribbean. 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 sampling 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 partner organizations 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.

Zero Mercury Working Group – Mercury added skin lightening products campaign: since 2017, ZMWG has led a global sampling campaign to pressure national governments, engage the Minamata Convention, and unite its international NGO network. In each country, local NGO partners helped build capacity, raise awareness, and generate locally relevant results, while global reports contributed input to the Conference of the Parties(COPs). Since 2017, ZMWG and partners have purchased and tested over 1000 SLPs from over 20 countries, primarily sourced online from over 40 e-commerce platforms, revealing that over 50% exceeded 1ppm mercury, the former Minamata limit (now replaced by a zero-mercury standard from 2025). Screening was carried out at the ZMWG regional hubs/partners including with their own XRF, and lab tested at accredited labs. Alongside testing, ZMWG developed an extensive publicly accessible online database of non-compliant products, the largest available globally currently, shared findings with governments, and successfully pressured platforms like Amazon, eBay, Daraz, and Jumia to remove mercury-added creams from their listings. Eight major reports have documented these results, highlighting the ongoing challenges and contributing to the decisions to strengthen enforcement of the Minamata Convention ban. At the same time, over three developing country NGOs per year, since 2017 have been supported to assist their governments in implementation and enforcement of the mercury added cosmetics ban – developing capacity on the ground and feeding into the global work.

World Health Organization - WHO has country offices in all Asian and LAC countries which already established communication channels with governments for convening intersectoral meetings and workshops. WHO also has regional offices in Asia and LAC with established capacity for supporting implementing GEF projects in countries. An initiative to strengthen and implement a behavioral insights approach 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, poison center development and strengthening, pharmacovigilance, children's environmental health, food safety (mercury exposure through seafood), burden of disease, counterfeited 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. 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 prepared a report to COP-6 on challenges in preventing manufacture, import and export of mercury-added cosmetics. COP6, following an initiative from the African Region, building on this report as well as the Libreville Commitment :

- Encourages Parties to report any implementation challenges related to their obligations on curbing mercury-added cosmetics
- Requests the Global Mercury Partnership (GMP) to compile and disseminate information on the presence of mercury in these products.
- The Secretariat is invited to provide COP-7 with information on mechanisms that support enforcement and on methods for identifying mercury in cosmetics, as well as
- To collaborate with the World Customs Organization and INTERPOL to investigate sources of illegal mercury trade.
- The decision further enhanced the relations with the World Health Organisation (WHO); in cooperation with the partners and the GMP, WHO is invited to share lessons learned from its relevant ongoing projects and to prepare an illustrative national public health system-wide strategy, focused on reduction measures for mercury added cosmetics. It is noted that skin lightening products that may not contain mercury are also to be part of this strategy -in an effort to tackle colorism.

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 - advocating for an inclusive, fair, and toxic-free future for all.

Furthermore, through the Libreville Commitment , 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 inception phase.

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)
2.49	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)
2.49			

Indicator 9.3 Hydrochloroflurocarbons (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)
89.00			

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	4,330,000			
Male	620,000			
Total	4,950,000	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 2.49 tons of mercury will be reduced from circulation through project interventions. Based on previously tested samples, mercury is present in approximately 6% of skin-lightening products (SLPs) sold online and in stores in LAC and Asia. 30% of these products are expected to be removed from the market by the end of the project.

It is estimated that, on average, 3.5% of mercury compounds is used/added to SLPs, with 80% of that being pure mercury, and that SLP purchases per individual per year is approximately 300 grams. The total annual SLP sales in all five target countries is estimated at 4,946 tons.

$0.035 \times 0.8 = 0.028$, $0.028 \times 300 \text{ grams} = 8.4 \text{ grams per individual per year}$

$0.0084 \text{ kg Hg} \times 16.49 \text{ million users} \times 0.06 \text{ (percentage of products containing mercury)} \div 1000 = 8.31 \text{ tons}$

$8.31 \text{ tons} \times 30\% \text{ projected success rate of the project} = 2.49$

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

The usage rate is highly specific per country and varies by gender; therefore, these figures will be refined during the inception phase.

Indicator 9.6: SLP typically only contain about 3.5% mercury by weight, hence the total amount of contaminated product (the cream) is around 35 times more than the total amount of mercury. A survey-based methodology was used to estimate the minimum usage of mercury-added SLPs across the target countries. The calculation estimates the number of SLP users between ages 15 and 64 based on published literature, assuming each user purchases 300 grams of SLPs annually. As mentioned above, this yields an estimated total of 4,946 metric tons in annual SLP sales. Assuming 6% of these products contain mercury, and projecting a 30% success rate for project interventions, the model estimates that 89 metric tons of mercury-added SLPs will be prevented from circulating in the market ($4,946 \times 0.06 \times 0.3 = 89$).

GEF Core Indicator 11

The number of beneficiaries was estimated using the population aged 15–64 in the target countries, representing those most likely to use SLPs. Assumptions were applied as follows: 10% of women in Antigua and Barbuda and Mexico, 20% of women in Cambodia, Pakistan, and the Philippines, and 5% of men across all target countries. This results in an estimated total of 16.49 million individuals (14.4 million women and 2.09 million men). Applying a projected success rate of 30% yields approximately 4.95 million beneficiaries (4.33 million women and 620,000 men). These individuals are expected to benefit from reduced exposure to both mercury added and non-mercury-added SLPs, contributing to improved health outcomes.

The estimates of beneficiaries will be further refined and validated during the inception phase using updated statistical data.

Please refer to Appendix 5 for the detailed GEB calculation worksheet.

Key Risks

	Rating	Explanation of risk and mitigation measures
CONTEXT		
Climate	Low	Exposure to extreme weather conditions affect project activities Likelihood: low; Impact: moderate 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. The project team will assess climate-related risks and activate protocols, if necessary, to mitigate the effects of adverse climatic conditions.
Environmental and Social	Moderate	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 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. As part of the stakeholder engagement plan that will be refined and implemented during the inception 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 inception 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.
Political and Governance	Moderate	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. 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 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 complexity 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 is affected by several challenges: the informal manufacture and distribution of SLPs, behavioral and social norms that sustain demand, and the fragmented regulatory landscape spanning health, pharmaceuticals, food and drug control, and environmental authorities. The variable factors around the adoption and
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		effective implementation of innovative approaches, especially in a multi country context where regulatory maturity and enforcement capacity vary greatly will affect project results. To address these risks, the project will prioritize early stakeholder engagement across relevant authorities - cosmetics, pharmaceuticals, food and drug control, customs, and environmental regulators - to clarify roles and strengthen enforcement coherence. Targeted training sessions and workshops will be provided 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. In parallel, the project will support behaviour change communication to address social norms driving demand for skin lightening products, ensuring that regulatory action is reinforced by public awareness and regional consistency. The informality aspects of the sector will be addressed to the extent feasible as the main focus will still target the formal manufacturing of mercury added SLPs.
Technological	Low	Limitations in terms of laboratory capacity and product testing weaken the interventions Likelihood: low; 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 and 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.
Financial and Business Model	Moderate	Challenges in developing business models and financial sustainability plans related to laboratory capacities and surveillance Likelihood: moderate; Impact: moderate One major challenge related to developing comprehensive business models is securing consistent funding for infrastructure and technology upgrades, especially in the context of the multi-country project, 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. In addition, unclear institutional roles and mandates across health, environmental, and customs authorities can limit the full development and use of laboratory capacities. 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, including regional and national institutions that already conduct laboratory sampling of cosmetics

		and other consumer products for hazardous ingredients. This will help align methodologies, avoid duplication and leverage limited financial resources especially related to the procurement of and training on the related equipments. The in-depth training 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. Persistence of harmful products due to weak business incentives and continued demand Likelihood: moderate; Impact: high Manufacturers, distributors, and sellers may continue producing and marketing mercury added SLPs if financial incentives, profit margins, and consumer demand for these products remain stronger than the perceived risks of non-compliance. In particular, informal actors and small-scale businesses may face challenges with implementation, while weak enforcement or low penalties may fail to sufficiently deter illegal practices. This could undermine market transformation efforts and limit the effectiveness of awareness, regulatory, and enforcement measures under the project. To address these risks, the project will ensure early and continuous engagement with businesses, building partnerships from the inception phase and focusing on voluntary actions supported by economic and market based incentives to shift business behavior. This will include working closely with relevant authorities to strengthen enforcement and apply proportionate penalties, while simultaneously promoting viable financial and technical pathways for manufacturers and sellers to transition toward compliant, mercury free production. By combining demand reduction measures, enhanced enforcement, and positive market signals that reward compliance, the project will reduce the attractiveness of continued participation in harmful supply chains and support a sustained transition toward a safer and more responsible cosmetics sector that promotes natural beauty.
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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 and others, will ensure effective implementation. Establishing close communication and coordination instruments between the Executing Agency, and Ministries of
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		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 Given that the project spans multiple countries with diverse regulatory frameworks and institutional capacities, there is a risk of uneven engagement and commitment among key stakeholder groups, including healthcare actors such as health authorities, dermatologists, pharmacists, and public health institutions. 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 inception to identify key national stakeholders and implement effective engagement strategies tailored to different groups across sectors, including among others health, trade, community leaders, advocates, human rights 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 has been developed 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 risks, this assessment concludes that the overall project risk rating is low. 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) 2026-2029 namely to SP3: thematic subprogramme on Chemicals and Pollution Action. And contributing to the following indicators:

- Number of countries developing, adopting, revising or implementing policies, laws or regulations that advance circular approaches, sound management for chemicals and waste, and pollution prevention and control in key sectors
- Number of private sector entities taking action to improve chemicals and waste management and reduce pollution
- Increase in the number of sectoral and intersectoral efforts advancing positive outcomes for environment and health

Human Health and Environmental Outcomes are optimized through enhanced capacity and leadership in the sound management of chemicals and waste. Furthermore, the project will support multilateral environmental agreements (e.g. Minamata Convention on Mercury), other associated panels and platforms. Finally, the project will promote integrated action, working with key partners to promote and support the achievement of environmental and health benefits, including One Health approach to address risks at the environment-plant-animal-human interface.

Furthermore, the planned activities aimed at curbing both legal and illegal trade in mercury compounds, skin-lightening products (SLPs) and its 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]⁶⁴} as well as UNEP-led initiatives such as the Green Customs Initiative^{[2]⁶⁵}.

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]⁶⁶}.

At the global 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.

The project intends as well to leverage and amplify the efforts taken by the target countries related to consumer protection and access to information, e.g. efforts led by Food and Drug Administration of Philippines^{[4]⁶⁷}, Competition Commission of Pakistan^{[5]⁶⁸}, and global initiatives led by UN Trade and Development Organization^{[6]⁶⁹}.

^[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://www.fda.gov.ph/fda-advisory-no-2021-3569-public-health-warning-against-the-purchase-and-use-of-unauthorized-cosmetic-power-glowing-skin-whitening-set/>

^[5] [https://cc.gov.pk/home/viewpressreleases/689#:~:text=The%20Competition%20Commission%20of%20Pakistan,competition%20in%20the%20cosmetics%20mark](https://cc.gov.pk/home/viewpressreleases/689#:~:text=The%20Competition%20Commission%20of%20Pakistan,competition%20in%20the%20cosmetics%20market.) et.

^[6] <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

The consultation process confirms strong engagement and ownership from key stakeholders across governmental, civil society, private sector, academia, and international organizations, with confirmed potential co-financing from the majority consulted. Government engagement is strongest within environment and chemicals authorities, reflecting clear alignment with Minamata Convention and regulatory objectives. Health sector participation is present, but consultations were limited at the development stage, indicating a need for continued efforts to strengthen integration of public health perspectives as described in the presented Stakeholder Engagement Plan.

Civil society organizations consulted bring robust expertise in chemicals management, advocacy, biodiversity, and patient engagement, strengthening community outreach and accountability. Private sector engagement is diverse and forward-looking, involving cosmetic industry associations, ethical brands, and creative influencers, supporting market transformation and behavior change, though informal and non-compliant market actors remain harder to reach. Academia and UNEP-led global platforms provide strong technical credibility and sustainability pathways.

Overall, consultations indicate a solid foundation for cross-sectoral implementation, with remaining risks related mainly to uneven health sector engagement and regional bodies not yet formally committed, underscoring the importance of targeted, ongoing stakeholder engagement throughout project implementation.

Full list of stakeholders consulted in the PIF development phase:

	Type	Stakeholders	Name of organization	Dates/Status
1	Government	Antigua and Barbuda	Ministries of Environment	Oct 2025 to Jan 2026 - Consulted and co-financing confirmed
2	Government	Antigua and Brabuda	Department of Analytical Services (DAS)	Oct 2025 to Jan 2026 - Consulted and co-financing confirmed
3	Government	Cambodia	Ministries of Environment	June 2025 to Jan 2026 - Consulted and co-financing confirmed

4	Government	Mexico	Ministry of Environment and Natural Resources (SEMARNAT)	Oct 2025 to Jan 2026 - Consulted and co-financing confirmed
5	Government	Mexico	Federal Attorney's Office for Environmental Protection (PROFEPA)	Dec 2025 - Consulted and co-financing confirmed
6	Government	Pakistan	Ministries of Environment	Oct 2026 to Feb 2026 - Consulted and co-financing confirmed
7	Government	Philippines	Food and Drug Administration of the Philippines	June 2025 - Dec 2025 - Consulted and co-financing confirmed
8	Government	Philippines	Department of Environment and Natural Resources (DENR)	June 2025 - Dec 2025- and co-financing confirmed
9	Government	Philippines	Disease Prevention and Control Bureau (DPCB) of Department of Health (DOH)	June 2025 - Dec 2025 - Consulted and co-financing confirmed
10	Government	Japan	National Institute for Minamata Disease, Ministry of Environment of Japan	Aug - Nov 2025 - Consulted and co-financing confirmed
11	GEF Agency	Switzerland	United Nations Environment Programme – Global Mercury Partnership	Continuous - Consulted and co-financing confirmed
12	CSO	Philippines	Ban Toxics	June - Nov 2025 - Consulted and co-financing confirmed
13	CSO	Philippines	EcoWaste (Philippines)	June to Nov 2025 - Consulted and co-financing confirmed
14	Private	Philippines	Chamber of Cosmetic Industry of the Philippines (CCIP)	June to Nov 2025 - Consulted and co-financing confirmed
15	Private	Germany	Kaizen Studio	June to Nov 2025 - Consulted and co-financing confirmed
16	Private	Spain	Angelia Dass	June to Nov 2025 - Consulted and co-financing confirmed
17	CSO	India	Toxic Link	June to Nov 2025 - Consulted and co-financing confirmed
18	CSO	USA	Mercury Policy Project	Continuous - Consulted and co-financing confirmed
19	CSO	Antigua and Brabuda	Marine Ecosystems Protected Area Trust	Oct to Dec 2025 - Consulted and co-financing confirmed
20	CSO	Thailand	Asian Institute of Technology (AIT)	Oct 2025 to Feb 2026 - Consulted and co-financing confirmed
21	CSO	USA	International Alliance of Dermatology Patient Organizations (GlobalSkin)	Sept 2025 to Dec 2025 - Consulted and co-financing confirmed
22	Academia	USA	University of California at Santa Barbara	June to Dec 2025 - Consulted and co-financing confirmed
23	Private	USA	LUSH Cosmetics North America	Jan to Dec 2025 - Consulted and co-financing confirmed
24	Private	USA	Nina Davuluri	June to Dec 2025 - Consulted and co-financing confirmed
25	Private	Sweden	Patheon of Women Who Inspire	Continuous - Consulted and co-financing confirmed
26	Private	USA	Clearya	Jan 2025 to Feb 2026 - Consulted and co-financing confirmed
27	Private	Spain	Building Bridges Hub	Sept 2025 - Feb 2026 - Consulted and co-financing confirmed

28	CSO	USA	Biodiversity Research Institute (BRI)	continuous - Consulted and co-financing confirmed
29	NGO	Pakistan	SDPI	Nov to Dec 2025 - Contacted but no co-financing confirmed
30	NGO	Antigua and Barbuda	IHO	Nov 2025 - Contacted but no co-financing confirmed
31	NGO	Mexico	CASACEM	Oct to Dec 2025 - Contacted but no co-financing confirmed
32	Private sector	France	L'occitane	Oct to Nov 2025 - Contacted but no co-financing confirmed
33	IGO	Guyana	CARICOM	Nov 2025 - Contacted but no co-financing confirmed
34	IGO		ASEAN Cosmetics Committee	Sept 2025 - Contacted but no co-financing confirmed
35	Government	USA	California Department of Public Health	Oct 2025 - Contacted but no co-financing confirmed
36	Government	USA	Minnesota Pollution Control Agency	Oct to Nov 2025 - Contacted but no co-financing confirmed
37	Government	USA	New York City Department of Health & Mental Hygiene.	Oct to Nov 2025 - Contacted but no co-financing confirmed

(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	Global	Chemicals and Waste	Mercury	Grant	5,000,000.00	475,000.00	5,475,000.00
Total GEF Resources (\$)						5,000,000.00	475,000.00	5,475,000.00

Project Preparation Grant (PPG)

Is Project Preparation Grant requested?

true

PPG Amount (\$)

150000

PPG Agency Fee (\$)

14250

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds	Grant / Non-Grant	PPG(\$)	Agency Fee(\$)	Total PPG Funding(\$)
UNEP	GET	Global	Chemicals and Waste	Mercury	Grant	150,000.00	14,250.00	164,250.00
Total PPG Amount (\$)						150,000.00	14,250.00	164,250.00

Please provide justification

Sources of Funds for Country Star Allocation

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

Indicative Focal Area Elements

Programming Directions	Trust Fund	GEF Project Financing(\$)	Co-financing(\$)
CW-2	GET	5,000,000.00	13495626
Total Project Cost		5,000,000.00	13,495,626.00

Indicative Co-financing

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Investment Mobilized	Amount(\$)
Recipient Country Government	National Institute for Minamata Disease, Ministry of Environment of Japan	In-kind	Recurrent expenditures	890000
Recipient Country Government	Department of Analytical Services (DAS) (Antigua and Barbuda)	In-kind	Recurrent expenditures	545000
Recipient Country Government	Department of Environment and Natural Resources (DENR) – Foreign Assisted and Special Projects Service	In-kind	Recurrent expenditures	127430
Recipient Country Government	Food and Drug Administration of the Philippines	In-kind	Recurrent expenditures	1890000
Recipient Country Government	Department of Environment and Natural Resources (DENR) – Environmental Management Bureau	In-kind	Recurrent expenditures	396738
Recipient Country Government	Disease Prevention and Control Bureau (DPCB) of Department of Health (DOH)	In-kind	Recurrent expenditures	100000
Recipient Country Government	Ministry of Environment - Cambodia	In-kind	Recurrent expenditures	2000000
Recipient Country Government	Ministry of Environment and Natural Resources (SEMARNAT) - Mexico	In-kind	Recurrent expenditures	234522
Recipient Country Government	Federal Attorney's Office for Environmental Protection (PROFEPA) - Mexico	In-kind	Recurrent expenditures	197022
GEF Agency	United Nations Environment Programme – Global Mercury Partnership	In-kind	Recurrent expenditures	450000

Civil Society Organization	Ban Toxics (Philippines)	In-kind	Recurrent expenditures	140000
Civil Society Organization	EcoWaste (Philippines)	In-kind	Recurrent expenditures	45000
Private Sector	Chamber of Cosmetic Industry of the Philippines (CCIP)	In-kind	Recurrent expenditures	100000
Private Sector	Kaizen Studio	In-kind	Recurrent expenditures	1000000
Private Sector	Angelia Dass	In-kind	Recurrent expenditures	205882
Civil Society Organization	Toxic Link	In-kind	Recurrent expenditures	20000
Civil Society Organization	Mercury Policy Project	In-kind	Recurrent expenditures	150000
Civil Society Organization	Marine Ecosystems Protected Area Trust	In-kind	Recurrent expenditures	42000
Civil Society Organization	Asian Institute of Technology (AIT)	In-kind	Recurrent expenditures	240000
Civil Society Organization	International Alliance of Dermatology Patient Organizations (GlobalSkin)	In-kind	Recurrent expenditures	20000
Others	University of California at Santa Barbara	In-kind	Recurrent expenditures	880707
Private Sector	LUSH Cosmetics North America	In-kind	Recurrent expenditures	157246
Private Sector	Nina Davuluri	In-kind	Recurrent expenditures	475000
Private Sector	Patheon of Women Who Inspire	In-kind	Recurrent expenditures	2000000
Private Sector	Clearya	In-kind	Recurrent expenditures	75000
Private Sector	Building Bridges Hub	In-kind	Recurrent expenditures	117647
Civil Society Organization	Biodiversity Research Institute (BRI)	In-kind	Recurrent expenditures	996432

Total Co-financing				13,495,626.00
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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	Ms. Kelly West		Executive Coordinator, Global Funds Policy and Programme Division United Nations Environment Programme		kelly.west@un.org
Project Coordinator	Mr. Ludovic Bernaudat		Portfolio Manager, GEF Chemicals and Green Chemistry Unit Industry and Economy Division United Nations Environment Programme		ludovic.Bernaudat@un.org
Project Coordinator	Grace Halla		Task Manager, GEF Chemicals and Green Chemistry Unit, Industry and Economy Division, United Nations Environment Programme		grace.halla@un.org

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

Name	Position	Ministry	Date (MM/DD/YYYY)
Atty. Analiza Rebueta-Teh	Undersecretary	Department of Environment and Natural Resources (the Philippines)	12/9/2025
Diann Black Layne	Ambassador	Ministry of Foreign Affairs (Antigua and Barbuda)	1/30/2026
H.E. San Vanty	Secretary of State	Ministry of Environment (Cambodia)	12/22/2025
Raul Fernando González Romero	Director of Sustainable Financing	Ministry of Finance and Public Credit (Mexico)	2/5/2026
Mahmood Hassan	Additional Secretary II	Ministry of Climate Change and Environmental Coordination	6/11/2026

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.

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>
Antigua and Barbuda	Saint John's	17.12096	-61.84329	Capital city of participating country	
Cambodia	Phnom Penh	11.56245	104.91601	Capital city of participating country	
Mexico	Mexico City	19.42847	-99.12766	Capital city of participating country	
Pakistan	Islamabad	33.72148	73.04329	Capital city of participating country	
Philippines	Manila	14.6042	120.9822	Capital city of participating country	

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

MSP SLPs in Asia and LAC - Annex D - SRIF signed

ANNEX E: RIO MARKERS

Climate Change Mitigation	Climate Change Adaptation	Biodiversity	Land Degradation
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 Beneficiaries Local communities Civil society Type of engagement	Large corporations SMEs Individuals/entrepreneurs Community-based organizations Non-governmental organization Academia Trade unions and workers unions Information dissemination Partnership Consultation Participation Awareness raising Education Public campaigns Behavior change	

	Communications		
Capacity, Knowledge and Research	Capacity development Knowledge generation and exchange Targeted research Innovation Knowledge and learning Stakeholder engagement plan	Knowledge management Innovation Capacity development learning	
Gender Equality	Gender mainstreaming Gender result areas	Beneficiaries Women groups Sex-disaggregated indicators Gender-sensitive indicators Participation and leadership Access to benefits and services Capacity development Awareness raising Knowledge generation	
Focal Area/Theme	Chemicals and waste	Mercury Sound management of chemicals and waste Waste management Disposal Best Available Technology/Best Environmental Practices	Hazardous waste management