

**The global online toxic trade in illegal  
mercury-added skin lighteners  
continues unabated  
outside the USA**



October 2025

# **Poisoning for Profit:**

## **Amazon's Double Standard**

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## 1 Executive Summary

This report documents the ongoing availability of mercury added skin lightening products (SLPs) on Amazon websites around the world, despite a recent legal settlement with Amazon.com in the United States. The legal settlement in the U.S.—negotiated by the U.S. State of California Attorney General and citizen enforcers—requires Amazon.com to eliminate sales offerings of toxic SLPs into California, but generally applies to the entire U.S. Unfortunately, it does not apply to the E-commerce giant's other sales operations outside the U.S. in over 20 countries, with dedicated websites still selling mercury added SLPs into over 100 countries.

This report builds upon previous work of the Zero Mercury Working Group (ZMWG) in exposing the toxic and often illegal trade in mercury added SLPs globally and, in this particular case, sales offerings by Amazon worldwide. Although banned by the Minamata Convention and numerous governments, the manufacture, trade, advertising and sales of mercury added SLPs often continue unimpeded on the largest E-commerce platform in the world, who has pledged that “...every product for sale is safe.”

Mercury, when added into SLPs, lightens the skin by suppressing the production of melanin and can also remove age spots, freckles, blemishes and wrinkles. However, regular use of mercury added SLPs reduces the skin's resistance to bacterial and fungal infections and may lead to rashes, skin discoloration and blotching. Long-term use of mercury added SLPs may damage the eyes, lungs, kidneys, digestive and immune systems.

Despite health risks, unscrupulous manufacturers add mercury compounds into their formulation of SLPs. Then distributors and retailers, including online platforms such as Amazon, profit from this toxic trade, potentially exposing millions worldwide to this dangerous neurotoxin.

Our recent market surveillance indicates that Amazon.com is now generally in compliance with the U.S. mercury content threshold of 1 part per million (ppm) due to the conditions imposed by a recent legal settlement in California. As part of the legal settlement, Amazon agreed to implement a sales-prevention protocol, or “Suppression Control” rule. This includes implementing compliance control measures designed to block a listing of “Prohibited Covered Products” from being offered for sale on Amazon.com.

Importantly, the “Suppression Control” rule also requires that Third Party Sellers using the Amazon.com platform must first test their products for mercury and other hazardous substances (verified through Amazon approved accredited labs) to ensure that there are no hazardous ingredients in their SLP sales offerings. Third Party Seller compliance requirements also include label verification, a good manufacturing practice certificate, and manufacturing facility registration for listed products. These and other Third Party Seller requirements are now reflected in the Amazon.com Seller Central requirements, but again, only apply in the U.S.

While Amazon.com has implemented a new protective approach designed to eliminate mercury added SLP sales in the U.S., it appears to be in no hurry to do so for the rest of the world. In effect, Amazon and other online platforms have enabled the creation of a black market in plain sight where SLPs intentionally formulated with mercury and other hazardous substances are being sold—without listing the hazards or any other consumer precautions.

By turning a blind eye towards these Third Party Sellers—and the unscrupulous manufacturers who supply toxic SLPs to online marketplaces such as Amazon—this business model allows unsafe products to bypass health, consumer and safety regulations under the guise of legitimate commerce. Through its inaction outside of the U.S., Amazon presents a classic case of double standards through knowingly engaging in the toxic trade of cosmetics containing a dangerous neurotoxin to the rest of the world

Earlier in 2025, ZMWG and its partners in the United States, France, Belgium, India, Mexico and the United Arab Emirates purchased suspect SLPs from Amazon websites in their respective countries. ZMWG partners included: Toxics Link in India, the European Environmental Bureau in Belgium and France, the Mercury Policy Project in the U.S., Casa Cem for Mexico, and an individual collaborator in the United Arab Emirates.

In preparation for the study, listings of SLP brands known to contain mercury from prior testing by governments, civil society, and others were compiled. These served as the basis for conducting market surveillance on Amazon websites in each of the six targeted countries. A total of 31 samples of suspect SLPs were identified, purchased and sent to the lab for testing by the ZMWG partners.

Of the 31 creams purchased, 25 SLPs contained mercury at significantly elevated levels, as indicated in the table below, with an average mercury concentration of close to 14,000 ppm. The highest recorded mercury level was more than 27,000 ppm in the Chandni Whitening Cream purchased on Amazon India. Six of the SLPs were found to contain mercury levels below 1 ppm.

*Table 1: Details of SLPs analyzed for this study*




Brand name	Product name	Country of Amazon Purchase	Mercury content (ppm)	Product photo	Confirmed Mercury Content and/or Legal Violations
4K Plus	Whitening Night Cream	India	19,825		<a href="#">California (US)</a> , <a href="#">Consumers Association Penang</a>
BIOCOS	Goldish Beauty Cream	UAE	25,556		<a href="#">Environmental Investigation Agency</a>
Chandni	Whitening Cream	India	27,431		<a href="#">NY (US)</a> , <a href="#">EU</a> , <a href="#">London (UK)</a> , <a href="#">Bangladesh</a> , <a href="#">US</a>
Collagen Plus	Day & Night Cream	UAE	<1		<a href="#">Philippines</a> , <a href="#">Brunei Darussala</a> , <a href="#">Indonesia</a> , <a href="#">US</a>
Faiza	Beauty Cream	India	15,043		<a href="#">NYC (US)</a> , <a href="#">Bangladesh</a> , <a href="#">London (UK)</a> , <a href="#">EU</a> , <a href="#">Philippines</a> , <a href="#">Pakistan</a> , <a href="#">UAE</a>



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Brand name	Product name	Country of Amazon Purchase	Mercury content (ppm)	Product photo	Confirmed Mercury Content and/or Legal Violations
Fresh & White	Beauty Cream	India; UAE	21,673 – 22,800		<a href="#">Sri Lanka</a> , <a href="#">Philippines</a>
Goldie parley	Beauty Cream	Belgium; France	13,182 – 15,005		<a href="#">NYC (US)</a> , <a href="#">Philippines</a> , <a href="#">EU</a>
Goree	Beauty Cream; Day & Night Beauty Cream	Belgium; UAE; India	14,201 – 25,908		<a href="#">Sri Lanka</a> , <a href="#">NYC (US)</a> , <a href="#">Brunei Darussalam</a> , <a href="#">California (US)</a> , <a href="#">US</a> , <a href="#">Bangladesh</a> , <a href="#">EU</a> , <a href="#">Fiji</a> , <a href="#">Singapore</a> , <a href="#">Canada</a> , <a href="#">Philippines</a> , <a href="#">New Zealand</a> ,
Infocus	Pearl Beauty Cream	India	7,359		<a href="#">NYC (US)</a>
Kanza	Beauty Cream	Belgium, France	<1 – 11,566		<a href="#">NYC (US)</a> , <a href="#">Beautywell (US)</a>
Kanza	Whitening Soap	Belgium	0.6		
La Crema de Rebeca	Master, Crema Facial	Mexico	11,202 – 21,925		<a href="#">California (US)</a> , <a href="#">Sacramento (US)</a>
La Tía Mána	Crema Limpiadora y Curativa	Mexico	5,060		<a href="#">Minnesota (US)</a> , <a href="#">Sacramento (US)</a> , <a href="#">California (US)</a> ,
Nunn Care	Crema limpiadora/ Cleansing cream	Mexico, USA	<0.48 - 6,876		<a href="#">California (US)</a> , <a href="#">Minnesota (US)</a> , <a href="#">Texas (US)</a> ,
Nunn Care	Aqua Serum	Mexico	<1		
Nano Extra White	Whitening Cream with Papaya and Carrot	Belgium, France	7,448 – 8,762		<a href="#">California (US)</a>

Brand name	Product name	Country of Amazon Purchase	Mercury content (ppm)	Product photo	Confirmed Mercury Content and/or Legal Violations
Olifair	Radiant effect night cream	India, Belgium	7,230 – 7,331		<a href="#">Sri Lanka</a>
Rosy Trujillo	Crema Facial Despigmmentante con acido hialuronico	Amazon USA	4,500 – 5,400		
Sandal	Beauty Cream	Amazon India	<1		<a href="#">NYC (US)</a> , <a href="#">EU</a> , <a href="#">US</a> , <a href="#">London (UK)</a> , <a href="#">Philippines</a>

Our findings from mercury added SLPs sampled in Mexico, the United Arab Emirates, and India confirm Amazon's double standard. In these countries, multiple mercury added SLPs are still widely available on Amazon websites, exposing unsuspecting consumers to serious risks. In contrast, only a few mercury-added SLPs were found on Amazon websites in France, Belgium and the U.S., due in large part to the effectiveness of the EU Safety Gate system and the recent settlement in the U.S. respectively.

In summary, this investigation of Amazon websites around the world confirms that mercury added SLPs are still widely available. Outside the U.S., Amazon is demonstrating a double standard that threatens the health and safety of its customers worldwide.

In 2017, Amazon's Director of Worldwide Product Compliance and Safety, indicated on the record during court proceedings that Amazon was "...developing processes to screen global websites or the global Amazon sites for products that are recalled in individual markets". However, it's clear that these internal processes by Amazon have not yet borne fruit.

Following the U.S. settlement—after over a decade of litigation—Amazon clearly understands the hazards involved and the necessary steps to block toxic SLP sales. Nevertheless, Amazon is not yet sufficiently motivated to identify and block illegal mercury added SLPs sales, particularly into the Global South, often claiming that it is not legally responsible. A case in point is the response from Amazon India in 2020 (see Appendix E in the full report), where the responsibility is placed on the Third Party Sellers.

Clearly, toxic SLP sales that are prohibited in stores should also be banned online. Online platforms such as Amazon attract customers to their sites, profit from each sale, dictate the terms of the transactions, control the website, influence the prices, and often distribute the products. Therefore, Amazon platforms worldwide should voluntarily accept full legal responsibility for ensuring that their products fully comply with health, consumer and product safety laws. Anything less is inconsistent with Amazon's claim that it "...strives to be Earth's most customer-centric company, which includes ensuring that every product available for sale is safe."

Finally, ZMWG strongly urges Amazon to apply the same proactive Third Party Seller requirements to the rest of the world that it imposes in the U.S. Specifically, this means requiring independent testing of Third Party Seller SLPs for mercury and other hazardous substance before they can be offered for sale, as well

as adhering to all the other Amazon.com Central seller requirements for SLPs laid out in Appendix A of the full report.

## 2 Introduction

This report documents the ongoing availability of mercury added skin lightening products (SLPs) in many parts of the world, despite a recent legal settlement with Amazon in the United States. The report builds upon previous work of the Zero Mercury Working Group (ZMWG) in exposing the toxic and often illegal trade in mercury added SLPs globally<sup>i</sup> and, in this particular case, sales offerings by Amazon worldwide.

Our market surveillance indicates that Amazon.com is now generally in compliance with U.S. regulations due to the conditions imposed through a recent legal settlement.<sup>ii</sup> However, new ZMWG sampling shows that in other countries Amazon continues to profit from marketing illegal mercury added SLPs.<sup>iii</sup> This includes Amazon's operations in 23 countries with dedicated websites shipping to over 100 countries.<sup>iv</sup>

Mercury lightens the skin by suppressing the production of melanin and can also remove age spots, freckles, blemishes and wrinkles. However, regular use of mercury-added SLPs reduces the skin's resistance to bacterial and fungal infections and may lead to rashes, skin discoloration and blotching. Long-term use of mercury-added SLPs may damage the eyes, lungs, kidneys, digestive and immune systems.

Although the manufacture and trade of mercury added cosmetics have been banned by the Minamata Convention and numerous governments, they continue to be sold through local markets as well as online.<sup>v</sup> Unscrupulous manufacturers often include mercury compounds in the formulation of SLPs.<sup>vi</sup> Then distributors and retailers, including online platforms such as Amazon, profit from selling these toxic mercury added SLPs.

Curtailing online marketing of mercury added SLPs can be daunting, particularly where national sales bans are lacking. Violations of health and safety laws—facilitated by sales on E-commerce websites—not only threaten public health, but also create an uneven playing field since “brick and mortar” stores must comply with domestic laws that may be evaded online.

E-commerce cuts across the boundaries of a country's consumer, health and safety regulations. Unclear division of responsibilities is common in the E-commerce supply chain, with online platforms often claiming exemption from “secondary liability.” Corrective action often occurs only after a documented egregious injury result in a lawsuit.

Moreover, in cases where the third-party seller is located outside the country, the online platform is typically the only option for a consumer seeking legal redress for injuries incurred from using an unsafe product. The same challenge faces regulatory agencies enforcing consumer, health and safety laws.

In effect, Amazon and other online platforms have enabled the creation of a black market where SLPs intentionally adulterated with mercury and other hazardous ingredients are being sold—without listing the hazardous ingredients. By turning a blind eye towards third party sellers/manufacturers that offer toxic SLPs on online marketplaces such as Amazon, this business model allows unsafe products to often bypass health, consumer and safety regulations under the guise of legitimate commerce.<sup>vii</sup>



Although banned by the Minamata Convention, the production and trade in Hg/SLPs often continues unimpeded due to lack of awareness, resources, capacity and enforcement. This lack of accountability removes incentives for online platforms to ensure product safety and results, at best, in episodic efforts to remove illegal products.

Consequently, policymakers and the courts are increasingly challenging the legal framework under which consumers are not well protected.<sup>viii</sup> Online platforms are often not deterred by regulations—unless laws are in place and enforced, allowing legal procedures that can hold them accountable. As described below, that was the basis of the case against Amazon.com in the U.S., which finally settled after a decade-long legal battle.

### 3 Legal case and settlement involving Amazon

As in the case of domestic sales, one would expect that online marketplaces that sell cosmetics would practice due diligence in ensuring that harmful products are not sold on their websites. While E-commerce platforms often argue that they are not legally responsible for third party sales from their websites, courts are increasingly deciding otherwise.<sup>ix</sup> A case in point is the recent settlement with Amazon.com in the U.S. state of California.

Citizen enforcers and the California Attorney General settled with Amazon.com in January 2025, concluding a decade-long citizen-initiated lawsuit seeking to halt the sale of mercury added SLPs. The case was filed under California's Safe Drinking Water and Toxic Enforcement Act (Proposition 65) and California's Unfair Competition Law,<sup>x</sup> and under the settlement Amazon must take specific actions to block the sale of mercury added SLPs.

The settlement followed a California Appellate Court decision holding that Amazon.com is not shielded from liability under Proposition 65 for products sold in California through its website, and the California Supreme Court upheld these findings when it denied Amazon's appeal. This is a significant win: certain SLPs sold on Amazon.com had multiple thousands of times the amount of mercury legally allowed in products in California, and lacked any warning to consumers of that hazard.

Terms of the settlement include Amazon agreeing to cease and desist from facilitating the sale of toxic SLPs identified as "*Prohibited Covered Products*" containing excessive mercury. Prohibited Covered Products involve those included in health alerts by the California Department of Public Health, the U.S. Food and Drug Administration, or the European Union's Safety Gate listing. In addition, even if Prohibited Covered Products are offered for sale on other non-U.S. Amazon online platforms (e.g., amazon.uk), Amazon shall not allow those Prohibited Covered Products to be Offered for Sale in California.<sup>xi</sup>

As part of the settlement, Amazon agreed to pay 6,000,000 USD and implement a sale-prevention protocol, or "suppression rule." This consists of one or more automated rules or compliance controls designed to identify and prevent Prohibited Covered Products from being sold or offered for sale on Amazon.com.<sup>xii</sup>

Amazon also agreed to continuously apply the Suppression Control and, upon discovery of any Prohibited Covered Product, to promptly block sales of the product. After the agreed "Effective Date," Amazon must periodically evaluate the effectiveness of the Suppression Control and modify it as needed to prevent sales

of Prohibited Covered Products on the Amazon.com website. For the first year, Amazon also agreed to evaluate the effectiveness of the Suppression Control at least every two weeks.<sup>xiii</sup>

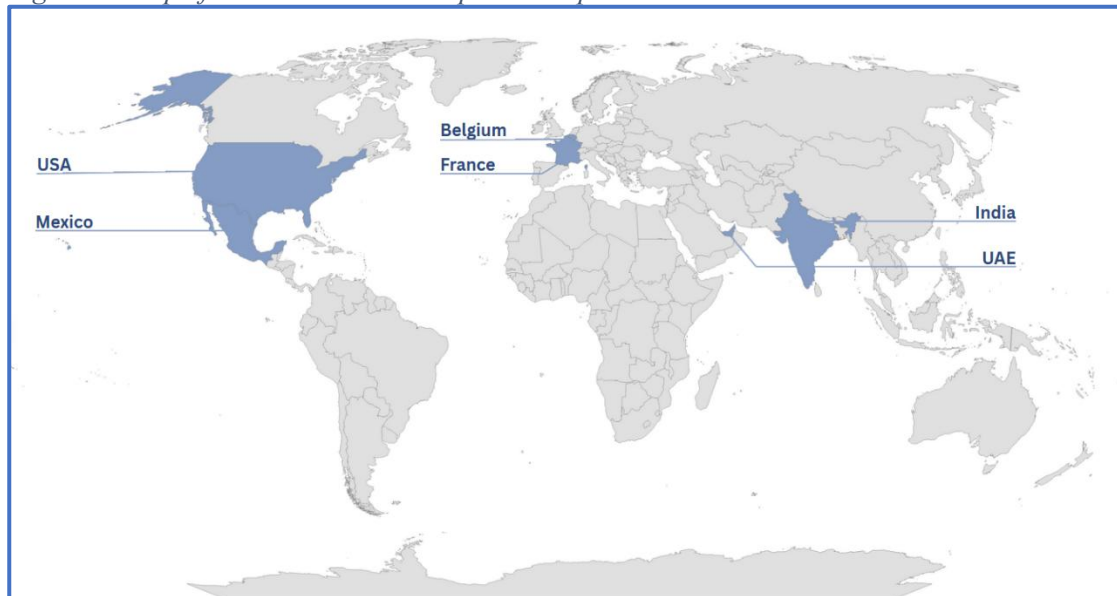
Importantly, “Suppression Control” also includes Amazon requiring Third Party Sellers to first test their products for mercury and other hazardous substances (verified through Amazon approved accredited labs) to ensure that there are no hazardous ingredients in their SLP offerings. Required Third Party compliance also includes label verification, a good manufacturing practice certificate, and manufacturing facility registration for listed products.<sup>xiv</sup> These and other third-party seller requirements are now reflected in the Amazon.com Seller Central requirements (see Appendix A).<sup>xv</sup>

While Amazon has now implemented a protective standard for toxic SLP sales offerings in the U.S., it has so far failed to do so for the rest of the world, presenting a classic case of double standards. As presented in the next section, ZMWG’s most recent sampling of mercury added SLPs purchased on Amazon websites once again confirms that the world’s largest E-commerce platform continues to profit from the toxic cosmetics trade to millions around the world.<sup>xvi</sup>

## 4 Methodology

In 2025, ZMWG and its partners in the United States, France, Belgium, India, Mexico and the United Arab Emirates purchased suspect SLPs from Amazon websites in their respective countries, identified in the map below.

*Figure 1: Map of countries where samples were purchased on Amazon websites*



ZMWG partners in this exercise included Toxics Link for India, the European Environmental Bureau for Belgium and France, the Mercury Policy Project for the United States, Casa Cem for Mexico, and an individual collaborator for the United Arab Emirates.

In preparation for the study, listings of SLP brands known to contain mercury from prior testing by governments, civil society, academic research and others were referenced. These served as the basis for

conducting market surveillance on Amazon in each of the selected countries. Suspect SLPs were identified, purchased and sent to the following laboratories for testing by the ZMWG partners:

- The samples purchased in France, Mexico, UAE, Belgium and India were analyzed by the Quality Assurance and Control Systems (QACS) laboratory in Athens, Greece. The laboratory used a Perkin Elmer Analyst TM 800 AAS (see methodology in Appendix C).
- SLPs purchased in the United States were analyzed by the Legend Technical Services Laboratory in St. Paul, Minnesota, using ICP-OES (see methodology in Appendix D).

## 5 Results

### 5.1 Availability of target SLPs

A total of 31 samples were purchased in the six countries listed above, and sent to the lab. Table 2 identifies the country of purchase, the Amazon domain name, the brand name, the mercury content and the number of SLPs purchased in each country. In some cases (France, US, Mexico), several products from the same brand have been purchased.

Table 2: Summary of SLPs purchased for analysis

Country of purchase	Amazon domain name	Brand name	Mercury content (in ppm)	Number of products purchased
India	amazon.in	Faiza, Fresh & White, Infocus, 4K Plus, Goree, Sandal, Olifair, Chandni	<1 - 27,431	8
Belgium	amazon.com.be	Goldie Parley, Goree, Kanza, Nano Extra White	<1 - 23,562	6
France	amazon.fr	Kanza, Nano Extra White, Goldie Parley	8,762 - 13,182	3
United Arab Emirates	amazon.ae	Goree, Fresh & White, Collagen Plus, BIOCOS	<1 - 25,908	4
United States	Amazon.com	Nunn Care, Rossy Trujillo	<0.48 – 5,400	4
Mexico	amazon.com.mx	La Tía Mána, La Crema de Rebeca, Nunn Care	<1 - 21,925	6

The full lab tested SLP sampling results are available in Appendix B, listed in alphabetical order per brand name.

### 5.2 Key findings

The testing of these samples confirmed that mercury added SLPs remain widely available on Amazon websites around the globe. Many of these mercury added SLPs have been previously flagged as dangerous or illegal by governments and previous ZMWG testing, as may be seen in Table 1 in the Executive Summary and also in the easily searchable ZMWG database.<sup>xvii</sup>

Of the 31 creams purchased, 25 SLPs contained mercury at significantly elevated levels, with an average mercury concentration of close to 14,000 ppm. The highest recorded level was more than 27,000 ppm in the Chandni Whitening Cream purchased in India. Six of the SLPs were found to contain mercury levels below 1 ppm.




The findings from SLPs sampled in Mexico, the United Arab Emirates, and India clearly highlight Amazon's double standard. In these countries, mercury-added SLPs are still readily available on Amazon websites, exposing unsuspecting consumers to serious risks.


In contrast, based on recent market surveillance, Amazon.com in the U.S. has significantly reduced the availability of mercury-added SLPs to the point where they are now almost non-existent, compared to the ZMWG report issued in 2023.<sup>xviii</sup>

Nevertheless, two different SLPs were recently purchased from Amazon.com in the U.S. and found to contain concentrations of mercury in violation of the U.S. Food & Drug Administration's 1 ppm threshold.<sup>xix</sup> Consistent with the Settlement Agreement with the California Attorney General, Amazon is obligated to remove those illegal products and pay for the costs of sampling and lab testing. However, while Nunn Care cream has been removed, the Rossy Trujillo cream is still available on Amazon.com as of mid-September 2025. This indicates that Amazon.com has yet to fully enforce its new seller requirements, including lab testing for mercury and other hazardous substances by all third-party sellers, before those products can be offered for sale (see Appendix A.)

The brand name, Rossy Trujillo, is advertised on Amazon.com as "Same Creators of The TIA MANA CREAM." TIA MANA CREAM has been found to contain mercury on numerous occasions by ZMWG and several governments, as seen in the ZMWG searchable database.<sup>xx</sup> It is also among the SLPs purchased in Mexico in this sampling round, as seen above.

*Table 3: Summary of SLPs purchased in the U.S.*

Brand name	Product name	Mercury concentration (ppm)	Origin (as per packaging)	Product Photo
Nunn Care (generic)	Cleansing Cream for Face and Neck	3,400	Mexico	
Nunn Care (generic)	Cleansing Cream	<0.48	Mexico	
Rossy Trujillo	Crema Facial Despigmmentante con acido hialuronico	5,400	Mexico	

Brand name	Product name	Mercury concentration (ppm)	Origin (as per packaging)	Product Photo
Rossy Trujillo	Crema Facial Despigmantante	4,500	Mexico	

SLPs were also purchased on Amazon websites in Belgium and France. However, due to the effectiveness of the EU Safety Gate system and the European Commission's Voluntary Product Safety Pledge, the number of offerings remain somewhat limited in the EU member states.<sup>xxi</sup> That said, the EU still relies on reactive tools, i.e., once dangerous products are reported, they are removed, but proactive mechanisms to prevent them from being listed in the first place appear to be inadequate. The European Commission Product Safety Pledge should therefore be strengthened to include a proactive commitment similar to what is required of Amazon.com in the U.S. (see Appendix A.)

In terms of prevention, it is important to note that third party sellers may use different names (or no name) and altered packaging in an attempt to avoid an online platform's automatic screening tools, while also misleading the user.

## 6 Summary and conclusion

This investigation of suspect SLPs offered for sale by Amazon around the world confirms that mercury added SLPs are still widely available on their websites. Outside the U.S. Amazon is demonstrating a double standard that threatens the health and safety of its customers worldwide.

Following the U.S. settlement after over a decade of litigation, Amazon clearly understands the necessary steps to block toxic SLP sales. Nevertheless, it is apparently not sufficiently motivated to identify and take down illegal mercury added SLPs sold via its websites in 23 countries, with products shipped to over 100 countries. For example, see the response from Amazon India in 2020 in Appendix E, where they seek to place all responsibility on the third party seller.<sup>xxii</sup>


Toxic SLP sales that are prohibited in stores should also be banned online. Platforms such as Amazon.com attract customers to their sites, profit from each sale, dictate the terms of the transactions, control the website, influence the prices, and often distribute the products. Therefore, Amazon platforms worldwide should accept their corporate responsibility for ensuring that products fully comply with health and safety laws. Anything less is inconsistent with Amazon's claim that it "...strives to be Earth's most customer-centric company, which includes ensuring that every product available for sale is safe."<sup>xxiii</sup>

Finally, ZMWG strongly urges Amazon to apply the same proactive third-party seller requirements to the rest of the world that it imposes in the U.S. Specifically, this means requiring independent testing of third-party products for mercury and other hazardous ingredients before they can be listed, as well as adhering to all the other Amazon seller requirements for SLPs laid out in Appendix A.



## Appendix A – Amazon seller central – Skin-lightening products

Source: [https://sellercentral.amazon.com/help/hub/reference/external/GC37KSM44NPNZED6?ref=efph\\_XMGGPL](https://sellercentral.amazon.com/help/hub/reference/external/GC37KSM44NPNZED6?ref=efph_XMGGPL)



This article applies to selling in: **United States**

[Seller Central Help](#) > [Policies, agreements, and guidelines](#) > [Program Policies](#) > [Selling on Amazon fee schedule](#) > [Category, product, and listing restrictions](#) > [Product compliance](#) > [Skin-lightening products](#)

If you list products on Amazon, you must comply with all applicable laws, regulations, standards, and our policies related to those products and product listings.

### A1 – Our policy for skin-lightening products

Skin-lightening products include, but are not limited to, bleaching creams, whiteners, skin brighteners, and fading creams. The products are usually marketed as skin lighteners and anti-aging treatments that remove age spots, freckles, blemishes, and wrinkles.

Some skin-lightening products have been found to contain mercury. Exposure to mercury can have serious health consequences. Amazon prohibits all skin care products that contain mercury or its equivalents, including but not limited to: mercuric, mercuric amidochloride, mercury oxide, mercury salts, mercurous chloride, mercurio, calomel, cinnabaris, hydrargyri oxydum rubrum, and quicksilver. Skin care products that contain mercury are prohibited for sale on Amazon.

### A2 – Applicable laws, regulations, and standards

Amazon requires that all skin-lightening products have been tested and comply with the regulations, standards, and requirements listed below:

Product	Laws, regulations, and standards
Skin-lightening products	<p>All of the following:</p> <ul style="list-style-type: none"><li>Federal Food, Drug, and Cosmetic Act of 1938,</li><li>Modernization of Cosmetics Regulation Act of 2022 (MoCRA)</li><li>21 CFR 701 (Cosmetic labeling – General provisions)</li><li>21 CFR 740 (Cosmetic Product Warning Statements)</li></ul>

### A3 – Amazon compliance requirements for products that you can sell under our policy

You must fulfill the following compliance requirements listed below:

Requirements	Product detail page	Compliance information
Documents		Required
Images		Required

**A4 – Compliance information**

You must submit the following compliance documents and images listed below:

**Documents**

- Test reports from an ISO 17025-accredited laboratory demonstrating that the product complies with the following:
  - NSF 527 (Personal Care Product Certification)
- GMP (Good manufacturing practices) certificate demonstrating that the product complies with:
  - For Cosmetics: ISO 22716:2007 (Cosmetics - Good Manufacturing Practices (GMP) - Guidelines on Good Manufacturing Practices) or equivalent, such as NSF/ANSI 455-3 (Good Manufacturing Practices for Cosmetics), ASEAN Cosmetic Directive, Korea cGMP. FDA inspections are not considered as valid evidence of cGMP compliance. For more information on this specific policy and our requirements, go to [Cosmetics and Skin and hair care](#)
  - For drugs: 21 CFR 210 (Current Good Manufacturing Practice in Manufacturing, Processing, Packing, or Holding of Drugs; General), 21 CFR 211 (Current Good Manufacturing Practice for Finished Pharmaceuticals) or equivalent, such as NSF/ANSI 455-4 (Good Manufacturing Practices for Over-the-Counter Drugs), or FDA or EU Regulatory inspections from past 24 months. For more information on this specific policy and our requirements, go to [Drugs and drug paraphernalia](#).
- FDA Form 5066 and FDA form 5067 reflecting product and facility registration in FDA Direct Database in compliance with MoCRA (Modernization of Cosmetics Regulation Act of 2022). Screenshots of the database listings are allowable.

**Images**

- Product labels laboratory demonstrating that the product complies with the following:
  - For Cosmetics: 21 CFR 701 (Cosmetic labeling – General provisions) and 21 CFR 740 (Cosmetic Product Warning Statements). For more information on this specific policy and our requirements, go to [Cosmetics and Skin and hair care](#) .
  - For drugs: 21 CFR 352 (Sunscreen drug product for over-the-counter human use). For more information on this specific policy and our requirements, go to [Drugs and drug paraphernalia](#).

When you submit documentation and images, ensure the following:

- Documentation is not from a [Temporarily suspended validation lab](#)
- All documents, test reports, or certificates provided to Amazon must be authentic and in their original, unmodified format

- Product instructions, manuals, safety information, labels, and warnings are in the language of the intended country of sale
- Images demonstrate that the product is the same as the product tested and listed on the product detail page
- Images must show all sides of a product or its packaging
- If the product is a set or bundle, provide separate images for each product included in the set or bundle

**Note:** Provide clear and legible documentation and images to help reduce the possibility of delays in the approval process.

Customer safety is our top priority. We reserve the right to ask for additional information to verify product safety and compliance at any time.

#### **A5 – Submit compliance information or an appeal**

You must verify that your product complies with the applicable regulations, standards, and requirements listed above through a third-party testing, inspection, and certification (TIC) service provider on an annual basis. To initiate testing or a document verification request, or to submit an appeal, go to [Third-party testing, inspection, and certification services](#).

#### **A6 – Policy violations**

If you don't provide the required information (listed above) upon request, we reserve the right to take any further actions in accordance with the Amazon Services Business Solutions Agreement, including, but not limited to, removing the relevant product listings.

#### **A7 – Visual aids**

To learn more, watch our video: [Skin Lightening products policy and compliance](#)



If you are unable view the video on YouTube, you can watch our video in Chinese on [WeChat](#).

#### A8 – Resources

- [Amazon Services Business Solutions Agreement](#)
- [Remove inventory overview](#)
- [Fix stranded inventory](#)
- [Restricted products](#)
- [Service Provider Network](#)

#### A9 – Additional resources

- [ISO 17025 International Organization for Standardization](#)
- [Accredited certifying body](#)
- [ISO 22716:2007](#)
- [Skin facts! What you need to know about skin-lightening products](#)
- [Mercury poisoning linked to skin products](#)

**Disclaimer:** The information provided on this page does not and is not intended to constitute legal advice. All information, content, and materials available on this site are for general informational purposes only. For questions about the laws and regulations concerning your listing, we encourage you to consult with your legal counsel.

Last updated: July 8, 2025

## Appendix B – ZMWG list of suspect SLPs tested in this study

*Hg/SLPs purchased for this study*

Brand	Name	Purchased in	Platform	Mercury content (ppm)	Listed origin	Product Picture	ASIN number
Goldie Parley	Beauty Cream	Belgium	amazon.com.be	15,005.00	Pakistan		B0C5RSYM7D
Goree	Beauty Cream	Belgium	amazon.com.be	23,562.00	Pakistan		B0CB4BR9JJ
Kanza	Beauty Cream	Belgium	amazon.com.be	<1	Pakistan		B07QYK56WS
Kanza	Whitening Soap	Belgium	amazon.com.be	0.60	Pakistan		B07QYK56WS
Nano Extra White	Face Cream	Belgium	amazon.com.be	7,448.00	India		B0DGDB1HSD
Olifair	Night Cream	Belgium	amazon.com.be	7,331.00	Thailand		B07M6HGGMV
Kanza	Beauty Cream	France	amazon.fr	11,566.00	Pakistan		B07QRSZW61
Nano Extra White	Face Cream	France	amazon.fr	8,762.00	Pakistan		B0DGDB1HSD
Goldie Parley	Beauty Cream	France	amazon.fr	13,182.00	Pakistan		B0C5RSYM7D



# Poisoning for Profit: Amazon's Double Standard

October 2025

Brand	Name	Purchased in	Platform	Mercury content (ppm)	Listed origin	Product Picture	ASIN number
Faiza	Beauty Cream	India	amazon.in	15,043.00	Bangkok, Thailand		B0DS11N1YG
Fresh & White	Beauty Cream	India	amazon.in	21,673.00	Pakistan		B0C8Q9QVWY
Infocus	Pearl Beauty Cream	India	amazon.in	7,359.00	Pakistan		B0C9W4BRLR
4K Plus	Whitening Night Cream	India	amazon.in	19,825.00	Not mentioned		B0D5YZYRH
Goree	Day & Night Beauty Cream	India	amazon.in	14,201.00	Pakistan		B0CLTQ7SJK
Sandal	Beauty Cream	India	amazon.in	<1	Pakistan		B0DPXTWS8G
Olifair	Radiant effect night cream	India	amazon.in	7,230.00	India		B01LX1KQSU
Chandni	Whitening Cream	India	amazon.in	27,431.00	Pakistan		B0DW5CLK8R
La Tía Mána (genérico)	Crema Limpiadora y Curativa	Mexico	amazon.com.mx	5,060.00	Mexico		B0DJQ4BY4N

**Poisoning for Profit: Amazon's Double Standard**

October 2025

Brand	Name	Purchased in	Platform	Mercury content (ppm)	Listed origin	Product Picture	ASIN number
La Crema de Rebeca (genérico)	Master	Mexico	amazon.com.mx	15,999.00	Mexico		B0DV8XJRNK
La Crema de Rebeca (genérico)	Crema facial	Mexico	amazon.com.mx	21,925.00	Mexico		B0C5P9YX54
La Crema de Rebeca (genérico)	Crema facial	Mexico	amazon.com.mx	11,202.00	Mexico		B0D123VX47
Nunn Care (genérico)	Crema limpiadora	Mexico	amazon.com.mx	6,876.00	China		B0F3V1P8G7
Nunn Care (genérico)	Aqua Serum	Mexico	amazon.com.mx	<1	Mexico		B0F3V1P8G7
Goree	Day & Night Beauty Cream	United Arab Emirates	amazon.ae	25,908.00	Designed in Korea		B0F53QYXZG
Fresh & White	Beauty Cream	United Arab Emirates	amazon.ae	22,800.00	Not Mentioned		B0C19CRCVD
Collagen Plus	Day & Night Cream	United Arab Emirates	amazon.ae	<1	Not Mentioned		B095J1T733
BIOCOS	Goldish Beauty Cream	United Arab Emirates	amazon.ae	25,556.00	Pakistan		B0DN9R5PT4

## Poisoning for Profit: Amazon's Double Standard

October 2025

Brand	Name	Purchased in	Platform	Mercury content (ppm)	Listed origin	Product Picture	ASIN number
Nunn Care (generic)	Nunn cleansing cream for Face and Neck	United States of America	amazon.com	3400	Mexico		B0RH44ZSPK;
Nunn Care (generic)	nunn cleansing cream	United States of America	amazon.com	<0.48	Mexico		B0FD3XQ5YB
Rosy Trujillo	Crema Facial Despigm entante	United States of America	amazon.com	5400	Mexico		B0BBT1WSQX
Rosy Trujillo	Crema Facial Despigm entante	United States of America	amazon.com	4500	Mexico		B09M47Q1HN

## Appendix C – Laboratory methodology QACS

The determination of mercury was assessed with atomic absorption spectrometry. The apparatus was a Perkin Elmer AAnalyst™ 800 Atomic Absorption Spectrometer; equipped with a 4-inch burner head, mercury electrodeless discharge lamp (EDL). FIAS 100 Flow Injection Analysis System for Hydride generation with a quartz cell.

### 1. Parameter settings Hg:

- I. Wavelength 253.7 nm
- II. Lamp current 185.0 mA
- III. Silt 0.7 nm High Slit

### 2. FIAS:

- I. FIAS flow (Argon) 100 ml / min.
- II. Carrier solution 3 % (v/v) HCL
- III. Reducing agent 0.2 % NaBH<sub>4</sub> in 0.05% NaOH
- IV. Sample loop 500 µl
- V. Read time 20s

### Sample preparation

Accurately weigh, to the nearest mg, 0.35 – 0.50 g of sample into a high-pressure resistance PTFE-TFM microwave digestion vessel. Avoid contact with the side of the vessel. Add 8 ml trace grade nitric acid, 1ml of trace grade hydrogen peroxide by using a graduated pipette. If samples contain talcum or pigment add 1ml of trace grade hydrochloric acid.

Close the vessel lid. Leave for about 15 minutes to ensure complete reaction. Digest in microwave digestion system at the specified program (Organic B).

After the digestion procedure has completed, allow the vessel to cool to room temperature before opening and the sample is transferred into a 50 ml volumetric flask and dilute with distilled water. If necessary, additional dilutions can be performed after this step, to bring the concentration of Mercury within the calibration range. 10 ml of the sample solution is transferred into a 20 ml volumetric flask, 0.2 ml of HCl 37% for trace metal and one to two drops of a 5% solution of KMnO<sub>4</sub> are added and the sample is diluted to volume with water.

### Standard preparation

Prepare a working stock solution by dissolving 1 ml of the Mercury standard solution 1000mg/L±4mg/L into a 100 ml volumetric flask, dilute to volume with water to give solution A (Hg 10ppm). 1.0 mL of the solution A are transferred into 100 mL volumetric flask and diluted to volume with water to give Solution B (Hg: 100 ppb). 0.1, 0.2, 1.0 and 2.0 ml of the working stock are transferred into 20 ml volumetric flasks. Then 10 ml water are added, followed by 0.2 ml HCl 37% for trace metal and one to two drops of a 5% solution of KMnO<sub>4</sub>, the standards are diluted to volume with water.

### Blank preparation

Into a 20 ml volumetric flask is placed 15 ml water, 0.5 ml of HCl 37% and one to two drops of 5 % KMnO<sub>4</sub> added and the blank is diluted to volume with water.

## Appendix D – Laboratory methodology legend

### 1. Type of Instrument

The instrument used for the mercury analysis was an Agilent 5100 ICP-OES (inductively coupled plasma atomic emission spectroscopy).

### 2. Sample Preparation

1. Weigh out 1g of sample, record weight, and transfer to a pre-labeled digestion vessel;
2. For one sample per batch, weigh out two additional aliquots, one for the MS and one for the MSD;
3. Add 0.125 mL of spike solution to the LCS, LCSD, MS, and MSD;
4. Add 5 mL of 1:1 HNO<sub>3</sub> to all samples, swirl, and cover with a plastic watch glass;
5. Transfer samples in the holding racks to the hotblock digester and reflux for approximately 15 minutes without boiling;
6. Allow the samples to cool, then add 2.5 mL of concentrated HNO<sub>3</sub> and reflux for 30 minutes at 95°C +/- 5°C. Repeat this step until no brown fumes are given off by the samples;
7. Heat sample to a volume of about 5 mL or for 2 hours at 95°C +/- 5°C. Do not allow the samples to boil or go dry. Record the time samples are placed on the hotblock digester;
8. Add 5 mL of concentrated HCl to each sample and cover with a plastic watch glass. Reflux at 95°C +/- 5°C for 15 minutes;
9. After cooling finalize all samples up to 50 mL with DI water using the graduations on the digestion vessels
10. Cap all samples and invert to mix.

### 3. Storage

The samples were stored in a room at 20-25°C in a secured location before sample preparation.

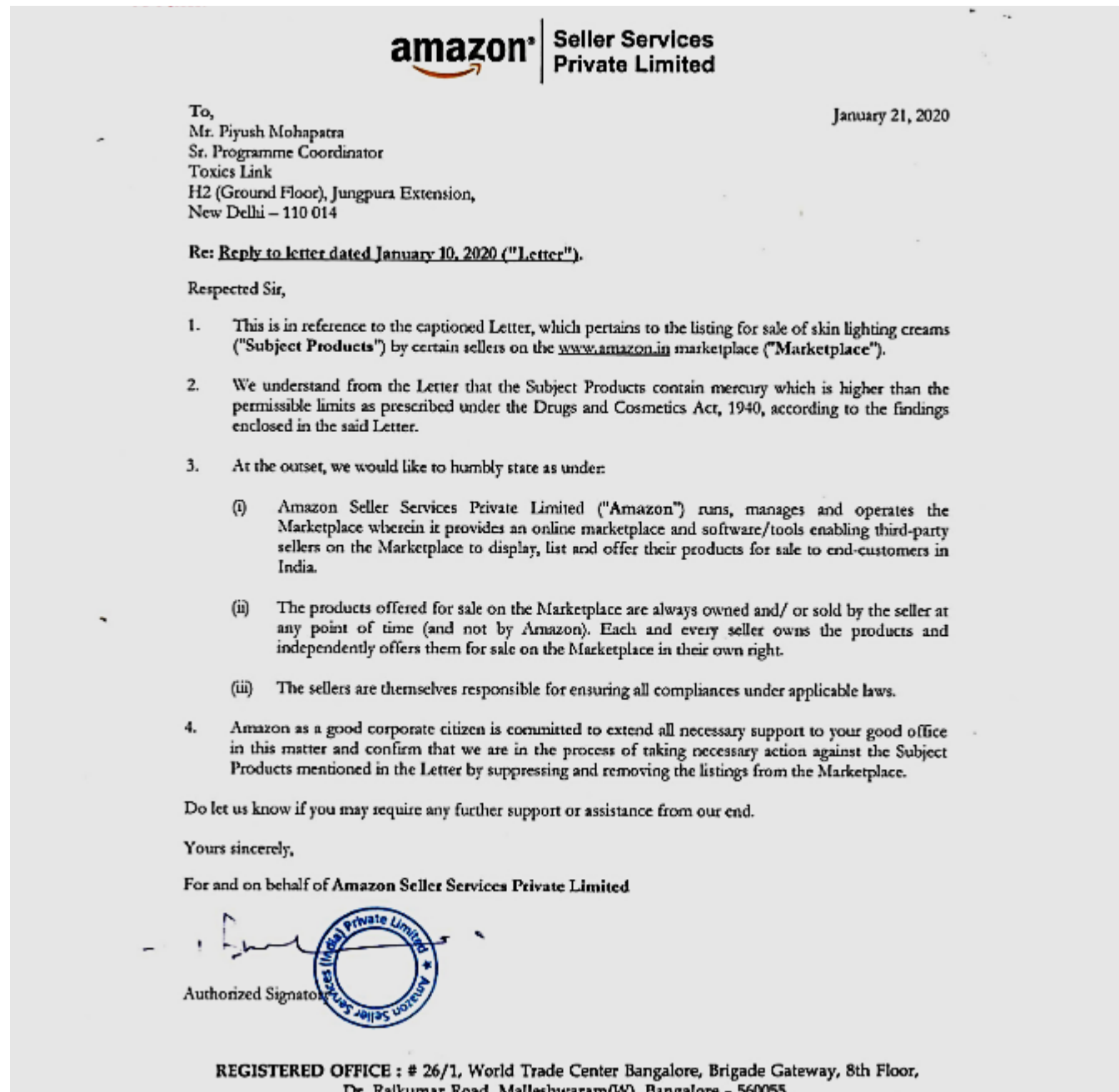
### 4. Analysis

The analysis results were then uploaded to the lab's LIMS data management system.



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## Appendix E – Amazon India letter to Toxics Link



## Endnotes

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<sup>i</sup> <https://www.zeromercury.org/mercury-added-skin-lightening-creams-campaign/>

<sup>ii</sup> <https://oag.ca.gov/news/press-releases/attorney-general-bonta-announces-nearly-600k-settlement-amazon-resolving>

<sup>iii</sup> <https://sell.amazon.com/global-selling>

<sup>iv</sup> <https://expertbeacon.com/how-many-countries-does-amazon-operate-in/>

<sup>v</sup> <https://www.fda.gov/consumers/consumer-updates/mercury-poisoning-linked-skin-products>

<sup>vi</sup> <https://eia.org/report/mercury-in-retrograde/>

<sup>vii</sup> <https://www.asyousow.org/press-releases/amazon-sued-mercury-skin-lightening-creams>

<sup>viii</sup> <https://apps.who.int/iris/bitstream/handle/10665/330015/WHO-CED-PHE-EPE-19.13-eng.pdf?sequence=1&isAllowed=y>

<sup>ix</sup> <https://www.asyousow.org/press-releases/2022/3/14/california-court-rules-amazon-must-protect-consumers;>  
<https://www.courttv.com/news/court-amazon-customers-can-sue-over-lack-of-toxic-warnings/>

<sup>x</sup> The underlying statute, California's 1986 Safe Drinking Water and Toxic Enforcement Act, Health & Safety Code 25249.5, states: "No business shall knowingly or intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving a clear and reasonable warning." Mercury is included in the list of toxic substances covered by the law.

<sup>xi</sup> <https://oag.ca.gov/system/files/attachments/press-docs/Complaint%20for%20Injunctive%20Relief%20and%20Civil%20Penalties.pdf>

<sup>xii</sup> [https://sellercentral.amazon.com/help/hub/reference/external/GC37KSM44NPNZED6?ref=efph\\_XMGGPL6LC4CVXHT\\_bred\\_GV9VZ5A7PJZQYRFF&locale=en-US](https://sellercentral.amazon.com/help/hub/reference/external/GC37KSM44NPNZED6?ref=efph_XMGGPL6LC4CVXHT_bred_GV9VZ5A7PJZQYRFF&locale=en-US)

<sup>xiii</sup> <https://oag.ca.gov/system/files/attachments/press-docs/Complaint%20for%20Injunctive%20Relief%20and%20Civil%20Penalties.pdf>

<sup>xiv</sup> <https://oag.ca.gov/system/files/attachments/press-docs/Complaint%20for%20Injunctive%20Relief%20and%20Civil%20Penalties.pdf>

<sup>xv</sup> [https://sellercentral.amazon.com/help/hub/reference/external/GC37KSM44NPNZED6?ref=efph\\_XMGGPL6LC4CVXHT\\_bred\\_GV9VZ5A7PJZQYRFF&locale=en-US](https://sellercentral.amazon.com/help/hub/reference/external/GC37KSM44NPNZED6?ref=efph_XMGGPL6LC4CVXHT_bred_GV9VZ5A7PJZQYRFF&locale=en-US)

<sup>xvi</sup> <https://www.zeromercury.org/mercury-added-skin-lightening-creams-campaign/>

<sup>xvii</sup> <https://www.zeromercury.org/projects/mercury-added-skin-lightening-creams-campaign-database/>

<sup>xviii</sup> <https://www.zeromercury.org/wp-content/uploads/2023/02/Prime-Time-Illegal-Mercury-Products-Report-2023.pdf>

<sup>xix</sup> <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-G/part-700/subpart-B/section-700.13>

<sup>xx</sup> <https://www.zeromercury.org/projects/mercury-added-skin-lightening-creams-campaign-database/>

<sup>xxi</sup> Due to a variety of challenges, countries are banding together to control illegal Hg/SLP sales. For example, the European Union (EU) Safety Gate System (previously called RAPEX) restricts the supply of dangerous products, including cosmetics such as SLPs. According to the latest data published in 2025, cosmetics remain the number one product category on Safety Gate in recent years. To help national market surveillance authorities monitor online platforms, the European Commission has also developed a 'web crawler tool' to ensure that unsafe products flagged on Safety Gate do not reappear on e-commerce websites. In parallel, under the voluntary Product Safety Pledge +, Amazon has publicly stated that it uses automated filters—at least within the EU—to prevent such flagged products from resurfacing on its platform. A similar alert system is in place in Southeast Asia, and the Organization for Economic Cooperation and Development has a *GlobalRecalls* portal which includes Hg/SLPs. Other examples of government coordination can be found in the 2019 ZMWG report.

<sup>xxii</sup> Toxics Link, 2020, Presence of mercury in skin whitening creams, Annex II, <https://toxicslink.org/wp-content/uploads/2022/08/MERCURY%20IN%20SKIN%20WHITENING%20CREAM.pdf>

<sup>xxiii</sup> <https://www.aboutamazon.com/news/policy-news-views/how-amazon-is-improving-product-safety>