

# EEB Feedback to the Call for Evidence on the Evaluation of the Cosmetic Products Regulation

21 March 2025

The European Environmental Bureau<sup>i</sup>, supported by the Zero Mercury Working Group<sup>ii</sup> appreciates the opportunity to provide evidence on the evaluation of the Cosmetics Products Regulation (CPR). The CPR has played a crucial role in ensuring a high level of consumer safety, notably by keeping the most harmful substances out of cosmetics, becoming a reference at global level. While there may be several elements of concern, this input refers mainly to the application of the ban of mercury and its compounds in cosmetics, the digital transition, and mercury related exemptions.

Despite being regulated, illegal mercury-added cosmetics, particularly skin-lightening products (SLPs), continue to reach EU consumers mostly via online platforms and through new schemes that were not considered at the time the CPR was first drafted. Given the direct health impact those may have especially if they contain mercury, but also other illegally contained substances<sup>iii</sup>, it is necessary that such loopholes are addressed.

Some exemptions related to eye products do not seem to be necessary anymore, as manufacturers appear not to use any more thimerosal and phenylmercury salts used as a preservative and other alternatives are available.

The manufacture and trade of mercury compounds used for cosmetics need to further be investigated and eventually regulated.

## 1. Health risk of mercury-added skin-lightening products

Despite its hazardous effects, mercury is added to skin-lightening products because it suppresses the production of melanin. Mercury-added SLPs present significant health risks. The World Health Organization (WHO) recognizes mercury as a “major public health concern.” Moreover, due to the common lack of full disclosure of ingredients on the labels, users are often unaware of the toxic substances in these products and the risks they may pose to their health and to those living with them.

Prolonged exposure to mercury can lead to serious health problems, ranging from dermatological to neurological issues. Additionally, beyond the mercury exposure through SLPs, the entire life-cycle of mercury—from source to final release or disposal—may have cumulative and disproportionate impacts on human health and the environment, especially when combined with other toxic substances in the daily living environment.

Regular use of mercury-added SLPs can reduce the skin’s resistance to bacterial and fungal infections. Depending on the concentration of mercury and the sensitivity of the user, this may result in rashes, skin discoloration, and blotching. Mercury from these products can enter the body through skin absorption, inhalation, or ingestion. Due to its ability to vaporize and spread through contact, mercury

### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

in SLPs is not only a risk to the user but may also expose other household members. Infants, children, and developing foetuses are particularly vulnerable to the developmental health effects of mercury. Long-term use of mercury-added SLPs can damage the eyes, lungs, kidneys, digestive system, immune system, and nervous system<sup>iv</sup>.

The Europe Skin Lightening Products Market is expected to witness market growth of 4.8% CAGR during the forecast period (2022-2028)<sup>v</sup>.

## 2. Mercury-added cosmetics are still available even though prohibited

### EU and global regulations of mercury in cosmetics

According to Article 14 and Annex II of the Cosmetic Products Regulation 1223/2009, mercury and its compounds are banned in cosmetics, except those special cases included in Annex V. This ban is reaffirmed in the Mercury Regulation 217/852<sup>vi</sup>, as amended by Regulation 2024/1849<sup>vii</sup>, which states in Article 5: “the export, import and manufacturing in the Union of the mercury-added products set out in Annex II shall be prohibited” Cosmetics are included in Annex II. An exemption allows mercury use in eye products as a preservative.

At the global level, the Minamata Convention on Mercury<sup>viii</sup>, a multilateral environmental agreement that addresses specific human activities that contribute to widespread mercury pollution, also introduces a ban of the import, export and manufacture of mercury-added cosmetics in Annex A part 1, including the exemption allowing for mercury use in eye products.

### Evidence on the ongoing availability of mercury-added SLPs online

Searches of online platforms for suspect mercury-added skin lightening products (SLPs)—once sold primarily in local (informal) markets and beauty stores— have demonstrated that offerings and sales of SLPs have exploded globally and online. The latest Zero Mercury Working Group (ZMWG) [investigation](#) of suspect SLPs confirmed yet again that mercury-added SLPs are still widely available around the world.

The ZMWG published five reports since 2017 on market surveillance of suspect SLPs. Since then, in collaboration with our NGO partners from more than 20 countries, it has analysed over 1000 SLPs from over 40 online platforms worldwide. Our [database](#) is available on our website and is also accessible on the [UNEP Global Mercury Partnership website](#).

Between 2013 and 2024, multiple studies and databases highlight the persistence of mercury-added SLPs, also in the EU:

- **EU Safety Gate reports:** 33 alerts for mercury-containing SLPs, with an average mercury content of 11,000 ppm, and a maximum of 44,000 ppm. These products primarily originate from Pakistan and Thailand.
- **ZMWG investigations in the EU and UK:** the several campaigns organised by the ZMWG also included sampling from the EU (Belgium and the UK). For the period 2013-2024, in total, 65

#### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

creams were purchased from Belgian local markets, amazon.co.uk, befr.ebay.be, best.aliexpress.com, bol.com and amazon.com.be, out of which 31 creams had mercury levels higher than 1 ppm, with an average mercury content of 5 828 ppm. These products mainly have been manufactured in Pakistan, China, and Thailand as per the labelling on the packaging.

The full results are available in Annex 1 and 2 of this feedback. All samples collected by ZMWG have been analysed in a laboratory. The methodology used can be found in the respective reports depending on the year of sampling.

### 3. CPR and EU product safety legislation appear inadequate to address current issues.

#### Responsibilities and consumer protection

In the CPR, the definitions of distributor” as *‘any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a cosmetic product available on the Community market’*, and of *‘making available on the market’ as ‘any supply of a cosmetic product for distribution, consumption or use on the Community market in the course of a commercial activity, whether in return for payment or free of charge’* could be understood to also include online platforms and whoever makes available a product via internet, with all the relevant responsibilities and requirements that go along. Yet it does not seem to be read like that by the legislators and enforcement authorities. As a result, while rather strict measures apply on the ground with respect to cosmetics, the digital means of putting them on the market are not addressed sufficiently. The sale or offering of sale of mercury added cosmetics is not banned via the CPR nor the Mercury regulation although similar examples are available in several US states (e.g. [New York](#), [Minnesota](#)) and other countries (e.g. [Gabon](#), [Sri Lanka](#)).

As a result, the responsibility of online platforms and online service providers appears to then be left to be covered by other relevant EU instruments.

The [EU safety gate system](#) further allows for information on measures taken against non-food dangerous products, including cosmetics, to be circulated quickly among the national authorities responsible for product safety in the Single Market countries. This system is contributing to the protection of the market against mercury containing products but puts the burden on the authorities.

Horizontal regulatory frameworks—such as the [General Product Safety Regulation \(GPSR\)](#), the [Product Liability Directive](#), and the [Digital Services Act \(DSA\)](#)—offer some level of protection. For instance, under the GPSR, online platforms must remove mercury-laden cosmetics notified by authorities within two days, among others. However, this framework does not put direct responsibility on the online marketplaces and platforms or other intermediaries, to prevent such products from being sold, allowing for such products to still be available; as such they are not designed to tackle the persistent availability of these specifically harmful products.

#### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

To that end, the EU has further complemented this legislation with voluntary measures such as the adoption of the EU Product Safety Pledge (PSP), and EU Product Safety Pledge +, a voluntary agreement between the Commission and the online platforms, pledging to detect and prevent the sale of unsafe products, co-operating with statutory authorities responsible for product safety, raising consumer product safety awareness amongst third party sellers and empowering consumers on product safety issues.

Promoted through the PSP and in general, the development of AI-powered tools has made it increasingly feasible for online platforms to scan and detect illegal products in their listings. Still however, sellers may find ways to escape such searches by changing slightly the product spelling, name or other, still allowing dangerous products to become available for consumers.

It is also worth noting that Amazon.com was taken to court<sup>ix</sup> by the California Attorney General's office, under the state's Proposition 65 and its Unfair Competition Law, as they were selling mercury added creams, without warning the consumer that these could potentially be cancerogenic. Recently, and after reaching a settlement, Amazon.com changed their policy asking all sellers to have tested their skin lightening products for mercury and other hazardous substances, with those being verified through Amazon approved accredited labs, before they would be allowed to make them available on their platform.

Other factors are also limiting the impact of the EU horizontal legislation and voluntary complementary measures:

- The rise of promotion or advertising, on social media platforms presents an additional regulatory challenge, making it harder to monitor and control illegal product distribution.

In the online sphere, offers for mercury-added cosmetics are not only found on marketplaces, but they also appear on social media such as Facebook, Instagram or TikTok. Some accounts make the promotion of these products, but the sale is not directly concluded on the online platform, but privately. We consider that not only the sale, manufacture, import and export of mercury-added cosmetics should be prohibited, but also this kind of advertising and promotion. See also our latest report "Online Marketing of Toxic Skin Lighteners", published in October 2023.

As with online marketplaces, the EEB considers that these social media platforms should be controlled, and have at the least, a more proactive role in preventing illegal cosmetics to appear, using notably AI tools.

- Mercury content is quasi never indicated on packaging of these SLPs.

The fact that mercury is never indicated on the packaging, makes it difficult for customs and market surveillance authorities to identify and intercept illegal products.

- Not all customs and market surveillance agencies have the necessary equipment to detect mercury in cosmetics.

## Uneven playing field

### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

*International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:*

*ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles*

The availability of non-compliant cosmetics not only puts customer's safety at risk but also creates an uneven level playing field between the companies that comply with the EU legislation, and the free riders that benefit from ignoring the EU legislation. This puts EU-based brands at a disadvantage while allowing unsafe products to persist in the market. EU legislation should ensure that all operators (on the ground and online) putting products on the EU market comply with EU standards, fostering a fair and competitive European market.

The need for the online platforms to have responsibility for the products they sell is a wider EU stakeholder request. The EEB signed a [joint statement](#) together with NGOs and European industry warning that online sellers could escape the EU's product sustainability and chemical safety requirements using the e-market loopholes.

The need to give responsibility to online platforms for the cosmetics they sell appears to also be a request from the European cosmetics industry when one looks at Cosmetics Europe comments submitted to the [DSA](#) and [GPSD](#) in 2020.

As a result, while progress has been made through current legislative and voluntary initiatives, the problem remains. Given however the direct health impacts of mercury-added SLPs, and the fact that online platforms have demonstrated their ability to take measures to proactively prevent, detect and remove flagged products, a **sector-specific approach is therefore necessary to specifically address mercury added SLPs from online services and to ensure effective enforcement.**

#### **4. Mercury compounds are not necessary as a preservative for eye products**

As mentioned above, the CPR exempts the eye area products where mercury is used as a preservative. However, it appears that there are effective and safe non-mercury preservatives and therefore a mercury exemption for eye products would not be necessary<sup>x</sup> anymore.

We would like to bring to your attention the fact that in the US, several states have not included such exemptions since as early as 2007. For example, the Minnesota law enacted in 2007 does not include an exemption for eye-area cosmetics<sup>xi</sup>. The same holds for the Illinois law enacted in 2009, except of Public Act 095-1019/SB2860<sup>xii</sup>.

More recently, the [ASEAN Cosmetics Association](#) reported that based on their industry survey with 68 respondents there are no products containing mercury as preservatives in the market. Following this, in November 2019, during their 31<sup>st</sup> meeting, the ASEAN consultative Committee for Standards and Quality, the ASEAN Cosmetic Committee and the ASEAN Cosmetic Scientific Body agreed to remove thiomersal and phenylmercuric salts from [ASEAN Cosmetics Directive Annex VI](#) (exempted substances) and revise accordingly [Annex II](#) (prohibited substances - Ref. No. 221).

Pursuant to the ASEAN Cosmetic Directive, [adopted by the Philippine Food and Drug Administration](#) (PH FDA) in 2005 and as per the revision of 2019, Mercury and its compounds (CAS numbers: 7439-97-6, \*54-64-8, 62-38-4, 94-43-9, 102-98-7, 1192-89-8, and 100-56-1) [thimerosal and phenylmercuric

#### **European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

*International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:*

*ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles*

salts] are banned ingredients and included in the list of substances which must not form part of the composition of cosmetic products (Annex II Ref. No. 221).

It further appears that Indonesia has also taken similar measures.

To that end we would kindly request that the Commission look further at this matter towards also banning mercury use as preservative from eye products.

## 5. Regulate the trade of mercury compounds used in cosmetics

A report published in October 2023 by the Environmental Investigation Agency entitled "[Mercury in Retrograde - The Dark World of Toxic Skin Lightening Products](#)" reveals that it is standard practice for skin lightening products (SLPs) producers across the globe to manufacture SLP products consisting of 3-4% of a mercury compound, most often ammoniated mercury (CAS number 10124-48-8). The production of these products is facilitated by the unregulated trade of most mercury compounds. Those who trade in mercury compounds can operate with impunity across jurisdictions, even while openly and plainly stating that the compounds are intended to be used in SLPs. The investigation found several implicated companies, including one company manufacturing ammoniated mercury in Spain, whose owner admitted to supplying this compound, among others, to manufacturers of SLPs, a use not allowed by the Minamata Convention.

The decision MC-5/3 taken at the latest Conference of the Parties of the Minamata Convention in 2023 based upon the outcomes of the above-mentioned study as well as an NRDC commissioned report<sup>xiii</sup> requested the Secretariat to carry out a study on the global supply, production, trade and use of mercury compounds. The first [draft](#) of this study has been recently published and confirms the findings of the EIA study that European companies are implicated in the trade of mercury compounds.

Once ammoniated mercury, or other compounds with a skin lighting properties, are supplied to SLP manufacturers in countries like India, Thailand and Pakistan, the resulting products can also reach the EU market thanks to legal loopholes in online sales.

In the EEB [position](#) towards a robust revised EU Mercury Regulation, the issue of trade of mercury compounds used in cosmetics had already been highlighted as an area that needs to be better regulated. Given the use of mercury compounds in cosmetics is banned at EU level and not allowed by the Minamata Convention at global level, the EEB supports the ban of the manufacture, import and export of mercury compounds used in cosmetics.

While the adopted revised EU mercury regulation now includes some relevant provisions<sup>xiv</sup>, the revision of the cosmetics directive is an opportunity to tackle this issue and align different elements warranting further investigation by the Commission.

### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

## 6. Our key recommendations for the Cosmetic Products Regulation revision

### Provisions preventing the online sale of cosmetics containing banned ingredients

- It has to be ensured that what applies for on the ground operators also applies for online providers, so also when products are made available to the EU consumers, via the internet. This could be achieved via different modifications of the CPR, including:
  - Revising relevant definitions of economic operators to also cover online platforms
  - Giving clear responsibility to online platforms and overall online service providers (e.g. social media) for the cosmetics they offer for sale online;
  - Banning the sales and offers of sales for banned cosmetics.

Further considerations for the review include but are not limited to:

- Requiring that e-commerce platforms and even other online providers request testing of the skin lightening products they offer for sale.
- Requiring e-commerce platforms to browse their content to look for these products flagged on EU safety gate – a measure part of the EU Safety Pledge +.

### Mercury compounds used in cosmetics

- Further investigate and eventually ban the use of mercury-based preservatives from eye products.
- The ban of the manufacture, import, export, sale and offering of sale of mercury compounds used in cosmetics.

#### Information contact:

Raphaëlle Catté, Policy Officer for Mercury, [raphaelle.catte@eeb.org](mailto:raphaelle.catte@eeb.org)

#### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • [eeb@eeb.org](mailto:eeb@eeb.org) • [www.eeb.org](http://www.eeb.org)

*International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:*

*ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles*

## Annex 1: EU safety gate alerts for mercury-added cosmetics (2013-2023)

Brand Name	Product Name	Year of sampling or alert	Country where Product was found	Place of purchase	Country of origin/manufacture as per packaging	Hg level ppm or mg/kg
88 total white	Underarm cream	2023	Sweden		Thailand	4100
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	2020	Sweden	N/A	Pakistan	21300
Beauty Clinic	Beauty Cream	2019	Norway	N/A	Pakistan	11200
Bio Claire	Crème corporelle éclaircissante	2020	Sweden	N/A	Côte d'Ivoire	5,38
Brite Face	Whitening Cream	2013	United Kingdom	N/A	Pakistan	15000
Chandni	Whitening Cream	2020	Sweden	N/A	Pakistan	13,7
Crème C.T.R. Diana		2021	Germany	N/A	Lebanon	7502
Crème C.T.R. Diana		2021	Germany	N/A	Lebanon	8061
Crème C.T.R. Diana		2019	Norway	N/A	Lebanon	13600
Crusader	Medicated Soap	2022	Sweden	N/A	Unknown	12000
Daggett & Ramsdell	Knee & Elbow	2019	Norway	N/A	United States of America	2,5
Diamond White	Extra Whitening Cream	2025	Sweden	Pakistan		31000
Diana	Anti-freckle	2006	France	N/A	Lebanon	>1
Dona White	Extra Whitening Lotion	2023	Sweden	N/A	Italy	1,33
Due	Beauty Cream	2013	United Kingdom	N/A	Pakistan	11700
Eleven Herbal	Ubtan	2019	Norway	N/A	Pakistan	9,5
E'Yôte	Whitening Spot-Removing Cream	2013	Norway	N/A	China	6900
E'Yóuth	Skin-lightening product	2013	Norway	N/A	China	2000
Face Fresh	Beauty Cream	2013	United Kingdom	N/A	Pakistan	4620
Facing you [translation from Arabic]	Whitening Spot-Removing Set	2013	Norway	N/A	China	4000

### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles



Faiza	Beauty Cream	2013	United Kingdom	N/A	Pakistan	5940
Faiza	Beauty Cream	2013	United Kingdom	N/A	Pakistan	5430
Faiza	Beauty Cream	2020	Sweden	N/A	Pakistan	8150
Faiza	Beauty Cream	2019	Norway	N/A	Pakistan	28500
Fasco	Herbal cream	2007	Denmark	N/A	Philippines	440
Feique	Rose Withening Anti-Freckle	2019	Norway	N/A	China	16400
Feique	Rose Withening Anti-Freckle	2019	Norway	N/A	China	19700
Flori's - Duo		2019	Norway	N/A	France	8300
Fresh Look	Ultra Whitening Fairness Cream	2013	United Kingdom	N/A	Pakistan	3500
GC - Golden Care	Extra Whitening Cream	2019	Norway	N/A	N/A	4500
Golden Pearl	Beauty Cream	2013	United Kingdom	N/A	Pakistan	4750
Golden Pearl	Beauty Cream	2020	Sweden	N/A	Pakistan	16800
Golden Pearl	Beauty Cream	2019	Norway	N/A	Pakistan	3,3
Golden Pearl	Beauty Cream	2023	Austria	N/A	Pakistan	Not specified
Goree	Whitening Cream with Lycopene	2013	United Kingdom	N/A	Pakistan	9870
Jaribu	Le Vrai Savon Antiseptique - Jaribu Kwanza (soap)	2002	Germany	N/A	N/A	9100
Jiaoli		2013	Norway	N/A	China	5000
Kojie San	Skin lightening face cream with HydroMoist	2022	Sweden	N/A	Philippines	0,8
Lulanjina	Teixieo meibai Qubanwang	2013	Norway	N/A	China	24000
MEDICAM	Bleach Cream - Skin Whitening Cream	2014	Austria	N/A	Pakistan	38800
Montclair	Soap	2012	Germany	N/A	Malaysia	5760
Natural Face	Beauty Cream	2023	Sweden	N/A	Pakistan	5270
Natural Face	Beauty Cream	2020	Sweden	N/A	Pakistan	5820

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

Natural Face	Beauty Cream	2019	Norway	N/A	Pakistan	17300
New Face	Whitening Cream	2020	Sweden	N/A	N/A	5,56
New Face	Whitening Cream	2019	Norway	N/A	N/A	25400
Noor	Herbal Beauty Cream	2022	Sweden	N/A	Pakistan	21700
Noor Gold	Beauty Cream	2022	Sweden	N/A	Unknown	44000
Orient Pearl	Skin-lightening product	2013	Norway	N/A	Taiwan	12000
Pan Yu	OLIVE - Natural-Active Olive	2013	Norway	N/A	China	8600
Pan Yu	GREEN TEA - Natural - Active Green Tea	2013	Norway	N/A	China	3300
Pearl Face	Whitening Beauty Cream	2013	United Kingdom	N/A	Pakistan	15000
POP Popular	Facial cream	2009	Netherlands	N/A	Thailand	10000
Qian Mei		2013	Norway	N/A	N/A	4300
Qianli		2013	Norway	N/A	N/A	2500
Q-nic Care	Whitening Underarm cream	2023	Sweden	Thailand		4840
Raj Pharmacy	Skin-lightening product	2013	United Kingdom	N/A	Pakistan	470
Roop Amrit	Face Crean	2013	United Kingdom	N/A	Pakistan	422
Roop Rang		2021	Germany	N/A	Pakistan	15590
Rose Cream		2019	Norway	N/A	Lebanon	4,8
Roushun	Skin Care - Vitamin C serum	2022	Sweden	N/A	Unknown	0,22
Sandal	Whitening Beauty Cream	2020	Germany	N/A	Pakistan	14,65
Seven Herbal	Ubtan	2013	United Kingdom	N/A	Pakistan	620
Seven Herbal	Wrinkle DeCrease Anti Aging Cream	2013	Norway	N/A	Pakistan	820
Seven Herbal	Ubtan	2019	Norway	N/A	Pakistan	5,4
Sheesha	Beauty Cream - A Whitening Cream with natural sun block - Advocado & Aloe Vera	2021	Sweden	N/A	Pakistan	12600
Sheesha	Beauty Cream	2022	Germany	Pakistan		17000

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

Sheesha	Beauty Cream	2023	Sweden	N/A	Unknown	17400
Shirley	Medicated Cream	2009	Germany	N/A	Taiwan	25600
Shivanya	Beauty Cream	2021	Sweden	N/A	Pakistan	9270
Shivanya	Beauty Cream	2022	Sweden	N/A	Pakistan	10300
Shivanya	Beauty Cream	2022	Austria	N/A	Pakistan	13500
Shivanya Gold	Beauty Cream	2022	Sweden	N/A	Unknown	12200
Speckle Doctor	Whitening Spot-Removing Cream	2013	Norway	N/A	China	9700
Stillman's	Freckle Cream	2009	United Kingdom	N/A	Pakistan	31000
Stillman's	Freckle cream	2012	United Kingdom	N/A	Pakistan	1200
Stillman's	Skin Bleach Cream	2012	United Kingdom	N/A	Pakistan	21,5
Stillman's	Skin Bleach Cream	2014	Austria	N/A	Pakistan	16400
Stillman's	Freckle cream	2007	Denmark	N/A	United States of America	39000
Stillman's	Freckle cream NEW	2007	Denmark	N/A	United States of America	42000
Stillman's	Skin Bleach Cream	2006	Germany	N/A	United States of America	50000
Super White	Beauty Cream	2023	Sweden	N/A	Pakistan	16900
Taryak Cream	Beauty & Freckles	2023	Sweden	N/A	Pakistan	6480
Thai Beauty Cream	For night use	2021	Sweden	N/A	Pakistan	10900
Unknow (language issue)	Face cream - White cream (jar 2)	2006	Germany	N/A	N/A	6600
Unknow (language issue)	Face cream - Yellow cream (jar 1)	2006	Germany	N/A	N/A	7100
White Gold	Whitening cream with Papaya extracts	2022	Sweden	N/A	Pakistan	23,2
White Gold	Whitening cream with Blackberry extract	2013	Norway	N/A	Pakistan	9720
White Me	Under Cream	2025	Sweden	N/A	Thailand	1640
White Me	Under Cream	2025	Sweden	N/A	Thailand	4950
Whiten skin	1 Whiten Active Anti-Spot Day Cream - 2 Whiten Active	2013	Norway	N/A	N/A	1800

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

	Anti-Spot Night Cream					
Wiana	Whitening Beauty Cream	2013	United Kingdom	N/A	Pakistan	11400
Xian Li		2020	France	N/A	China	3800
Yimei	Whitening Spot-Removing Suit	2013	Norway	N/A	China	5800
Yimei		2013	Norway	N/A	China	1800
Yimei		2013	Norway	N/A	China	1900

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

**Annex 2: extract from the ZMWG database on SLPs purchased in the EU and in the UK with >1ppm**

Brand Name	Product Name	Year	Country where Product was found	Place of purchase	Name of place of purchase	Country of origin/ manufacture as per packaging	Hg level ppm or mg/kg
Chandni	Whitening Cream	2019	United Kingdom	Online platform	Amazon	Pakistan	11928
Golden Pearl	Beauty Cream	2019	United Kingdom	Online platform	Amazon	Pakistan	10515
Golden Pearl	Beauty Cream	2019	Belgium	Online platform	Ebay	Pakistan	5266
Golden Pearl	Beauty Cream	2019	Belgium	Online platform	Ebay	Pakistan	10338
Goree	Beauty Cream with Lycopene	2019	Belgium	Online platform	Ebay	Pakistan	12656
Jiaobi	Whitening & Moisturizing set - Whitening Night Cream	2019	Belgium	Online platform	Ebay	China	15404
Jiaobi	Whitening & Moisturizing set - Whitening Make-up Base	2019	Belgium	Online platform	Ebay	China	20813
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Day (Set C)	2019	Belgium	Online platform	Ebay	China	585,7
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Night (Set C)	2019	Belgium	Online platform	Ebay	China	1543,9

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

POP Popular	Facial Cream	2019	Belgium	Online platform	Ebay	Thailand	1,91
POP Popular	Facial Cream	2019	Belgium	Online platform	Ebay	Thailand	2,2
White Rose	Whitening Cream - Super Gold Caviar	2019	Belgium	Online platform	Ebay	Thailand	6188
Arché	Formula AA Pearl Cream	2021	Belgium	Online platform	Aliexpress	Thailand	23,9
Collagen Plus - Vit E	Night Cream	2021	Belgium	Online platform	Aliexpress	China	3090
Due	Beauty Cream	2021	Belgium	Online platform	Ebay	Pakistan	14138
Face Fresh	Beauty Cream	2021	Belgium	Online platform	Ebay	Pakistan	7716,7
Jiaobi	Whitening & Moisturizing set - Whitening Day Cream	2021	Belgium	Online platform	Ebay	N/A (language issue)	2,9
Jiaobi	Whitening & Moisturizing set - Whitening Night Cream	2021	Belgium	Online platform	Ebay	N/A (language issue)	9013
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Day (Set D)	2021	Belgium	Online platform	Aliexpress	China	1196,7
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Night (Set D)	2021	Belgium	Online platform	Aliexpress	China	1207,6
Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Night (Set E)	2021	Belgium	Online platform	Aliexpress	China	1370,8

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

Jiaoli	HuiChuSu Face Cream 7 Days Specific Eliminating Freckle - Day (Set E)	2021	Belgium	Online platform	Aliexpress	China	1708,5
Jolié	Beauty Cream	2021	Belgium	Online platform	Ebay	Pakistan	6967
New Face	Beauty Cream	2021	Belgium	Online platform	Ebay	Pakistan	15594
Parley	Herbal Beauty Cream with Avocado	2021	Belgium	Online platform	Ebay	Pakistan	18821
Sandal	Whitening Beauty Cream	2021	Belgium	Online platform	Ebay	Pakistan	8067,8
Arché	Formula AA Pearl Cream	2023	Belgium	Online platform	Ebay	Thailand	1,46
Collagen Plus Vit E	Day Cream	2023	Belgium	Online platform	Ebay	N/A	1,18
Collagen Plus Vit E	Night Cream	2023	Belgium	Online platform	Ebay	N/A	6842
Papaya	Whitening & Freckle-Eliminating package - Day Cream	2023	Belgium	Online platform	Amazon	China	2847
Papaya	Whitening & Freckle-Eliminating package - Night Cream	2023	Belgium	Online platform	Amazon	China	4306

**European Environmental Bureau**

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

<sup>i</sup> The **European Environmental Bureau (EEB)** is the largest network of environmental citizens' organisations in Europe, founded in 1974. It currently consists of over 185 member organisations in 41 countries, including a growing number of networks, and representing some 30 million individual members and supporters. The EEB stands for sustainable development, environmental justice, global equity, transparency and participatory democracy. It promotes the principles of prevention, precaution and the polluter-pays.

<sup>ii</sup> The EEB together with the Mercury Policy Project launched in 2005 the **Zero Mercury Working Group (ZMWG)**, and are co-coordinating it since then. The ZMWG is an international coalition of more than 110 non-governmental organizations (NGOs) from over 55 countries. It strives towards reducing and eliminating anthropogenic mercury emissions and the use of mercury in products and processes and supports the implementation of the Minamata Convention on Mercury.

In 2017, the [ZMWG started a global NGO campaign](#), focusing on supporting national government efforts to ban the manufacture, import, export and use of mercury-added cosmetics. Over 1000 skin lightening creams have been analysed, from local markets and mainly purchased from over 20 countries and more than 40 online platforms, available from [our database](#). In the six reports published, findings show the high mercury content in many of these products, discussing the continuous mercury crisis especially in this sector.

<sup>iii</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0273230019301199>

<sup>iv</sup> [Online Marketing of Toxic Skin Lighteners, ZMWG, 2023](#)

<sup>v</sup> <https://www.researchandmarkets.com/reports/5636733/europe-skin-lightening-products-market-size?srsId=AfmBOooP2h873Lyv-Lf5BTSrSk7raShsCoRj0fn1Xk3D9CTTWZ7rSsoT>

<sup>vi</sup> <https://eur-lex.europa.eu/eli/reg/2017/852/oj/eng>

<sup>vii</sup> <https://eur-lex.europa.eu/eli/reg/2024/1849/oj/eng>

<sup>viii</sup> <https://minamataconvention.org/en/documents/minamata-convention-mercury-text-and-annexes>

<sup>ix</sup> <https://www.asyousow.org/press-releases/2025/1/31/amazon-to-block-sales-of-skin-lightening-creams-containing-mercury-in-response-to-lawsuit-under-proposition-65s-toxic-enforcement-act>

<sup>x</sup>

<https://static1.squarespace.com/static/54934e57e4b0a75bf4c1c07e/t/54d2944ae4b05f7dfea65428/1423086666013/Preservatives-FINwss.pdf>

<sup>xi</sup> Minn Stat. 116.92 Subd. 8h. Ban; mercury in over-the-counter pharmaceuticals. After January 1, 2008, a person may not sell, offer for sale, or distribute in the state for human use an over-the-counter pharmaceutical product containing mercury. Subd. 8i. Ban; mercury in cosmetics, toiletries, and fragrances. After January 1, 2008, a person may not sell, offer for sale, or distribute in the state a cosmetic, toiletry, or fragrance product containing mercury.

<sup>xii</sup> (410 ILCS 46/22 new) Sec. 22. Sale and distribution of cosmetics, toiletries, or fragrances containing mercury. No person shall distribute or sell any cosmetics, toiletries, or fragrances containing mercury. Any person who knowingly sells or distributes mercury-containing cosmetics, toiletries, or fragrances in this State is guilty of a petty offense and shall be fined an amount not to exceed \$500.

<sup>xiii</sup> <https://www.nrdc.org/sites/default/files/2023-10/mercury-compounds-inventory-feasibility-study-202303.pdf>

<sup>xiv</sup> *“by 31 December 2029, the Commission shall report to the European Parliament and to the Council on: [...] (c) the developments under the Convention as regards the phase-out of illegal mercury use in cosmetics, taking into account information provided by Parties to the Convention in line with Decision MC-5/5 of the Conference of the Parties on the preparation of a report on cosmetics; and (f) the need to expand the list of mercury compounds set out in Annex I, by adding, for example, mercuric azanide chloride (HgNH<sub>2</sub>Cl)”*

#### European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org

International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:

ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles