

Zero Out Toxic Production

End the unscrupulous manufacturing of mercury-added skin whiteners

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This report builds upon previous work of the Zero Mercury Working Group (ZMWG) in exposing the toxic and often illegal international trade in mercury added skin-lightening products. It underlines once again the importance of regulating and adequately monitoring the manufacturers of these products.

The Zero Mercury Working Group (ZMWG) recently purchased – in four different countries, representing four regions– six widely available brands of skin-whitening cream (SWC) manufactured in Pakistan, as per the labelling on their packaging. All of these creams had been identified by various governments as containing mercury. The ZMWG testing confirmed that, of the 37 cosmetics samples purchased, only two contained less than 1 part per million (ppm) of mercury, confirming that mercury-added SWCs (Hg/SWCs) continue to be produced and exported despite global bans, putting millions of consumers and the environment at risk. Using Pakistan as a case study, these findings highlight the urgent need for stronger enforcement, decisive action from manufacturers, and international cooperation to eliminate the production of these toxic products at their source.

The Minamata Convention on Mercury, ratified by 153 countries until now, prohibits the manufacture, import, and export of cosmetics (except eye area cosmetics), including skin-whitening creams. Mercury, when added to cosmetics, lightens the skin by suppressing the production of melanin and can also remove age spots, freckles, blemishes and wrinkles. However, regular use of Hg/SWCs reduces the skin's resistance to bacterial and fungal infections, and may lead to rashes, skin discoloration and blotching, as well as exposing children and persons sharing dwellings to the creams. Long-term use of Hg/SWCs may damage the eyes, lungs, kidneys, digestive and immune systems.

Since 2017, the ZMWG has carried out extensive market surveillance of SWCs, drawing on the expertise of its members around the world. Through the analysis of over 1,000 products, the group has documented the widespread presence of Hg/SWCs, revealing that these toxic creams are not only pervasive in local markets but also easily accessible online via e-commerce platforms. Many of these Hg/SWCs have already been identified by governments as exceeding the legal limit; nevertheless, the trade of these products continues unimpeded. In some cases, this is due to the lack of appropriate laws and regulations; in other cases, there may be weak enforcement, regulatory loopholes, and/or insufficient international cooperation – often due to inadequate resources and/or conflicting priorities resulting in a lack of the necessary commitment to tackle the problem. Finally, despite the general increase in attention to this issue, in many countries there remains a lack of awareness in key groups such as beauty centre staff, customs officials and healthcare professionals.

In Pakistan, a standard for cosmetics (2017) and a certification process are in place before cosmetics are put on the market. In 2019, the then Minister of State for Climate Change, had raised concerns that manufacturers were jeopardizing the health of young girls by selling toxic SWP, and a public notice for action against manufacturers was issued. No action appears to have been taken since. However, the Competition Commission of Pakistan recently announced that it had launched a "nationwide probe against companies involved in making, marketing and selling mercury-laden whitening creams," with the aim to "protect consumers from serious health risks and to ensure fair competition in the cosmetics market."

Based on our analysis, Pakistan <u>represents</u> around 20% of global Hg/SWCs. Based on these estimates, globally it's projected that around 66 million Hg/SWCs are produced each year, containing over 110 metric tons of mercury compounds. This <u>estimate</u> is based on sales from just one major Pakistani manufacturer, though several large producers operate in the country. Our testing further tends to

indicate that Thailand, China and Pakistan are together responsible for more than half of the world's supply of Hg/SWCs.

Five member organizations of the ZMWG took part in the sampling: the Sustainable Development Policy Institute (SDPI) in Pakistan, Ban Toxics in Philippines, Centre for Environmental Justice and Development (CEJAD) Kenya, and the Mercury Policy Project and We Act in the United States. The SWCs were purchased from local retail shops and from the official manufacturers' websites in Pakistan, and from online platforms distributing these products worldwide: Daraz for Pakistan; Jiji, Jumia and Kilimall for Kenya; Shopee and Lazada for the Philippines; and two online platforms in the U.S. - Aleena Cosmetics and Axabee Skincare.

Testing results revealed that the vast majority of the six cream brands contained high levels of mercury: of the 37 creams purchased, only two were found to contain mercury levels below 1 ppm. The remaining 35 creams contained mercury at significantly elevated levels. The highest recorded level was 24000 ppm in the Goree Beauty Cream with Lycopene purchased in the United States. Several brands, including Faiza and Golden Pearl Beauty Creams, were widely available across all four countries studied. A notable case is the Beauty Cream with Avocado & Aloe Vera by Aneeza Gold, produced by Poonia Brothers – the same company that manufactures Faiza Beauty Cream. While the company has manufacturing facilities in both Pakistan and the UAE, Aneeza Gold is distributed from the UAE and was not found for sale in Pakistan, either online or in physical shops.

Six SWC brands purchased and analyzed in this study

Brand name	Product name	Countries of purchase	Place or site of purchase	Mercury content (in ppm)	Product photo	Countries or regions where a warning has been issued
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Kenya, Philippines	kilimall.co.ke; lazada.com.ph	6164,5 - 14167	AVECZE GOLD BAUTY CREAM Franchis Conference State Confere	EU, US, Philippines
Face Fresh	Beauty Cream	Pakistan, US	daraz.pk; U.S. online platform; Facebook; manufacturer website; Pakistan local market	9963 - 2200	FACE FRESH BESULF WIESEN MOT AND COST AMORE	USA; London (UK); EU
Faiza	Beauty Cream	Kenya, Pakistan, Philippines, US	jumia.co.ke; kilimall.co.ke; Facebook; daraz.pk; lazada.com.ph; U.S. online platform; manufacturer website	2361 - 15000	Taisa Taisa Taisa Taisa	NYC (US), EU, Bangladesh, London (UK), UAE, Philippines, Pakistan
Golden Pearl	Beauty Cream	Kenya, Pakistan, US, Philippines	jiji.co.ke; daraz.pk; Pakistan local market; manufacturer website; shopee.ph; Facebook; U.S. platform	1923,94 - 17000	Golden	USA; California (US); EU; UK; New Zealand; Philippines

Goree	Beauty Cream with Lycopene	Kenya, Pakistan, Philippines, US	daraz.pk; Facebook; shopee.ph; U.S. platform; Pakistan local market	2593,42 - 24000	Correct BARTY CRIANA CR	Sri Lanka, NYC (US), Brunei Darussalam, California (US), Bangladesh, Singapore, Philippines, Canada, Fiji, New Zealand, USA, EU
Parley	Goldie Advanced Beauty Cream	Kenya, Pakistan, Philippines	jumia.co.ke; jiji.co.ke; manufacturer website; daraz.pk; Facebook; shopee.ph	0,03 - 13999	Parley Goldie wat in	NYC (US), Philippines, EU

As these results show, harmful cosmetics remain widely available, despite regulatory bans, for reasons mentioned above. These products put consumers at risk within the country of manufacture and beyond. Dissuading consumers remains a challenge as well, with one Pakistani manufacturer reportedly having an advertising budget of one million USD per year.

While the production of these products continues, importing countries try to curtail their distribution. A number of governments have issued warnings for the six SWCs tested here, such as the EU Safety Gate, the Philippines Food and Drug Administration, the New York State and others. More than a hundred Hg/SWCs have been listed on the EU Safety Gate, and more than half of them are made in Pakistan (57 out of 110 as of September 25th, 2025). From the Faiza Beauty Cream notification in 2013, to the Parley Goldie Advanced Beauty Cream notification in September 2025, all six creams examined in this study are now listed on the EU Safety Gate.

Eliminating the manufacture, and hence the supply of Hg/SWCs at the source should be a priority, especially given the difficulties encountered when tackling their distribution or sales. To that end ZMWG recommends the following:

- <u>Identify SWC manufacturers:</u> A comprehensive understanding of the global manufacturing landscape will help prioritize enforcement actions, allocate resources efficiently, and ensure that mercury-added SWCs are eliminated at their source.
- Ensure comprehensive legislation and close legal loopholes: Review and address gaps in existing legal frameworks to prevent mercury and other banned chemicals from being used in cosmetics.
- <u>Develop a compliance roadmap for manufacturers;</u> The roadmap should phase out Hg/SWC production, including a timeline, "checklists," a stakeholder engagement strategy, and interagency coordination.
- <u>Strengthen enforcement against non-compliance:</u> Focus especially on cross-boundary transport of prohibited mercury-added cosmetics.
- Enhance market surveillance and monitoring capacity; This should include the provision of handheld testing devices.
- Regulate mercury supply: Control the production and trade of mercury and mercury compounds used in SWC production.