

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

Review PIF and Make a recommendation

Basic project information

GEF ID
12353
Countries
Global (Antigua and Barbuda, Cambodia, Mexico, Pakistan, Philippines)
Project Name
Elimination of Mercury-Added Skin Lightening Products (SLPs) in Asia, Latin America and the Caribbean
Agencies
UNEP
Date received by PM
5/22/2026
Review completed by PM

Program Manager
Jewel Batchasingh
Focal Area
Chemicals and Waste
Project Type
MSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

- a) Does the project meet the criteria for eligibility for GEF funding?
- b) Is the General Project Information table correctly populated?

Secretariat's CommentsYes - BRI is executing project the entire project.

Agency's Comments

2. Project Summary

Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?

Secretariat's CommentsYes the issue of SLPS is well documented.

Agency's Comments

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?

b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's CommentsYes.

Agency's Comments

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's CommentsYes

Agency's Comments

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's CommentsYes

Agency's Comments

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's CommentsYes

Agency's Comments

4.2 JUSTIFICATION FOR PROJECT

- a) Is there an indication of why the project approach has been selected over other potential options?
- b) Does it ensure resilience to future changes in the drivers?
- c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?
- d) are the relevant stakeholders and their roles adequately described?

Secretariat's CommentsThe project is well justified.

Agency's Comments

5 B. Project Description

5.1 THEORY OF CHANGE

- a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?
- b) Are the key outputs of each component defined (where possible)?

Secretariat's CommentsYes the ToC is well documented.

Agency's Comments

5.2 INCREMENTAL/ADDITIONAL COST REASONING

Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat's CommentsThis was not evident and should be clarified.

Agency's Comments

Response:12/06/2026

The incremental cost reasoning has been added under Project Rationale.

5.3 IMPLEMENTATION FRAMEWORK

- a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?
- b) Comments to proposed agency execution support (if agency expects to request exception).
- c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area
- d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

Secretariat's Comments

Agency's Comments

5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?

b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?

Secretariat's Comments

CI are detailed for Hg and 11.

CI9.6 methodology gap: CI9.6 (mercury-containing materials and products directly avoided) is reported at 89 MT more than 35 times the CI9.2 reduction target of 2.49 MT. This disparity is significant and requires a clear methodology narrative explaining how the 89 MT avoidance figure was derived, including the assumptions underpinning the market-level calculation. Without this, the figure is not independently verifiable.

Agency's Comments

Response:12/06/2026

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. Appendix 5, Global Environmental Benefits Calculation Worksheet, has been included in the submission package. It outlines a survey-based methodology to estimate the minimum usage of mercury-added Skin Lightening Products (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. 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.

5.5 NGI Only: Is there a justification of financial structure and use of financial instrument with concessionality levels?

Secretariat's CommentsNA

Agency's Comments

5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?

c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

Risks are detailed with the overall rating being moderate.

Innovation risks lack project specificity: The Institutional/Policy risk ("weakness in implementing new regulations") and Financial/Business Model risk ("securing long-term funding for lab infrastructure") read as **generic statements** applicable to any chemicals management project. Under the GEF Risk Appetite Framework, Innovation dimension risks

must be tied to the specific innovative elements of this project, namely, the multi-country simultaneous phase-out strategy and behavioral change mechanisms targeting informal markets. Please revise these narratives to reflect project-specific risk drivers.

Agency's Comments

Response:12/06/2026

The Risk Table has been modified to include description of project specific risks.

5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments Yes there is the potential for the project to be designed for other countries. It will directly impact national policies.

Agency's Comments

6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments Yes the project will endeavour to achieve objectives of the MC and the focal area,.

Agency's Comments

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)

Secretariat's Comments Yes

Agency's Comments

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's Comments NA

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments Yes this was completed.

Agency's Comments

7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments The list is provided but not the dates.

Agency's Comments Dates and range of dates related to stakeholder consultations have been added.

8 Annexes

Annex A: Financing Tables

8.1 Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

STAR allocation?

Secretariat's Comments Yes

Agency's Comments
Focal Area allocation?

Secretariat's Comments

Agency's Comments
LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments
SCCF A (SIDS)?

Secretariat's Comments

Agency's Comments
SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's Comments

Agency's Comments
Focal Area Set Aside?

Secretariat's Comments

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's CommentsYes

Agency's Comments

8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's CommentsYes

Agency's Comments

Annex B: Endorsements

8.4 Has the project been endorsed by the country? (ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's CommentsYes

Agency's Comments

Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?

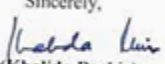
Secretariat's CommentsYes

Agency's Comments

Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?

Secretariat's Comments

All except Pakistan. The letter is signed by:



Sincerely,
(Khalida Bashir)
Joint Secretary (Climate Finance)

However we need the letter to be signed by the current OFP. Please see below.

Pakistan

Ms. Aisha Humera Ch.

Political Focal Point since 2026-02-26

Secretary, MoCC&EC

Ministry of Climate Change and Environmental Coordination

Islamabad

Pakistan

Mr. Mahmood Hassan

Operational Focal Point since 2026-02-26

Additional Secretary-II, MoCC&EC

Ministry of Climate Change and Environmental Coordination

Islamabad

Pakistan

Agency's Comments

Response:12/06/2026

A new LOE from Pakistan was requested and now attached to the submission package.

8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's CommentsNA

Agency's Comments

Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's CommentsLocations are included and shown on a map.

Agency's Comments

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's CommentsSSR was attached.

Agency's Comments

Annex E: Rio Markers

8.8 Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?

Secretariat's CommentsYes

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's CommentsYes the taxonomy was attached.

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments

Agency's Comments

9 GEFSEC Decision

9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

Agency's Comments

9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval

Secretariat's Comments

Agency's Comments
Review Dates

PIF Review

Agency Response

First Review

6/3/2026

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)