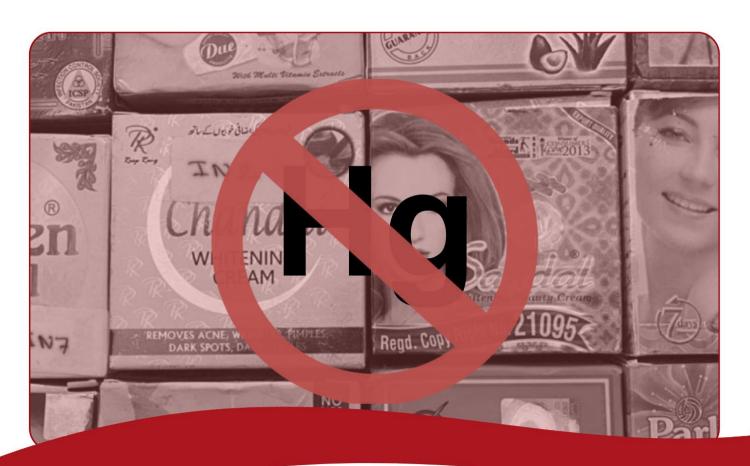
# **Zero Out Toxic Production**

End the unscrupulous manufacturing of mercury added skin whiteners

October 2025





#### October 2025

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## **Executive Summary**

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 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 demonstrated 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 represents 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

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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 (in Table 1 and <u>Annex F</u> of this report) 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.

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 <u>one million USD per year</u>.

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 25<sup>th</sup>, 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.

## 1.Introduction

Recent testing has once again confirmed that mercury-added skin whitening creams (Hg/SWCs) continue to be manufactured and exported, placing millions of consumers at risk. Many of these Hg/SWCs have already been identified by governments across the globe as exceeding the legal limit, as indicated in the Zero Mercury Working Group (ZMWG) database. This report presents a case study of the challenges faced by one of the more important Hg/SWC manufacturing countries, Pakistan.

Mercury and mercury compounds lighten the skin by suppressing the production of melanin and can remove age spots, freckles, blemishes and wrinkles. According to multiple studies, the use of hazardous Hg/SWCs often results in adverse health effects as such products may lead to rashes, skin discoloration and blotching. Long term use may damage the eyes, lungs, kidneys, and digestive and immune systems.

An indicator of the widespread use of Hg/SWCs in Pakistan is the prevalence of skin damage and other clinical health issues.<sup>iv</sup> The Sustainable Development Policy Institute (SDPI) conducted surveys of dermatologists, first in 2016 and again in 2023, to gauge the impact of and opinions on the use of SWCs. During the most recent survey, dermatologists indicated that nearly 90% of patients were not aware of toxic ingredients in SWCs, and that over 60% of patients reported facial skin problems.<sup>v</sup>

The Minamata Convention on Mercury and numerous governments ban the manufacture and trade of mercury-added cosmetics due to health risks. While many countries prohibit the manufacture and trade of these products, these remain available online and in local markets, both sold abroad and locally. Figure 1 provides some indication of where Hg/SWCs may be manufactured, based on country-of-origin packaging information from creams included in the ZMWG database.

Pakistan's Minamata Initial Assessment (MIA) in 2019 reported that Hg/SWCs were manufactured and "widely used both in rural and urban areas" by men and women, vi while a 2021 paper published in *Clinical, Cosmetic and Investigational Dermatology* confirmed that recent years had seen an exponential surge in cosmetic use in Pakistan. vii

While yet to be officially confirmed, this report presents a partial listing of manufacturers around the globe believed to

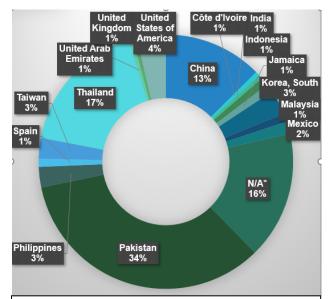


Figure 1: Countries manufacturing mercuryadded skin whitening creams from samples within the ZMWG database.

Source: Zero Mercury Working Group https://www.zeromercury.org/projects/mercuryadded-skin-lightening-creams-campaigndatabase/

be producing Hg/SWCs. This listing could serve as a starting point for verification by host countries, the Minamata Convention and other relevant organizations.

Worldwide, it is estimated that 66 million Hg/SWCs are manufactured each year containing over 110 metric tons of mercury compounds. This estimate is derived from sales projections from

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only one major Pakistani manufacturer, although research and reports indicate that there are several major manufacturers of Hg/SWCs in the country.<sup>ix</sup>

Further, a recent investigation revealed that it is standard practice to manufacture Hg/SWCs consisting of 3-4% mercury compound (often ammoniated mercury). Manufacturers from several countries confirmed that they add mercury compounds to their SWCs because "without it the product is useless."

Several Parties to the Minamata Convention with major SWC manufacturing facilities have yet to adopt the necessary legislation to ban illegal production and/or enforce relevant regulations. As one example, in Pakistan the import of mercury and mercury compounds has been restricted since 2016, allowing limited use only for industrial purposes, according to the Pakistani regulation. Yet this regulation has not been adequately enforced, thereby allowing manufacturers to continue producing toxic and dangerous Hg/SWCs. According to a Pakistani official, strict control is needed.xi

In 2017, the Pakistan Standards and Quality Control Authority (PSQCA) adopted standards for cosmetics including PS 3228-2017 for skin creams, prohibiting the intentional addition of mercury and its compounds.xii A rigorous certification process was to have been requiredxiii before a skin cream could be placed on the market, including inspection of the manufacturing facility and product testing in a PSQCA-approved laboratory.

In 2019, the former Minister of State for Climate Change, Zartaj Gut, raised concerns that manufacturers were jeopardizing the health of young girls by selling toxic skin whiteners. \*\*iv PSQCA also issued a "Public Notice for General Awareness and Action against Skin Cream Manufacturers," Karachi, Sindh (PSQCA, 2017/Annex 4), confirming that mercury-added cosmetics were prohibited, and requesting once again that manufacturers register/certify their products (Annex I).

Although no follow-through appears to have taken place since then, most recently, the Competition Commission of Pakistan 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."<sup>XV</sup>

Despite a range of discussions, relevant national regulations and other efforts, and as evidenced by the latest round of sampling outlined in this report, the production and worldwide distribution of mercury-added SWCs continues relatively unimpeded. In some cases, this is due to inadequate 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 issue.

# 2. Testing of suspect Hg/SWCs

The results of testing of suspect SWCs from Pakistani manufacturers are presented below. Sampling was conducted by ZMWG partners including the Sustainable Development Policy Institute (SDPI) in Pakistan, Ban Toxics in the Philippines, the Centre for Environmental Justice and Development (CEJAD) in Kenya, and the Mercury Policy Project and We Act in the United States.

## 2.1 Methodology and scope

This investigation targeted six different brands of SWCs suspected of containing mercury. These products, with their packaging labels indicating they were manufactured in Pakistan, are detailed in <u>Annex A</u>. They have repeatedly tested positive for mercury in previous sampling efforts<sup>xvi</sup> and

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have appeared on numerous national authorities' alerts, detention, hazardous products or advisory watchlists, portals and/or websites.

ZMWG partners assessed the availability of these target products on e-commerce platforms. A total of 37 samples were purchased in 2024 by NGOs across four countries—Pakistan, the Philippines, Kenya, and the United States—with two different approaches:

- Pakistan: Products were sourced from a variety of channels, including one online platform (Daraz), official brand e-shops, one social media platform (Facebook), and local markets. This approach was designed to demonstrate the wide availability of these illegal products across multiple sales channels, including the purchase from the official brand e-shop (indicating that the product was not counterfeit).
- Philippines, Kenya: Product purchases were limited to online platforms including Jiji, Jumia and Kilimall for Kenya, and Shopee and Lazada for the Philippines
- United States: Products were purchased on two relatively small online platforms, Aleena Cosmetics and Axabee Skincare. These are located just outside New York City and have been offering across the U.S. many of the same products that the New York City Department of Health and Mental Hygiene (NYC DoH) has been warning about. Some of the Hg/SWCs identified through ZMWG testing have also been listed on the U.S. Food & Drug Administration detention list for several years. These are illustrated in the table below.

Probably not coincidentally, there is also a <u>Facebook page</u> named "<u>Aleena cosmetics</u>" located in Karachi, Pakistan, suggesting a potential direct connection between the online distribution in the U.S. and the manufacturer in Pakistan. The instructions for a consistent and uniform sampling of these SWCs can be found in <u>Annex B</u>.

Figure 2: Hazardous mercury-added SWCs on Axabee/Aleena websites (We Act)

#### Hazardous HgSLPs Listed on Axabee/Aleena Websites Axabee Skincare Aleena Cosmetics Country of Product Name Measurement Product Listing Product Listing Manufacture (ppm mercury) (ppm mercury) Goree Beauty Cream With Paki stan <u>Axabee</u> Aleena 17,200 18,000 Lycopene Golden Pearl Beauty Cream Axabee Aleena 17 200 11 000 Pakistan Sandal Whitening Beauty 13,100 15,000 Paki stan Axabee Aleena Chandni Whitening Cream 8,790 Pakistan 18,000 Axabee Aleena Zuni Beyoutiful Beauty NA 27,000 Paki stan <u>Axabee</u> NA Cream Infocus Professional Pearl NA 18.000 Paki stan <u>Axabee</u> Aleena Beauty Cream Due Beauty Cream <u>Axabee</u> <u>Aleena</u> NA 14,000 Pakistan Paki stan Faiza Beauty Cream NA 7.700 **Axabee** Aleena NA 5.700 Face Fresh Beauty Cream Axabee Aleena Paki stan Seven Herbal Ubtan Cream NA NA 2,000 Paki stan NA 77 Kanza Beauty Cream Axabee NA Paki stan Stillman's Freckle Cream 14 Axabee Aleena NA Paki stan Stillman's Skin Bleach Axabee Aleena NA 4.1 Paki stan

## 2.2 Laboratory methodology used

All samples were sent for analysis by an accredited laboratory.

- SWCs purchased in Pakistan were analyzed by the TTi Testing Laboratories in Lahore, Pakistan. The laboratory used Atomic Absorption Spectroscopy (AAS) or Inductively Coupled Plasma Optical Emission Spectroscopy (ICP-OES) (see methodology in <u>Annex C</u>).
- Those purchased in the Philippines and Kenya 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 <u>Annex D</u>).
- SWCs purchased in the United States (U.S.) were analyzed by the Legend Technical Services Laboratory in St. Paul, Minnesota, using ICP-OES (see methodology in <u>Annex E</u>).

### 2.3 Results

As shown in Table 1, testing results revealed that the vast majority of the creams analyzed contained dangerous 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 level was 24000 ppm in the "Goree Beauty Cream with Lycopene" purchased in the United States. More details concerning these products and the test results are available in Annex F.

Table 1. The six SWCs targeted in this study with mercury content in parts per million (ppm)

Brand name	Product name	Country of purchase	Place of purchase	Mercury content (ppm)
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Kenya, Philippines	kilimall.co.ke/, lazada.com.ph/	6164,5 - 14167
Face Fresh	Beauty Cream	Pakistan, U.S.	daraz.pk, local market, manufacturer's website, Facebook, aleenacosmetics.com, axabeautyshop.com	9963 - 2200
Faiza	Beauty Cream	Kenya, Pakistan, Philippines, U.S.	jumia.co.ke/, kilimall.co.ke/, facebook, local market, daraz.pk, lazada.com.ph, aleenacosmetics.com, axabeautyshop.com, manufacturer's website	2361 - 15000
Golden Pearl	Beauty Cream	Kenya, Pakistan, U.S., Philippines	jiji.co.ke/, daraz.pk, local market, manufacturer's website, shopee.ph, Facebook, aleenacosmetics.com, axabeautyshop.com	1923,94 - 17000
Goree	Beauty Cream with Lycopene	Kenya, Pakistan, Philippines, U.S.	daraz.pk, facebook, local market, shopee.ph, aleenacosmetics.com, axabeautyshop.com,	2593,42 - 24000

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Brand name	Product name	Country of purchase	Place of purchase	Mercury content (ppm)
Parley	Goldie Advanced Beauty Cream- Pearl &Shine	Kenya, Pakistan, Philippines	jumia.co.ke, jiji.co.ke, manufacturer's website, daraz.pk, facebook, shopee.ph	0,03 - 13999

The table below presents the mercury concentrations of all SWCs sampled, indicating the dangerously high prevalence of this neurotoxin in most SWCs tested.

Less than 1 1 to 10 ppm 3% 100 to 1.000pm 8% 30% 1.000 to 1.000pm 54%

Figure 3: Distribution of 37 SWC samples based on mercury concentration

# 2.4 Analysis of the results

This investigation provides an indication of the global availability of Hg/SWCs, many of which appear, based on packaging labels, to have originated from Pakistan. These products were purchased locally from retail shops supplied by Pakistani manufacturers and from large online platforms offering Hg/SWCs globally and locally. Data on pricing can be found in Annex G.

## Availability and mercury content of target SWCs

The targeted creams were found to be generally available online. In particular, the "Faiza" and "Golden Pearl Beauty Cream" SWCs were offered for sale in all four countries included in this study. A noteworthy case is the "Beauty Cream with Avocado & Aloe Vera by Aneeza Gold," which appears to be manufactured by the same company that manufactures "Faiza Beauty Cream." This company apparently has manufacturing facilities in both Pakistan and the United Arab Emirates." "Aneeza Gold" is distributed from the UAE and was not found to be available in Pakistan—neither in physical shops nor through online marketplaces, social media, or the manufacturer's own website.

As seen in Table 2, the mercury concentration varied by brand, country of purchase, and even between similar SWCs, but dangerously high concentrations of mercury were found in almost all samples. Some notable concentration differences are highlighted in Annex H.

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Table 2: Distribution of mercury concentration per brand and country in parts per million

Brand name	Kenya	Pakistan	Philippines	U.S.	Average
Aneeza Gold	14167,00	N/A	6164,50	N/A	10165,75
Face Fresh	N/A	456,58	N/A	2050,00	987,72
Faiza	9609,00	2567,30	14320,00	15000,00	8200,80
Golden Pearl	10409,00	2095,16	9670,00	17000,00	7807,45
Goree	N/A	3185,90	19301,00	19500,00	11309,79
Parley	0,14	2865,93	13999,00	N/A	3766,18
Average	7299,05	2146,20	12690,90	13387,50	6837,31

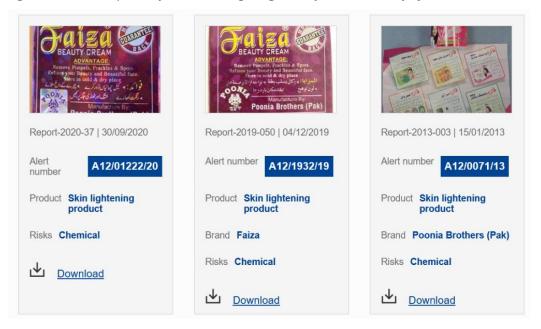
# 3. Ongoing manufacturing undermines global efforts

Challenges to government efforts to curtail Hg/SWC manufacture and distribution include the lack of clarity of existing legislation, weak enforcement, regulatory loopholes and insufficient international cooperation. As a result, the manufacture of Hg/SWCs continues. In many countries, meanwhile, and especially in more prosperous countries, laws and regulations are in place that grant the authorities the power to ban both production and distribution of Hg/SWCs.

A case in point is the European Union, through the <u>EU Rapid Alert System</u> for dangerous non-food products (Safety Gate – ex RAPEX), designed and proven to be effective in allowing information on measures taken against dangerous, unsafe or illegal products to be circulated quickly among national authorities. Every day, national authorities send alerts to the Safety Gate. Each alert contains information on the kind of product detected as dangerous, a description of the risk and the measures taken by the economic operator or ordered by the authority. All countries have to follow up this information and if they find the same product on their own markets and have taken further measures, they have to share this information on Safety Gate as well.

As of 25 September 2025, EU national authorities (plus Norway, Lichtenstein and Iceland) have reportedly banned 110 Hg/SWCs, 57 of which had been manufactured in Pakistan.xviii In one example, Norway issued an alert (A12/1932/19) in 2019 after the Faiza Beauty Cream, manufactured by Poonia Brothers, was found to contain 28500 ppm of mercury.xix

Figure 4: Screen capture of Pakistan-origin Hg/SWCs from the EU Safety Gate website



## Spotlight on Pakistan's production and distribution of Hg/SWCs

In January 2013, the United Kingdom submitted two alerts (A12/0059/13 and A12/0071/13) to the EU Safety Gate, reporting two different units of "Faiza No. 1 Beauty Cream" by "Poonia Brothers (Pak)," originating from Pakistan: one with "purple cardboard packaging containing whitening cream in a purple plastic pot" was tested to contain 5940 mg/kg of mercury, and one with "pink cardboard packaging containing whitening cream in a pink plastic pot with a purple lid" was tested to contain 5430 mg/kg of mercury.

In 2016, London Trading Standards took enforcement action against shops selling Pakistani manufactured Hg/SWCs, including Faiza Beauty Cream, Golden Pearl Cream and Face Fresh Cream. A total of 15 businesses were fined £168,579.\*\* These products are listed on the London Trading Standards detention list of skin lighteners.\*\*

Figure 5: Screen capture of one of the two alerts published in 2013 concerning Faiza Beauty Cream

Safety Gate Alerts

Alert number

A12/0071/13

Notifying country
Product category
Cosmetics
Type
Consumer
Product
Skin lightening product
Name
Faiza No.1 Beauty Cream
Poonia Brothers (Pak)
Unknown
Product description
Product description
Pink cardboard packaging containing whitening cream in a pink plastic pot with a purple lid.

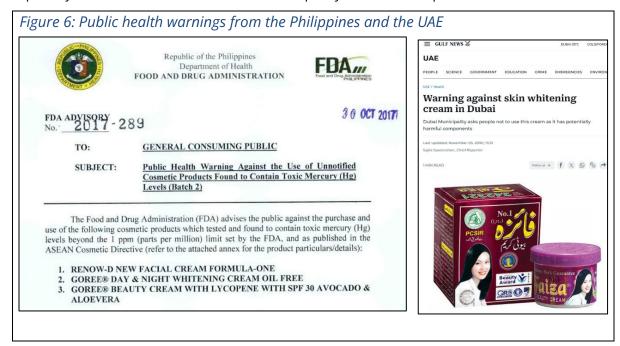
Risk type
Legal provisions (at EU level) and European standards against which the product was tested and did not comply
Country of origin
Pakistan

In 2017, the Philippines Food and Drug

Administration (FDA) issued warnings to avoid Pakistani manufactured Goree Day & Night and Goree Beauty Cream.xxii However, even with this ban, Philippine authorities have acknowledged

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that illegal imports continued, leading to renewed FDA Public Health Warnings in 2023<sup>xxiii</sup> and 2024.<sup>xxiv</sup> This highlights the importance of cross-country cooperation and production bans, especially in countries where there is limited capacity to monitor shipments.



In April of 2018, the New York City Department of Health and Mental Hygiene (NYC DoH) warned consumers about "Faiza Creams" and other products from Pakistan containing mercury.\*\*\*

In January 2018, the municipality of Dubai warned the public about mercury levels in Faiza Beauty Cream. The municipality also revealed that this beauty product had not been registered in their database of manufacturers.xxxi

A 2018 joint report of the Pakistan Ministry of Climate Change and the SDPI found that 56 of the 59 creams sampled by authorities exceeded the legal threshold.xxvii Faiza Beauty Cream was determined to be a major health hazard by the Pakistani Standards and Quality Control Authority as it contained "mercury, hydroquinone, and steroids," and the authority called for it to be banned.xxviii

In 2022, the Bangladesh Standards Agency banned 17 Hg/SWCs, many of which were manufactured in Pakistan.xxix



The New York City Department of Health and Mental Hygiene conducted another round of testing early in 2025, and on 7 October 2025, the New York Attorney General's office formally ordered three companies – Singhcart, Axabee and Aleena Cosmetics\*\*x\* – to "promptly cease and desist from any further offering for sale or sale in New York State of any cosmetic product containing unlawful levels of mercury, including but not limited to the products" in Figure 8 below, which includes six of the products previously tested also by ZMWG. According to the product packaging, all of these products appeared to have been manufactured in Pakistan. The New York Attorney General's office noted that the mercury content of these products was "in some cases 30,000 times higher than allowable levels,"\*xxxii and clarified that penalties would apply in the event of non-compliance. The letter to one of these companies is included in Annex K as representative of the three letters.

One day later, on 8 October 2025, Aleena Cosmetics issued an Urgent Product Safety Notice "voluntarily discontinuing and initiating a recall of several cosmetics," as included in Annex L.



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### 4. Conclusions/recommendations

Recent research indicates that the following governments have issued warnings about the six SWCs with dangerously high levels of mercury highlighted in this study:

- Goree Beauty Cream: Sri Lanka, NYC (USA), Brunei Darussalam, California (USA), Bangladesh, Singapore, Philippines, Canada, Fiji, New Zealand, USA, EU
- Golden Pearl Beauty Cream: USA, California (USA), EU, UK, New Zealand, Philippines
- Face Fresh Beauty Cream: USA, London (UKA), EU
- Faiza Beauty Cream: NYC (USA), EU, Bangladesh, London (UK), UAE, Philippines, Pakistan
- Parley Goldie Advanced Beauty Cream: NYC (USA), Philippines, EU
- Aneeza Beauty Cream: EU, USA, Philippines

The ongoing manufacture of Hg/SWCs appears to continue in Pakistan, although it also appears to be under increasing pressure. With few effective checks and balances in place to protect consumers from "fairness" companies that are "poisoning people for profit," one company reportedly has an advertising budget of one million USD per year, "making it a challenge to dissuade consumers.

The main focus of government authorities should be to ban the manufacture and hence the supply of Hg/SWCs at the source, as it is more effective than trying to stop their distribution, trade and retail sales via local and online markets.

The table in Annex J identifies a number of companies that may be manufacturing mercury-added SWCs. This table is drawn from an MPP submission to the Minamata Secretariat, xxxiv and is based on earlier work of the Zero Mercury Working Group, proactive governments and others. As incountry confirmation is required in all cases in order to confirm that a company is manufacturing mercury-added SWCs, these indications should serve only as a starting point for potential verification by host countries and relevant organizations.

In light of the initiatives and challenges faced in Pakistan, which must be similar to other countries dealing with SWC manufacturing, 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> to phase out Hg/SWC production, including a timeline, "checklists," a stakeholder engagement strategy, and interagency coordination.
- <u>Strengthen enforcement against non-compliance</u>, especially cross-boundary transport of prohibited mercury-added cosmetics.
- Enhance market surveillance and monitoring capacity, including purchasing of handheld testing devices.
- Regulate mercury supply: Control the production and trade of mercury and mercury compounds used in SWC production.

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## 5. References

<sup>1</sup> Competition Commission of Pakistan (CCP), *CCP Announces Crackdown on Toxic Whitening Creams*, Press release, October 2025. Available at: https://x.com/CCP Pakistan/status/1978430500982198598

- "Michael Bender, Engaging E-Commerce (and Others) in Eliminating Toxic Trade in Mercury Added Cosmetics, Presentation during International Conference on Mercury as a Global Pollutant, July 2024. Available at: <a href="https://www.mercurycapetown.com/wp-content/uploads/2024/10/6-Michael-Bender-ICMGP\_ZMWG\_July\_2024\_Final\_draft-rev-17-July.pdf">https://www.mercurycapetown.com/wp-content/uploads/2024/10/6-Michael-Bender-ICMGP\_ZMWG\_July\_2024\_Final\_draft-rev-17-July.pdf</a>
- "ZMWG Database of Skin-Lightening Creams. Available at: <a href="https://www.zeromercury.org/cream-catalog/">https://www.zeromercury.org/cream-catalog/</a>
- iv *Pakistan Journal of Dermatology*, 2021. Available at: https://jpad.com.pk/index.php/jpad/article/view/1321/1517
- <sup>v</sup> Health Impacts of Mercury-Containing Skin Whitening Products and the Minamata Convention, SDPI Roundtable, 19 September 2023.
- viMinamata Convention Initial Assessments: Pakistan. Available at: https://minamataconvention.org/en/documents/minamata-convention-initial-assessments-pakistan
- viiDovepress, Personal Care & Cosmetic Practices in Pakistan: Current Perspectives and Future Trends, Clinical, Cosmetic and Investigational Dermatology (CCID). Available at: https://www.dovepress.com/personal-care-cosmetic-practices-in-pakistan-current-perspectives-and--peer-reviewed-fulltext-article-CCID
- viiiMichael Bender, Engaging E-Commerce (and Others) in Eliminating Toxic Trade in Mercury Added Cosmetics. Presentation during International Conference on Mercury as a Global Pollutant, July 2024. Available at: <a href="https://www.mercurycapetown.com/wp-content/uploads/2024/10/6-Michael-Bender-ICMGP\_ZMWG\_July\_2024\_Final\_draft-rev-17-July.pdf">https://www.mercurycapetown.com/wp-content/uploads/2024/10/6-Michael-Bender-ICMGP\_ZMWG\_July\_2024\_Final\_draft-rev-17-July.pdf</a>
- <sup>ix</sup> Environment Investigation Agency, *Mercury in Retrograde: The Dark World of Toxic Skin Lightening Products*, October 2023. Available at: <a href="https://eia.org/report/mercury-in-retrograde/">https://eia.org/report/mercury-in-retrograde/</a>
- \* Environment Investigation Agency, *Mercury in Retrograde: The Dark World of Toxic Skin Lightening Products*, October 2023. Available at: <a href="https://eia.org/report/mercury-in-retrograde/">https://eia.org/report/mercury-in-retrograde/</a>
- <sup>xi</sup> Health Impacts of Mercury Containing Skin Whitening Products and the Minamata Convention, SDPI roundtable, 19 September 2023.
- xii Pakistan Standards and Quality Control Authority (PSQCA), *PS 3228:2017 Skin Whitening Creams Specification*. Available at: <a href="https://psqca.com.pk/cs/Chemical/PS%203228-2017.pdf">https://psqca.com.pk/cs/Chemical/PS%203228-2017.pdf</a>
- xiii PSQCA, *Certification Marking of Products*. Available at: <a href="https://www.psqca.com.pk/confirmity-assessment-ca/certification-marking-of-products/">https://www.psqca.com.pk/confirmity-assessment-ca/certification-marking-of-products/</a>
- xiv The Express Tribune, *What Is Really Inside Your Skin Whitening Cream?*, October 2025. Available at: https://tribune.com.pk/story/2572379/what-is-really-inside-your-skin-whitening-cream
- \*\* Competition Commission of Pakistan (CCP), *CCP Announces Crackdown on Toxic Whitening Creams*, Press release, October 2025. Available at:
- https://x.com/CCP\_Pakistan/status/1978430500982198598
- xvi ZMWG reports <a href="https://www.zeromercury.org/mercury-added-skin-lightening-creams-campaign/">https://www.zeromercury.org/mercury-added-skin-lightening-creams-campaign/</a>

#### October 2025

- Environment Investigation Agency, *Mercury in Retrograde: The Dark World of Toxic Skin Lightening Products*. The report notes that a representative of Faiza stated they manufacture creams under other brands, including Aneeza (p. 11), and that Faiza maintains a manufacturing entity in the UAE. Packaging of Aneeza creams purchased by <u>ZMWG</u> over the years indicates they are made in Pakistan. Available at: <a href="https://eia.org/report/mercury-in-retrograde/">https://eia.org/report/mercury-in-retrograde/</a>
- <sup>xviii</sup> European Commission, EU Safety Gate. Filtered search conducted on 25 September 2025 using filters "Cosmetics," "Chemical," and "Mercury." Of 112 results, 110 were skin-lightening products, with 57 reported as originating from Pakistan. Available at: <a href="https://ec.europa.eu/safety-gate">https://ec.europa.eu/safety-gate</a>
- xix In January 2013, the European Commission, through RAPEX notified its member states and subscribers, including Amazon, that "Faiza No. 1 Beauty Cream" by "Poonia Brothers (Pak)" had been tested by the United Kingdom and contained 5,430 mg/kg of mercury. The RAPEX notification described the Faiza cream as "pink cardboard packaging containing whitening cream in a pink plastic pot with a purple lid." A photograph accompanied the notification that matched this description, and RAPEX listed the country of origin for Faiza as Pakistan. Also in January 2013, RAPEX notified its members that a separate unit of "Faiza Beauty Cream" by "Poonia Brothers (Pak)" had been tested by a member state and contained 5,940 mg/kg of mercury." A photograph accompanied the notification that matched this description, and RAPEX listed the country of origin as Pakistan.
- \*\* London Trading Standards, London Cosmetic Shops Fined £168,000 for Selling Illegal Cosmetics, Available at: https://www.londontradingstandards.org.uk/projects/london-cosmetic-shops-fined-168000-selling-illegal-cosmetics/#
- xxi London Trading Standards, List of skin lighteners and related products tested and found to contain prohibited ingredients by London Trading Standards in 2014-23. Available at: https://www.londontradingstandards.org.uk/wp-content/uploads/2024/08/LTS-Cosmetic-Product-failed-samples-2024-v1.1.pdf https://www.londontradingstandards.org.uk/wp-content/uploads/2024/08/LTS-Cosmetic-Product-failed-samples-2024-v1.1.pdf
- \*\*\*ii Food and Drug Administration (Philippines), *FDA Advisory No. 2017-289*. Available at: https://www.fda.gov.ph/wp-content/uploads/2022/05/FDA-Advisory-No.-2017-289.pdf
- xxiiiFood and Drug Administration (Philippines), FDA Advisory No. 2023-2344: Public Health Warning Against the Purchase and Use of Unauthorized Cosmetic Goree Beauty Cream with Lycopene, Avocado and Aloe Vera. Available at: https://www.fda.gov.ph/fda-advisory-no-2023-2344-public-health-warning-against-the-purchase-and-use-of-unauthorized-cosmetic-goree-beauty-cream-with-lycopene-avocado-and-aloe-vera/
- xxiv Food and Drug Administration (Philippines), FDA Advisory No. 2024-1033: Public Health Warning Against the Purchase and Use of Unnotified Cosmetic Goree Avocado Aloevera Whitening Body Lotion with Lycopene. Available at: https://www.fda.gov.ph/fda-advisory-no-2024-1033-public-health-warning-against-the-purchase-and-use-of-unnotified-cosmetic-goree-avocado-aloevera-whitening-body-lotion-with-lycopene/
- xxv New York City Department of Health, *Mercury in Soaps and Creams*. Available at: https://www.nyc.gov/site/doh/health/health-topics/mercury-in-soaps-and-creams.page
- xxvi Daytimes Pakistan, *Here is What Dubai Municipality Says About Faiza Beauty Cream*, January 2018. Available at: <a href="https://daytimes.pk/news/dubai-municipality-says-faiza-beauty-cream/">https://daytimes.pk/news/dubai-municipality-says-faiza-beauty-cream/</a>
- <sup>xxvii</sup> Khan, N., Ullah, F., Khan, T., Zafar, U., Khan, M., Mustaqeem, M., Shah, S., Wu, D. & Ji, X. (2021). Personal care cosmetic practices in Pakistan: Current perspectives and management. Clinical, Cosmetic and Investigational Dermatology, v. 14. doi: 10.2147/CCID.S270667

#### October 2025

xxviii INCPak, *Faiza Beauty Cream Banned in Pakistan*, December 2018. Available at: https://www.incpak.com/health/faiza-beauty-cream-banned-in-pakistan/

xxix The Business Standard (Bangladesh), *Bangladesh Bans 17 Pakistani Face Creams for Dangerous Levels of Mercury*, July 2022. Available at: <a href="https://www.tbsnews.net/bangladesh/bangladesh-bans-17-pakistani-face-creams-dangerous-levels-mercury-457510">https://www.tbsnews.net/bangladesh/bangladesh-bans-17-pakistani-face-creams-dangerous-levels-mercury-457510</a>

xxx New York Attorney General, *Cease and Desist Letters to Singhcart, Axabee, and Aleena Cosmetics,* July 2025. Available at:

https://stateimpactcenter.org/files/AG\_Actions\_New\_York\_CeaseDesist\_Singhcart\_10.07.2025.pdf;

https://stateimpactcenter.org/files/AG\_Actions\_New\_York\_Cease\_Desist\_Axabee\_10.07.2025.pdf;

https://stateimpactcenter.org/files/AG\_Actions\_New\_York\_Cease\_Desist\_AleenaCosmetics\_10.07. 2025.pdf

xxxi New York Attorney General Press Release, Attorney General James Takes Action to Protect New Yorkers from Illegal Mercury Skin Lightening Products, October 2025. Available at: https://ag.ny.gov/press-release/2025/attorney-general-james-takes-action-protect-new-yorkers-illegal-mercury-skin

xxxii Aleena Cosmetics website. Available at: https://aleenacosmetics.com/

xxxiii Daily Pakistan, *Popular beauty cream banned in Pakistan over toxic chemical use*, January 2018. Available at: <a href="https://en.dailypakistan.com.pk/pakistan/popular-beauty-cream-banned-in-pakistan-over-toxic-chemical-use/">https://en.dailypakistan.com.pk/pakistan/popular-beauty-cream-banned-in-pakistan-over-toxic-chemical-use/</a>

xxiv Mercury Policy Project, Overcoming Challenges of Banning Manufacture/Trade of Mercury Added Skin Lightening Products, Mercury Policy Project input to the invitation to submit information regarding mercury-added cosmetics pursuant to COP decision MC-5/5, June 2023. Available at: https://owncloud.unog.ch/s/NOq861kP4jB8c6J#pdfviewer

## **Annexes**

## Annex A – ZMWG list of suspect SWCs tested in this study

Please find below the list of creams to investigate for the 2024 sampling. Please pay attention to both the brand (in bold) and product name, as well as its associated picture.

Tips on how to search for the creams listed below on online platforms:

- In the search engine of the online platform, insert the name of the cream (brand name + product name) as a basis. If no result is found, try to play a bit with the name by shortening it or by adding a word such as "whitening cream", "lightening", etc.
  - E.g., Instead of 'JiaoLi HuiChunSu Face Cream 7 Day Specific Eliminating Freckle', just type 'Jiaoli' or 'Jiaoli whitening cream' etc and compare with the picture.
- You can also try to translate the words 'cream' or 'whitening cream' in your language/website language

Please make sure to have a look at the picture provided in this appendix, to ensure that the cream you have found is the same as the one we are looking for.

202	2024 Priority List					
#	Brand and product name	Picture				
1	Aneeza Gold Beauty Cream with Avocado & Aloe Vera	BEAUTY CREAM Removes Acre, Primples, Spots & Dark Circles with Avocado & Alov Vera				
2	Face Fresh Beauty Cream	FR FACE FRESH				
3	Faiza Beauty Cream	PCSIR  DESCRIPTION  PCSIR  DESCRIPTION  PCSIR  DESCRIPTION  PCSIR  DESCRIPTION  PCSIR  PCSIR				

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202	2024 Priority List					
#	Brand and product name	Picture				
4	Golden Pearl Beauty Cream	Golden				
5	Goree Beauty Cream with Lycopene	Section of the sectio				
6	Parley Goldie Advanced Beauty Cream	Partey Goldie Beauty Geam PARE HINE				

## Annex B - Instructions for sampling of SWCs

# Instructions for the 2024 sampling of skin-lightening products in <u>Kenya (including protocol + screenshot of the survey spreadsheet)</u>

The ultimate goal of the ZMWG skin-lightening campaign is to phase out the manufacture and trade of illegal high mercury skin-lightening products (SLPs). Therefore, this new sampling round, with a focus on manufacturers in Pakistan, will aim to assess the state of play of online and in store sales of harmful skin-lightening products, and evaluate whether online platforms and local stores have been continuing transactions of high mercury products. It will also aim to keep Internet sales within and outside Pakistan in the spotlight and highlight to authorities possible flaws when it comes to liabilities for Internet platforms.

#### Funding conditions for purchasing creams:

Any ZMWG member that is already contracted within the framework of the skin-lightening cream project will use their respective budget that has been allocated to the purchase of creams from internet, as per conditions below. You will need to contact the EEB BEFORE (see below for more information)

#### STEP 1: Screening and purchasing

On the basis of the previous reports and analyses, the EEB is proposing to purchase six suspect high mercury cream from online platforms. List of creams to be purchased can be found in Appendix 2.

1) Identify which online platform(s) are well used in Kenya



We are referring to online platforms such as "ebay", "amazon", "Daraz" etc, so not "online shop".

2) On the selected online platform(s), look for the six creams listed in Appendix 2, i.e. "Faiza Beauty Cream", "Golden Pearl Beauty Cream", "Goree Beauty Cream with Lycopene", "Face Fresh Beauty Cream", "Aneeza Gold Beauty Cream", "Parley Goldie Advanced Beauty Cream"

IMPORTANT!!! The way platforms are searched matters. Please read below carefully!

How to search for the creams on online platforms?

- In the search engine of the online platform, insert the exact name of the cream as a basis. If no result is found, try to play with the brand name by shortening it or by adding a word such as "whitening cream", "lightening", etc.
  - Eg. Instead of 'JiaoLi HuiChunSu Face Cream 7 Day Specific Eliminating Freckle', just type 'Jiaoli' or 'Jiaoli whitening cream' etc
- You can also try to translate the words 'cream' or 'whitening cream' in your language/website language
- You need to however ensure that the cream found is the exact cream searched for (as it is likely other types of creams to appear if only the brand name is looked for)
- Please make sure to ALSO have a look at the picture provided in the Appendix 2, to ensure that the cream you have found is the same as the one we are looking for.
- NB: In some cases, a cream can be online, however the name of the brand does not appear in the title, nor in the description, which means that it will be really

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hard to find it (if a search is made via the brand name). So, it is also important to have a look at the picture of the creams and familiarize with them (see Appendix 2), so that you can spot creams for which no reference to the brand is provided. In relation to that, you could try typing 'whitening cream' in the search bar, and verify from the first results if any creams from appendix 2 is appearing.

3) Once a cream has been spotted, take a screenshot of the page and save it under the following folder with your country name: 2024 SLPs sampling round. Please name the screenshots according to the format "country abbreviation"-"name of product", "place of purchase" "day"-"month"-"year".jpg.

When taking the screenshot, make sure to capture the online platform name, the cream itself and the date on your computer. This way, we have definite proof that the company which sold the cream was available.

- 4) As per the Appendix 3, fill in the blue sections i.e. Brand name; product name; date of logging; the cost in local currency of the product; for how many creams it is (if more than one); the exchange rate to Euro at the date of noting the cost, using the XE Currency converter (<a href="www.xe.com">www.xe.com</a>); and copy paste the link to the product under the last column, so that you can easily find it again after confirmation from the EEB which products to purchase.
- 5) Send the appendix 3 to the EEB at the following address: <u>raphaelle.catte@eeb.org</u>. The EEB will review it and provide the green light for purchase.
- 6) After EEB confirmation, please proceed with the purchase of the creams agreed with the EEB. When about to purchase, repeat steps 3 and 4 above, i.e.
  - i. Take a new screenshot and save it in the second folder of your country folder under 2024 SLPs sampling round
  - ii. Update the information from the blue sections in the Appendix 3 when needed (costs, date of purchase, etc)

STEP 2: After you receive the purchased creams

Handling and storing of the purchased products

- 7) Make sure to wear gloves when handling the creams (especially women), and try to be in a ventilated room.
- 8) Do not store the purchased products in hot conditions, as this may enhance breakdown of some mercury compounds, with subsequent loss of the mercury. Try to find the coolest secure place outside the house or office, and do not store the product near food, e.g. in the fridge.
- 9) Do not open the tube/box/jar (and do not remove the plastic wrapped around it, if there is any). They need to be delivered intact to the regional testing hubs.
- 10) If some of the creams were damaged during transportation, were opened or spilled, be extra careful. Please note it down in the comment section of appendix 3, and inform the EEB.

Logging in/inventorying all other relevant information in the yellow columns of the Appendix 3.

11) Log all the remaining information in the Appendix 3 (yellow sections) <u>BEFORE</u> sending the samples to the testing hub. This step is important! It includes: the reference number (Please also make sure to add the corresponding reference number on the cream jar/box);

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expiration date, batch number; country and address of the intermediary who actually sent the product, the country of origin as per packaging, the manufacturer/distributor name; and indication of mercury in the ingredients lists.

Please be aware that some brands may have several jars or tubes in their box (e.g. night + day cream jars). If this is the case, you will need to inventory them <u>separately</u> with a distinct reference number as they constitute different creams of one same package.

- 12) Take several pictures of the samples purchased, including their ingredients list and the manufacturer/distributer name + country of origin. Please save the pictures under the 3rd folder of your country folder under 2024 SLPs sampling round. Name the picture according to the format, "Reference number", "day"-"month"-"year".jpg
- 13) Send electronically the fully filled-in appendix 3 to: <a href="mailto:raphaelle.catte@eeb.org">raphaelle.catte@eeb.org</a>
- 14) Once steps 11-14 are fulfilled, in collaboration with the EEB, please send the samples to the Greek QACS lab following the shipping instructions that will be sent to you (see also step 3 below). The EEB DHL Account will be used and shipping costs will be directly covered by the EEB.

#### STEP 3: Shipping instructions

- 15) To gain weight and space, please start by removing the boxes to only keep the jars or tubes, with the reference numbers stuck on them. Please pack each jar in an individual small zipper plastic bag (or plastic bubble bag) to ensure protection of the jar and avoid contamination of the creams in case one was to open during transportation.
- 16) Please pack the creams in the smallest possible box, as the cost is relevant to the size and weight of the box. Make sure that the box is packed properly to avoid that the creams get damaged so please do not use envelop or bags, but only box with the samples secured inside. In the box, please also include the appendix 3 (to be sent via email too as per step 14).
- 17) We will use the EEB DHL account to ship the samples. Further instructions will be provided in due course.

If you have general questions, please contact:

Raphaëlle Catté, EEB/ZMWG Email: <u>raphaelle.catte@eeb.org</u> Elena Lymberidi-Settimo, EEB/ZMWG

Email: elena.lymberidi@eeb.org, Telephone: +32 496 532818

### Instructions for the 2024 sampling of skin-lightening products in Pakistan

The ultimate goal of the ZMWG skin-lightening campaign is to phase out the manufacture and trade of illegal high mercury skin-lightening products (SLPs). Therefore, this new sampling round, with a focus on manufacturers in Pakistan, will aim to assess the state of play of online and in store sales of harmful skin-lightening products, and evaluate whether online platforms and local stores have been continuing transactions of high mercury products. It will also aim to keep Internet sales in the spotlight and highlight to authorities possible flaws when it comes to liabilities for Internet platforms.

#### Funding conditions for purchasing creams:

Any ZMWG member that is already contracted within the framework of the skinlightening cream project will use their respective budget that has been allocated to the purchase of creams from internet, as per conditions below. You will need to contact the EEB BEFORE (see below for more information)

### STEP 1: Screening and purchasing

On the basis of the previous reports and analyses, the EEB is proposing to purchase suspect high mercury cream from four sources: directly from official brand websites; from local markets/shops; from online platforms and from facebook. List of creams to be purchased can be found in Appendix 2.

### Purchase directly from official brand websites (5 in total)

- 18) Please purchase five creams from the following sites:
  - One "Faiza Beauty Cream" from <a href="https://faizabeautycream.com/product/faizabeauty-cream-medium/">https://faizabeautycream.com/product/faizabeauty-cream-medium/</a>
  - One "Golden Pearl Beauty Cream" from https://goldenpearl.com.pk/product/golden-pearl-beauty-cream/
  - One "Goree Beauty Cream with Lycopene" from <a href="https://goreecosmetics.com/shop/">https://goreecosmetics.com/shop/</a>
  - One "Face Fresh Beauty Cream" from <a href="https://facefresh.com/product-category/cream/">https://facefresh.com/product-category/cream/</a>
  - One "Parley Goldie Advanced Beauty Cream" from https://parleycosmetics.com/product-category/skincare/page/3/ (to note, the product is sometimes just called "Goldie Beauty Cream", but the packaging and product do have the mention "advanced")
- 19) Once a cream has been spotted, take a screenshot of the page and save it under the following folder with your country name: 2024 SLPs sampling round. Please name the screenshots according to the format "country abbreviation"-"name of product", "place of purchase". "day"-"month"-"year".jpg.

When taking the screenshot, make sure to capture the online platform name, the cream itself and the date on your computer. This way, we have definite proof that the company which sold the cream was available.

- 20) As per the Appendix 3, fill in the blue section. See tab "official brand website" in Appendix 3.
- 21) Order the creams, and once received, please fill in yellow sections of the inventory, take picture of the creams and save under the folder 2024 SLPs sampling round.

Purchase of similar creams from local markets/shops (6 in total)

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- 22) Please purchase each of the six creams listed in Appendix 2 in Pakistani markets/shops.
- 23) Once purchased, please fill in the inventory. See tab "local stores or markets" in Appendix 3.

## Purchase online from well-used online platforms in Pakistan (6 in total)

24) Identity which online platform(s) are well used in Pakistan



We are referring to online platforms such as "ebay", "amazon", "Daraz" etc, so not "online shop")

25) On the selected online platform(s), look for the six creams listed in Appendix 2, i.e. "Faiza Beauty Cream", "Golden Pearl Beauty Cream", "Goree Beauty Cream with Lycopene", "Face Fresh Beauty Cream", "Aneeza Gold Beauty Cream", "Parley Goldie Advanced Beauty Cream"

IMPORTANT!!! The way platforms are searched matters. Please read below carefully!

How to search for the creams on online platforms?

- In the search engine of the online platform, insert the exact name of the cream as a basis. If no result is found, try to play with the brand name by shortening it or by adding a word such as "whitening cream", "lightening", etc.
  - Eg. Instead of 'JiaoLi HuiChunSu Face Cream 7 Day Specific Eliminating Freckle', just type 'Jiaoli' or 'Jiaoli whitening cream' etc
- You can also try to translate the words 'cream' or 'whitening cream' in your language/website language
- You need to however ensure that the cream found is the exact cream searched for (as it is likely other types of creams to appear if only the brand name is looked for)
- Please make sure to ALSO have a look at the picture provided in the Appendix 2, to ensure that the cream you have found is the same as the one we are looking for.
- NB: In some cases, a cream can be online, however the name of the brand does not appear in the title, nor in the description, which means that it will be really hard to find it (if a search is made via the brand name). So, it is also important to have a look at the picture of the creams and familiarize with them (see Appendix 2), so that you can spot creams for which no reference to the brand is provided. In relation to that, you could try typing 'whitening cream' in the search bar, and verify from the first results if any creams from appendix 2 is appearing.
- 26) Once a cream has been spotted, take a screenshot of the page and save it under the following folder with your country name: <u>2024 SLPs sampling round</u>. Please name the screenshots according to the format "country abbreviation"-"name of product", "place of purchase" "day"-"month"-"year".jpg.

When taking the screenshot, make sure to capture the online platform name, the cream itself and the date on your computer. This way, we have definite proof that the company which sold the cream was available.

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- 27) As per the Appendix 3, fill in the blue sections i.e. Brand name; product name; date of logging; the cost in local currency of the product; for how many creams it is (if more than one); the exchange rate to Euro at the date of noting the cost, using the XE Currency converter (www.xe.com); and copy paste the link to the product under the last column, so that you can easily find it again after confirmation from the EEB which products to purchase.
- 28) Send the appendix 3 to the EEB at the following address: <a href="mailto:raphaelle.catte@eeb.org">raphaelle.catte@eeb.org</a>. The EEB will review it and provide the green light for purchase.
- 29) After EEB confirmation, please proceed with the purchase of the creams agreed with the EEB. When about to purchase, repeat steps 9 and 10 above, i.e.
  - iii. Take a new screenshot and save it in the second folder of your country folder under 2024 SLPs sampling round
  - iv. Update the information from the <u>blue sections</u> in the <u>Appendix 3</u> when needed (costs, date of purchase, etc)

#### Purchase from facebook (6 in total)

- 30) On facebook, look for traders who sell the creams listed in Appendix 2, i.e. "Faiza Beauty Cream", "Golden Pearl Beauty Cream", "Goree Beauty Cream with Lycopene", "Face Fresh Beauty Cream", "Aneeza Gold Beauty Cream", "Parley Goldie Advanced Beauty Cream".
- 31) Similar to the purchase for online platforms, please repeat steps 9 to 12.

STEP 2: After you receive the purchased creams

Handling and storing of the purchased products

- 32) Make sure to wear gloves when handling the creams (especially women), and try to be in a ventilated room.
- *33)* <u>Do not</u> store the purchased products in hot conditions, as this may enhance breakdown of some mercury compounds, with subsequent loss of the mercury. Try to find the coolest secure place outside the house or office, and do not store the product near food, e.g. in the fridge.
- 34) <u>Do not</u> open the tube/box/jar (and do not remove the plastic wrapped around it, if there is any). They need to be delivered intact to the regional testing hubs.
- 35) If some of the creams were damaged during transportation, were opened or spilled, be extra careful. Please note it down in the comment section of appendix 3, and inform the EEB.

Logging in/inventorying all other relevant information in the yellow columns of the Appendix 3.

36) Log all the remaining information in the Appendix 3 (yellow sections) BEFORE sending the samples to the testing hub. This step is important! It includes: the reference number (Please also make sure to add the corresponding reference number on the cream jar/box); expiration date, batch number; country and address of the intermediary who actually sent the product, the country of origin as per packaging, the manufacturer/distributor name; and indication of mercury in the ingredients lists.

Please be aware that some brands may have several jars or tubes in their box (e.g. night + day cream jars). If this is the case, you will need to inventory them <u>separately</u> with a distinct reference number as they constitute different creams of one same package.

37) Take several pictures of the samples purchased, including their ingredients list and the manufacturer/distributer name + country of origin. Please save the pictures under the

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- 3rd folder of your country folder under 2024 SLPs sampling round. Name the picture according to the format, "Reference number", "day"-"month"-"year".jpg
- 38) Send electronically the fully filled-in appendix 3 to: raphaelle.catte@eeb.org
- 39) Once steps 11-14 are fulfilled, in collaboration with the EEB, please send the samples to the Greek QACS lab following the shipping instructions that will be sent to you (see also step 3 below). The EEB DHL Account will be used and shipping costs will be directly covered by the EEB.

#### STEP 3: Shipping instructions

- 40) To gain weight and space, please start by removing the boxes to only keep the jars or tubes, with the reference numbers stuck on them. Please pack each jar in an individual small zipper plastic bag (or plastic bubble bag) to ensure protection of the jar and avoid contamination of the creams in case one was to open during transportation.
- 41) Please pack the creams in the smallest possible box, as the cost is relevant to the size and weight of the box. Make sure that the box is packed properly to avoid that the creams get damaged so please do not use envelop or bags, but only box with the samples secured inside. In the box, please also include the appendix 3 (to be sent via email too as per step 14).
- *42)* We will use the EEB DHL account to ship the samples. Further instructions will be provided in due course.

If you have general questions, please contact:

Raphaëlle Catté, EEB/ZMWG Email: <u>raphaelle.catte@eeb.org</u> Elena Lymberidi-Settimo, EEB/ZMWG

Email: elena.lymberidi@eeb.org, Telephone: +32 496 532818

#### ZMWG Sampling protocol 2024 – Logging information

By means of an Excel spreadsheet, the following information was collected for each sample purchased

- Brand name
- Product name
- Screenshot saved with the day of checking/ purchase
- Date of logging
- Expiration date
- Batch Number
- Product identification number (eg: ASIN, EAN, UPC etc)
- Cost (local currency)
- Number of products (if batch)
- Date of logging cost
- Exchange rate (xe.com)
- Cost (Euro)
- Delivery Cost (Euro)
- Country and address details of the intermediary who actually sent the product
- Country of origin as per packaging
- Manufacturer/distributor
- Indication of mercury content from ingredients list (tick X if indicated)
- Photo of the product purchased

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- Photo of the ingredient list of the product purchased
- Internet Link of the cream on the platform
- Comments (if any)

Screenshot of the template and a sample of the information collected:

As reference number, you can add the initials of your country			Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E, etc)	Screenshot saved with the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform, the product and date	Expiration date  The date of expiration. It can appear on the jar of the cream OR on the box. Check also inside the box	Batch Number  The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
to be filled in when you  [Fill in Name]  Reference number  As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Official website of the brand  Specify the official website of the brand of the creams which has	Brand name  Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
to be filled in when you  [Fill in Name]  Reference number  As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Official website of the brand  Specify the official website of the brand of the creams which has	Brand name  Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
to be filled in when you  [Fill in Name]  Reference number  As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Official website of the brand  Specify the official website of the brand of the creams which has	Brand name  Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
[Fill in Name]  Reference number  As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Official website of the brand  Specify the official website of the brand of the creams which has	Brand name  Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Specify the official website of the brand of the creams which has	Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Specify the official website of the brand of the creams which has	Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Specify the official website of the brand of the creams which has	Please indicate the brand name of the	Please indicate the product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the day of checking/ purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	The date of expiration. It can appear on the jar of the cream OR on the box. Check also	The batch number is the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
As reference number, you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	Specify the official website of the brand of the creams which has	brand name of the	product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	purchase  Take a screenshot of the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	It can appear on the jar of the cream OR on the box. Check also	the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
you can add the initials of your country followed by a number 1, 2 3. Etc. (e.g. BE01 for Belgium) the same reference should be on the outside/inside	website of the brand of the creams which has	brand name of the	product name of the cream, which generally specify/complement the brand (eg: beauty cream with Vitamin E,	the product, and save in your country folder with the name of the online platform. Please make sure to capture name of the platform,	It can appear on the jar of the cream OR on the box. Check also	the designation, in numbers and/or letters, to identify and trace a set of identical products that share certain characteristics
			ett	on your computer. Name the screenshots according to the format, "name of product", "day"- "month"-"year".jpg.		of production. It can be found on the jar of the cream OR on the box. Check also inside the box. It can also appear aside the expiration date or manufacturing date
BEOO		Duo	Boouty Croom	Soo in folder #1 Screenb	Doc 24	
			<u> </u>			
E	3E09 3E05 Dfficial brand websi	3E05	BEOS Face Fresh	BE05 Face Fresh Beauty Cream	### ### ### ### ### ### ### ### ### ##	#month"-"year".jpg.  Due Beauty Cream See in folder #1 Screenh Dec-24  BE05 Face Fresh Beauty Cream See in folder #1 Screenh October 2023

## Annex C - Laboratory methodology used in Pakistan



SOP for Determination of Metal Content in Cosmetic Products

#### 1. Principle

Sample is subjected to wet digestion method in which the addition of concentrated acids decomposes the sample and converting the metal in the form of respective salt. The prepared sample is analysed by Atomic Absorption Spectroscopy (AAS) or Inductively Coupled Plasma-Optical Emission Spectroscopy (ICP-OES).

### 2. Preparation of Calibration Standards:

Prepare intermediate standard solution from the stock solution as given in Table 1.1 with 3% nitric acid to solution. Prepare working standards from the intermediate as given in Table 1.2.

Table 1.1 Preparation of Intermediate Mix standard

Element	Volume of 1000 mg/L standard stock solution (mL)	Final Volume (mL)	Final Concentration (mg/L)
Al, Sb, As, Ba, Cd, Cr, Cu, Pb, Hg, Ni, Se, Fe	10	100	100

Table 1.1 Preparation of Working Standards

Working Standards	Volume of intermediate mix standard (mL)	Final makeup volume (mL)	Final Concentration (mg/L)
1	0.05	100	0.05
2	0.1	100	0.1
3	0.5	100	0.5
4	1.0	100	1.0
5	2.0	100	2.0
6	10.0	100	10.0

#### **3.** Procedure:

#### 3.1 Hot Plate Digestion:

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- 3.1.1 Weigh approximately about 2.0 g of the homogenize sample into a 200 mL beaker & and then add 5-10 mL of distilled water.
- 3.1.2 Digest with 2.5 mL nitric acid by slow heating on a hot plate till evaporate to dryness.
- 3.1.3 Mix a small amount of distilled water and cool the sample to room temperature.
- 3.1.4 Rinse the beaker with deionized water and filter the sample using PTFE filters into 100mL volumetric flask.
- 3.1.5 Dilute it up to the mark by adding deionized water and shake thoroughly.
- 3.1.6 Prepare a reagent blank by following the above procedure.
- 3.1.7 Analyse the sample on FAAS or ICP-OES following Tti/Inorg/Lab/WI-01 or Tti/Inorg/Lab/WI-06 respectively.

### **4.** Quality Control

### **4.1.** Calibration Curve

- 4.1.1 Accept the calibration curve if correlation coefficient,  $r^2$  is  $\geq 0.995$ , otherwise redraw calibration curve with freshly prepared working standard solutions.
- 4.1.2 A new calibration curve with freshly prepared standard solutions will be drawn each time for new estimation if necessary.
- 4.1.3 Samples having concentration higher than the calibration curve as further diluted to attain concentration in the range of the curve.

### **4.2** Quality Checks:

- 4.2.1 For uniformity and stability of the value among samples and triplicates QC can be run before analysing the samples and deviation up to 10% is acceptable.
- 4.2.2 For preparation of QC, use independent stock standard of 1000 ppm or multi element readily prepared standard which should not be used in preparation of standard curve.
- 4.2.3 Always perform method blank to nullify the effect of reagent in sample solution.

#### 5. Calculation

Metal content (mg/kg) =  $(C/W) \times V \times F$ 

Metal content (%) =  $(C/W) \times V \times F \times (1/10000)$ 

Where:

C = machine value of respective metal (ppm) V = volume of sample solution (mL)

F = dilution factor if necessary W = sample weight (g)

#### **6.** References

- **6.1** Test Method: ISO/TR 17276:2014 Cosmetics- Analytical approach for screening and quantification methods for heavy metals in cosmetics.
- **6.2** Cosmetic Products Safety Requirements of Cosmetics and Personal Care Products (GSO-1943:2021)
- **6.3** PS 3228/2017-Appendix G.

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## Annex D - Laboratory methodology QACS

The determination of mercury was assessed with atomic absorption spectrometry.

The apparatus was a Perkin Elmer AAnalyst<sup>™</sup> 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 % NaBH4 in 0.05% NaOH
  - IV. Sample loop 500 μl
  - V. Read time 20s

### For the 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 $_4$  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 KMnO4, 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 %  $KMnO_4$  added and the blank is diluted to volume with water

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## Annex E - 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 HNO3 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 HNO3 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  $95^{\circ}$ C +/-  $5^{\circ}$ 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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# Annex F—High-mercury SWCs identified in this study

BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	PLACE OF PURCHASE	MERCURY CONTENT (IN PPM)
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Kenya	kilimall.co.ke/	14167
Faiza	Beauty Cream	Kenya	jumia.co.ke/	9232
Faiza	Beauty cream	Kenya	https://www.kilimall.co.ke/	9986
Golden Pearl	Beauty Cream	Kenya	https://jiji.co.ke/	10409
Parley	Goldie Advanced Beauty Cream - Pearl & Shine	Kenya	jumia.co.ke	0,03
Parley	Goldie Advanced Beauty Cream - Pearl & Shine	Kenya	jiji.co.ke/	0,24
Face Fresh	Beauty Cream	Pakistan	daraz.pk	99,63
Face Fresh	Beauty Cream	Pakistan	Local market	828,75
Face Fresh	Beauty Cream	Pakistan	Manufacturer's website	368,99
Face Fresh	Beauty Cream	Pakistan	Facebook	528,94
Faiza	Beauty Cream	Pakistan	Facebook	2361,47
Faiza	Beauty Cream	Pakistan	Local market	2393,25
Faiza	Beauty Cream	Pakistan	www.daraz.pk	2806,25
Faiza	Beauty Cream	Pakistan	Manufacturer's website	2708,24
Golden Pearl	Beauty Cream	Pakistan	www.daraz.pk	2040,13
Golden Pearl	Beauty Cream	Pakistan	Local market	2267,49
Golden Pearl	Beauty Cream	Pakistan	Manufacturer's website	2149,06
Golden Pearl	Beauty Cream	Pakistan	Facebook	1923,94
Goree	Beauty Cream with Lycopene	Pakistan	www.daraz.pk	2593,42
Goree	Beauty Cream	Pakistan	Facebook	3257,17
Goree	Beauty Cream with Lycopene	Pakistan	Local market	3707,12
Parley	Goldie Advanced Beauty Cream - Pearl & Shine	Pakistan	Manufacturer's website	2960,45

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BRAND NAME	PRODUCT NAME	COUNTRY OF PURCHASE	PLACE OF PURCHASE	MERCURY CONTENT (IN PPM)
Parley	Goldie Advanced Beauty Cream - Pearl & Shine	Pakistan	daraz.pk	2553,57
Parley	Goldie Advanced Beauty Cream - Pearl & Shine	Pakistan	Facebook	3083,76
Aneeza Gold	Beauty Cream with Avocado & Aloe Vera	Philippines	lazada.com.ph/	6164,5
Faiza	Beauty Cream	Philippines	https://www.lazada.com.ph/	14320
Golden Pearl	Beauty Cream	Philippines	shopee.ph/	9670
Goree	Beauty Cream with Lycopene	Philippines	https://shopee.ph/	19301
Parley	Goldie Advanced Beauty Cream - Pearl & Shine	Philippines	shopee.ph/	13999
Face Fresh	Beauty Cream	U.S.	axabeautyshop.com	1900
Face Fresh	Beauty Cream	U.S.	aleenacosmetics.com	2200
Faiza	Beauty Cream	U.S.	aleenacosmetics.com	15000
Faiza	Beauty Cream	U.S.	axabeautyshop.com	15000
Golden Pearl	Beauty Cream	U.S.	aleenacosmetics.com	17000
Golden Pearl	Beauty Cream	U.S.	axabeautyshop.com	17000
Goree	Beauty Cream with Lycopene	U.S.	axabeautyshop.com	15000
Goree	Beauty Cream with Lycopene	U.S.	aleenacosmetics.com	24000

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## Annex G - Cost per country and per brand

With regard to SWC cost, pricing data showed wide variations between countries, with significantly higher costs in export markets such as the U.S. The average cost was highest in the U.S. at \$11.39 per item, while in Pakistan, the same creams were sold for as little as \$1.89. On the other hand, within the same country, the different products tended to have similar prices.

The table below presents the average cost in USD of Hg/SWCs by brand and by country. As for the figures above, when the same product was purchased multiple times within a country, the average price was calculated.

It should also be noted that all creams from Kenya, the Philippines and the U.S. were purchased from online platforms, whereas the creams purchased from Pakistan, although from different channels (e.g., local shops or online), had a significantly lower cost.

Average cost per country and per brand for Hg/SWCs in USD (xe.com exchange rate on 1 July 2025)

Brand names	Kenya	Pakistan	Philippines	U.S.	Average
Aneeza Gold	4,90	0,00	6,02	0,00	5,46
Face Fresh	0,00	1,65	0,00	14,02	5,78
Faiza	6,18	2,15	7,31	11,77	5,76
Golden Pearl	8,32	1,52	5,00	10,70	5,10
Goree	0,00	2,12	5,38	12,31	6,06
Parley	0,00	2,93	9,87	0,00	4,67
Average	6,40	2,02	6,72	12,20	5,52

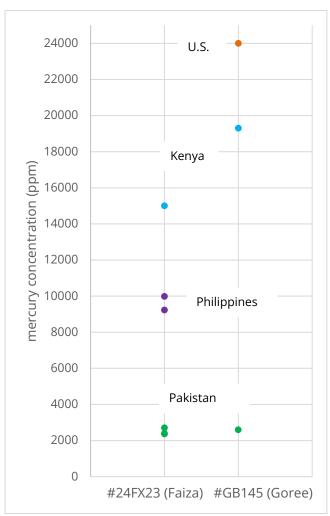
## Annex H - Mercury concentration in tested SWCs

Mercury concentration varied significantly by brand, country of purchase, and within SWCs. There is no certainty however, why the same product has different levels of mercury concentration depending on the country of purchase or laboratory where tested.

When multiple samples of the same product were purchased within a country (from different sellers), an average value was calculated. The table below presents the average mercury concentration (in ppm) for each brand across the four countries included in the study. The creams purchased in the United States generally showed higher mercury levels, while those sold in Pakistan tended to have lower concentrations. Average mercury concentration in the U.S. was more than 13,300 ppm, closely followed by the Philippines, while the SWCs sold in Pakistan contained on average about 2,800 ppm of mercury. Among the brands, Aneeza Gold and Goree consistently showed the highest mercury concentrations across multiple countries.

Analysis also revealed discrepancies in mercury levels across different samples of the same SWC. For example, the Parley Goldie SWCs had mercury concentrations ranging from 0.03 ppm to 13,999 ppm, coming from different batches.

In reviewing the batch numbers, it was observed that a cream with a specific batch number and brand name could be found in different countries. In all cases it had a high content of mercury.



Mercury concentration per batch number

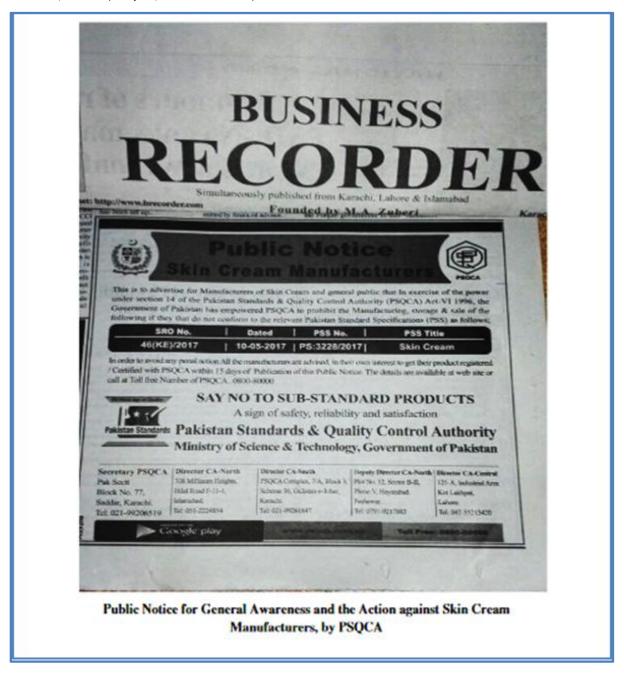
During the investigation, it was observed that some SWCs carried the same batch number. It is notably the case for Faiza with the batch number 24FX23, that was observed on the packaging of five creams in Kenya, the Philippines and Pakistan, and for Goree, with the batch number GB145, observed in three creams purchased in the U.S., Kenya and Pakistan.

However, creams with identical batch numbers showed differences in mercury content. For example, the Goree Beauty Cream of this specific batch had a mercury concentration of approximately 2,000 ppm in samples purchased in Pakistan, whereas the same batch sold in the United States contained 24,000 ppm.

While these discrepancies may pose questions on the different conditions and methodologies used, they certainly show and confirm the high level of mercury pointing to the fact it has been intentionally added. While there may be a discrepancy, the creams with the same batch numbers did have mercury above the regulated levels. Furthermore it can be seen that creams with the same batch number are widely available. These observations are reflected in the figure to the left.

#### Annex I - Public Notice Published in Pakistan

Public Notice for General Awareness and Action against Skin Cream Manufacturers," Karachi, Sindh (PSQCA, 2017/Annex 4)



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#### Annex J – Identification of possible manufacturers of mercury-added SWCs

The table below provides an indication of companies that may possibly be producing mercury-added SWCs. This table is drawn from an MPP submission to the Minamata Secretariat, dated 30 June 2024, and is largely drawn from earlier work of the Zero Mercury Working Group, proactive governments and others. As in-country confirmation is required in all cases in order to confirm that a company is manufacturing mercury-added SWCs, the listings below should serve only as a starting point for potential verification by host countries and relevant organizations.

#### Mercury-added SWCs and listed manufacturers

Country	Product	Hg	Producer	Detention list	Photo
Pakistan	Faiza Beauty Cream	(ppm) 28,500	Poonia Brothers Pvt. Ltd) 10km Hafizabad Rd. Qila Didar Singh ,Gujranwala, Pakistan; Telephone 92 300 9644407	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/search?resetSe arch=true	BEAUTY CREAM  ADVANTAGE  Remove Plumple, Prochler & Spess Relines your Beauty and Beauty
Pakistan	Sandal Whitening Beauty Cream	13,100	MMC Cosmetics Pakistan Main Bazar Rd , Karbirwala, Khanewal Pakistan	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/search?resetSe arch=true https://www.fda.gov/consum ers/health-fraud-scams/skin- products-containing- mercury-andor- hydroquinone NYC Dept. Health	CONTROL OF THE PROPERTY OF THE

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Pakistan	Parley Beauty Cream	19,221	Parley Cosmetics Lahore, Punjab, Pakistan https://www.facebook.com/parleycosm etics/	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/search?resetSe arch=true, HSA (Singapore)	Parley Beauty Cream  Discovery Visions  Resident States  Branch St
Pakistan	Stillman's Skin Bleach Cream	16,400	No. 143, 18th East Street, Phase I, DHA Karachi 75500 tel (021) 35892551 info@stillmansbeauty.com https://stillmansbeauty.com/about/	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/webReport/ale rtDetail/110720?lang=en NYC Dept. Health	EXPRESSION SERVICE AND SERVICE
Pakistan	Face Fresh	25,400	Shaheen Cosmetics PVT LTD Date Published: 11/13/2019 House #8, Block-A4, P.G.E.C.M.S Punjab Society, Lahore, Punjab PAKISTAN <a href="https://facefresh.com/">https://facefresh.com/</a>	https://www.accessdata.fda.g ov/cms_ia/importalert_137.ht ml RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/webReport/ale rtDetail/395133?lang=en, Philippines FDA	FRESH FIRE
Pakistan	Golden Pearl Beauty Cream	12,000	Golden Pearl Company 115/1 M , Quaid-e-Azam Industrial Estate , Kot Lakhpat, Lahore, Punjab PAKISTAN https://goldenpearl.com.pk/company/	https://www.accessdata.fda.g ov/cms_ia/importalert_137.ht ml, RAPEX: https://ec.europa.eu/safety- gate- alerts/screen/search?resetSe arch=true, Philippines FDA	Golden Peart Beauty (rean

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Pakistan	Due Whitening Beauty Cream	19,930	Kreative Cosmetics Private LTD Address House # 1044-B, Near Edhi welfare Centre, B-Block, Setellite Town, Rawalpindi, Punjab 46000 Registered in Islamabad, Pakistan http://info- pk.com/kreative_cosmetics _pvt_limited/38357/	RAPEX: https://ec.europa.eu/safety- gate- alerts/screen/search?resetSe arch=true, Philippines FDA	Due BEAUTY GREAM
Pakistan	Chandni	30,146		NYC Dept. Of Health, RAPEX: https://ec.europa.eu/safety-gate-alerts/screen/search?resetSearch=truehttps://www.fda.gov/consumers/health-fraud-scams/skin-products-containing-mercury-andor-hydroquinone	Chandni Whitening CREAM
Pakistan	Goree Beauty Cream	15,000	Goree Cosmetics 222 cca FF, DHA Phase 4 Sector CCA Lahore, Pakistan  https://goreecosmetics.com/	https://www.accessdata.fda.g ov/cms_ia/importalert_137.ht ml, Brunei Darussalam, HSA (Singapore), Philippines FDA	BEAUTY CREAM WINDCORPM

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Pakistan	NOOR Herbal Beauty Cream	21,700	Noor Gold Cosmetics 22/2 Main Naseer-U-Din Road, Islampura Near Ghousia Gunj Buksh Masjid, Lahore, Pakistan. +92 321 9432054 info@noorgoldcosmetics.com https://noorgoldcosmetics.com/product /noor-herbal-beauty-cream/	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/webReport/ale rtDetail/10007235?lang=en	NOOT HEAD WE AND A STATE OF THE
Pakistan	New Face Whitening Cream	25,400		RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/webReport/ale rtDetail/10007235?lang=en	Methods with edits wit
Pakistan	Utman, Seven Herbal	5.4	Corporate Office Information: Info@chepak.com.pk Email: Business@chepak.com.pk Email: chepakmarketing@gmail.com Tel +92-335-9207777  https://sevenherbal.com	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/webReport/ale rtDetail/10000193?lang=en UK Product Recall	Constitution of the second of

Country	Product	Hg	Producer	Detention list	Photo
	name	(ppm)			
United Arab Emirates	Aneeza Gold Beauty Cream	12,400	Aneeza Cosmetics Al Dagaya Building Deira Dubai U.A.E Phone: +92-300-4066558 / +971-50- 9460181 Email: aneezacosmetic72@gmail.com It is a Dubai based company which exports to over 60 countries including: Africa, Gulf Cooperation Council, Indonesia, Malaysia, Bosnia, Singapore, Philippines, India, Bangladesh, Iran, Afghanistan and Central Asia Countries <a href="https://aneezacosmetics.com/contact-us/">https://aneezacosmetics.com/contact-us/</a>	Phillipes FDA, RAPEX; https://ec.europa.eu/safety-gate-alerts/screen/webReport/alertDetail/10000193?lang=en	Anceza GOLD BEAUTY CREAM Removes Acne, Pimples, Spots & Dark Circles with Avocado & Aloe Vera
Mexico	Crema Aquamary		Aguaruto Cosmetics/Gloria Maricela Castro; Josefa Ortiz De Dominguez 126 Oriente , Colonia Tierra Blanca , Culiacan, Mexico	https://www.accessdata.fda.g ov/cms_ia/importalert_137.ht ml	
Mexico	La Tia Mana Crema	5,432	ventas@latiamanaoficial.com tel. (844) 593-4947 https://www.facebook.com/Latiamanaoriginal/	https://www.fda.gov/consum ers/health-fraud-scams/skin- products-containing- mercury-andor- hydroquinone	MA LIMPIADORA Y CURATIVA PARA PARO, ACTOR VICTOR PARA PARO, ACTOR VICTOR PARA PARA PARA PARA PARA PARA PARA PA

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Thailand	Kim Whitening Cream	1,470	Kim Co, LTD 888/32 Bang Pree Industrial Estate , Samut Prakan, Samut Prakan Thailand	https://www.accessdata.fda.g ov/cms_ia/importalert_137.ht ml	ASUIDIUM WHITENING PRAHI AND SINGHALDING CHEAM SHIP WHITENING PRAHI AND SINGHALDING CHEAM
Thailand	POP Popular Facial Cream	220	SMILEPHAN COMPANY LIMITED 432, Soi Phrayamonthat 35-9, Bangbon, Bangkok, Thailand 10150 Tel: (+66) 2 4178550, (+66) 2 4178551, (+66) 2 4178552, (+66) 2 8953820 Fax: (+66) 2 4178545  https://www.smilephan.com/about-us/	London Trading Standards; https://www.brandsynario.co m/pakistani-beauty-brands- exposed-bbc-complete-list- toxic-fairness-creams	P()P POPULAT FACIAL GREAM 宝美娜果精珍珠蕾
Thailand	White Rose Whitening Cream	9,835	Tanapatra Cosmetics, Thailand  https://ipen.org/sites/default/files/docu ments/EARTH%20Hg%20in%20 Whitening%20-%20Report.pdf	U.S. state of Minnesota	When the same of t
Lebanon	Diana	13,600	1st Flr. Borghol Bldg. Ahmad Al-Assaad Street Mar Elias, Jnah Beirut, 2047 5713 Lebanon Tel: + 961 1 851 222 Fax: + 961 1 851 333 Cell: + 961 3 233 011 https://www.dianacosmetics.com/content/about-us.html	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/webReport/ale rtDetail/10000193?lang=en	Diana  Siretus Diana  Grane C.T.R.  Diana  AMELIORI LASPICT DISTRACES OF ELECTRICAL PROCESSER FET DACKE NET WYT. 30 g E-/ 1 Oz

Country	Product	Hg	Producer	Detention list	Photo
	name	(ppm)			
Bangladesh	Lata Herbal	8.500	Word No. 40, Road 06, Holding 04, Block		
	Skin Bright		B, Mohalla mazukhan, Thana Pubail,		[7/ 1/ 1/2]
	Cream		Dist Ghazipur, 1721, Bangladesh.		(minus)
			Phone: +88-02-9613064		160
			Mobile: +88-01711 948576		लवा शववाल
			Mobile: +88-01819 808155		শীগরার্থ্য নীল
			Fax: +88-02-9613064		
			Email : lataherbalco@yahoo.com		<b>A A B B W</b>
			Email : info@lataherbalbd.com		MATURAL SARE
			Website: www.lataherbalbd.com		
			Sister concern		
			www.lciprivatltdbd.com		
			www.latacosmeticsindustriesltdbd.c		
			<u>om</u>		
			www.lciprivatcobd.com		
			www.latacosmeticsindustriescobd.c		
			<u>om</u>		
			www.lataherbalcobd.com		
I					
			https://www.lataherbalbd.com/		

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Jamaica	DeLuxe Silken Cream	7,400	Abrahams E W & Sons Ltd Address: 35 Hagley Pk Rd Kingston 10, Kingston Address: Kingston, Jamaica Telephone: 926-1585  https://www.bizexposed.com/Jamaica/B /Abrahams_E_W_and_Sons_Ltd- Kingston.php	RAPEX, NYC Dept.of Health	NON-OILY deluxe Silker Bleaching Cream FOR OILY OR NORMAL SKIN Ammoniated Mercury 3%, NET WT 63 g (2 1/4 0Z.)
Phillipines	RDL Cream	5,958	RDL Pharmaceutical Laboratory, Inc. Diversion Road, Catitipan, Buhangin, Davao City, Davao del Sur. Philippines, 8000  http://rdlpharmaceutical.com.ph/	HSA (Singapore)	Whitening Treatment  Day and Night Cream B Days Treatment  Whitening Tre
Mexico	Nunn Care	1,500	Miligros Cosmetics	U.S. states of California, Minnesota	NUNN CARE
Malaysia	Temul-awak Beauty Whitening Cream	6,500	Contact info. to distributor in Indonesia: 0857–0254–3333 <a href="https://creamtemulawak.tokocepek.co">https://creamtemulawak.tokocepek.co</a> m/		temperation at a constituent of the constituent of

Country	Product name	Hg (nnm)	Producer	Detention list	Photo
Indonesia (???)	Natural 99 Vitamin E Plus	(ppm) 28,000	Unknown producer, but the product seems to be shipped from Indonesia.E.g. https://www.tokopedia.com/vildankosmetik/natural-99-vitamin-e-plus-aslihttps://shopee.co.id/CREAM-NATURAL-99-VITAMIN-E-100-ORIGINAL-i.38191671.765191879		VRAL 99 VITURAL 91 VITURAL 91 VITURAL 92 VITURAL 92 VITURAL 92 VITURAL 93 VITURAL 94 VITURAL 95 VITURA 95 VIT
China	Collagen Plus Vit E Night Cream	2,700	Foshan Yo Beauty Trade Co., Ltd. 26 Changgang South Road, Lion Hill Town, Nanhai District, Foshan, China 86-18607705859 https://yobeautyskincare.en.made-in- china.com/product/OKXngZVvQlYd/Chin a-Collagen-Vit-E-Plus-Whitening-Beauty- Day-and-Night-Cream.html		Collagen  Pois To Signification  Collagen
China	Jiaoli Cream	5,582	Harbin Gelidai Jiaobao Cosmetic Company Ltd Manufactured by: Harbin Gelidai Jiabao Cosmetics Company Ltd. Address: No. 69, Erdao Street, Nanyuan. Production Permit: XK16-108 3097 Hygiene Permit: 97 Wie-Zhuang Approval: No. 15 XK-007 Special Permit: (2000) No. 0006 https://www.slideshare.net/v2zq/yzd568 (https://jezzanepomoceno.wordpress.co m/2012/05/10/beware-beauty- products-contain-toxic-chemicals-fda/)		Reny's

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Côte d'Ivoire	Carotone Black Spot Corrector	932	NP Ghandour Cosmetics Ltd  https://www.npgandour.com/product/cr eme-black-spot-corrector-carotone/	RAPEX; https://ec.europa.eu/safety- gate- alerts/screen/search?resetSe arch=true	MAXI EFFECT CONCENTRATO ROBBILLA LIGHT NATURAL CAROTONE
S. Korea	Yehwada M White Ginseng Collagen Pearl Capsule Cream		Hosting service provider: The Face Shop Nature Collection: 080-800-3350 Offline (store) related inquiries LG Household & Health Care: 080-023-7007 The Face Shop: 080-050-3300 Face Shop Ltd., Korea  (https://3.bp.blogspot.com/- nfbRdZM2QSY/WCkbCo3_sll/AAAAAAAA Uj4/RWnujQhiU- WDl_n1KlBowOQjs45RNYwCEw/s1600/2 0161104_135345.jpg)		VEHVADAM  VEHVAD
Taiwan	JiaoBi Whitening set	10,000	Taiwan International Group Company Li Liang skin cosmetics development, for Bi Jiao in Beauty Cosmetics International Group Company Address: Hongkong No. 568 Nathan road in Mong Kok Kowloon Chinese commercial center 12 floor (http://jiaobichinaproduct.weebly.com/)		THE REAL PROPERTY OF THE PROPE

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Taiwan	Green Tea Whitening Anti-freckle Cream	5,068	Hua Thu Li (?) or Hua Shu Zi (?)(https://blufashionbd.com/product/gr een-tea-whitening-anti-freckle-cream/) (https://vatgia.com/2466/6659961/kem- green-tea-hua-shu-li-seven- day.html)Supplier of ingredients may be in China: Guangzhou Green Canyon Biotechnology Co., Ltd. (see https://lancou.en.alibaba.com/company _profile.html? spm=a2700.9099375.35.3.3e293fe4nGM 7AK#top-nav-bar)		Seven-day Gen Taa Whlening Anti-freckle cream Net 2g Anti-freckle cream
Taiwan	Hua yue nong - Egg White and Cherry 7 Days Whitening Cream	10,000	Spring International Cosmetic Group, Gaoxiong, Taiwan or: Yudantang International Cosmetic Group, Gaoxiong, Taiwan. The latter company has a wide range of skin-lightening products. (https://royalbee.lk/hua-yue-nong- 7days-freckle-white-cream-25g)		E is one sun nader the gentle formula keeps your son set has a chief Spring coming one you new beauty file.  Egg white 8 Cherry 計畫者 學榜样學  T Lars sender immoration receives whether the sender immoration receives a send
Hong Kong	Gemli Gluta- thione Grape-seed Extract (Day Cream)	1,565	Sanli International Cosmetic Group Co.,Hong Kong  https://www.hkgbusiness.com/en/co mpany/Sanli-International-Group- Hong-Kong-Limited	Philippines FDA	Grant

Country	Product name	Hg (ppm)	Producer	Detention list	Photo
Domician Republic	Crema Blanquea- dora Whitening Cream Lisso	260	Laboratorios Lisso, C por A Ctral 10, La Rosa, Santo Domingo (809) 534-0642  https://www.paginasamarillas.com.do/c osmeticos/santo-domingo/laboratorios- lisso/info/es	https://www.accessdata.fda.g ov/cms_ia/importalert_137.ht ml	Crema Blanqueadora Whitening Cream  Lisso  NET. WI. 2 OZ

Mercury Policy Project, Overcoming Challenges of Banning Manufacture/Trade of Mercury Added Skin Lightening Products, Mercury Policy Project input to the invitation to submit information regarding mercury-added cosmetics pursuant to COP decision MC-5/5, June 2023. Available at: https://owncloud.unog.ch/s/NOq861kP4jB8c6J#pdfviewer

#### Annex K - "Cease and desist" letter from the New York Attorney General

Source: https://stateimpactcenter.org/files/AG\_Actions\_New\_York\_Cease\_Desist\_AleenaCosmetics\_10.07.2025.pdf



Office of the New York State Attorney General Letitia James Attorney General

October 7, 2025

Ammad Sarwar-Agent AleenaCosmetics Inc. 5 Gerard Avenue East Malverne, New York 11565

Aleena Cosmetics Inc. c/o Corporation Service Company 80 State Street Albany, New York 12207

Via Certified Mail, UPS Next Day, and Secretary of State

Re: Sale of Cosmetic Products
Containing Mercury

#### CEASE AND DESIST NOTIFICATION

To Aleena Cosmetics Inc:

The New York State Office of the Attorney General (OAG) has reason to believe that Aleena Cosmetics, Inc. (Aleena) has engaged and is engaging in repeated or persistent illegality within the meaning of N.Y. Executive Law § 63(12) by violating N.Y. Environmental Conservation Law (ECL) § 37-0117(8). Specifically, Aleena is offering for sale and selling in the State of New York cosmetic products that contain unlawful amounts of mercury, a chemical harmful to human health. The OAG obtained 32 separate containers of 17 products from Aleena (the list of products obtained is attached to this letter as Attachment A) and had them tested for mercury content by Legends Technical Services, Inc. (St. Paul, MN). The laboratory results from these products demonstrate that various cosmetic products that Aleena distributes, sells, or offers for sale, contain mercury that violate New York State law (see Attachment A).

ECL § 37-0117(8) prohibits the offer for sale or sale of cosmetic products containing more than "trace amounts" of mercury in the State of New York and

Environmental Protection Bureau | The Capitol | Albany NY 12224 518-776-2400 | ag.ny.gov

further provides that any permissible ("trace") amounts of mercury "shall be consistent with the permissible concentrations of trace amounts allowed by the [FDA]". The FDA defines a "trace amount" of mercury as less than 1 part per million. See 21 CFR 700.13(d)(2)(i)-(ii). Violation of ECL § 37-0117(8) is subject to a civil penalty up to \$1,000 for each day during which such violation continues for a first violation and up to \$2,500 for each day for a second violation. ECL § 71-3703(4).

Please promptly cease and desist from any further offering for sale or sale in New York State of any cosmetic product containing unlawful levels of mercury, including but not limited to the products specified in Attachment A. You are further directed to comply fully with Article 37 of the New York Environmental Conservation Law. OAG reserves its right to pursue any and all appropriate legal, equitable or administrative remedies to address any past or future violations of law and to issue investigatory subpoenas pursuant to Executive Law § 63(12) or any other applicable law.

We thank Aleena for its anticipated cooperation. Within the next five business days, please contact me to confirm your compliance. I would be happy to discuss any questions you may have.

Sincerely.

/s/ Marie Chery-Sekhobo
Marie Chery-Sekhobo
Assistant Attorney General
Environmental Protection Bureau
Office of the Attorney General of
the State of New York
The Capitol
Albany, New York 12224
P: 518-776-2414

E-Mail: marie chery-sekhobo@ag.ny.gov

#### Attachment A

# Concentrations of Mercury in Aleena Skin-Lightening Products Obtained by NYSOAG

Product	Number of Samples	Mercury Concentration(s) (ppm)
Due Beauty Cream	2	30,000; 25,000
Chandni Whitening Cream	2	28,000; 26,000
Noor Gold Beauty Cream	2	22,000, 20,000
Goree Beauty Cream	2	19,000; 19,000
White Gold Anti-Marks Cream Extra Brightening	2	19,000; 16,000
Infocus Professional Pearl Beauty Cream	2	18,000; 17,000
New Face Beauty Cream with Extra Whitening Strength	2	16,000; 15,000
Parley Goldie Advanced Beauty Cream Pearl Shine	2	14,000; 14,000
Golden Star Beauty Cream	2	14,000; 11,000
Faiza Beauty Cream	2	13,000: 13,000
White Pearl Plus Extra Whitening Treatment Cream	2	12,000; 7,100
Sandal Beauty Cream	2	11,000; 11,000
Golden Pearl Beauty Cream	2	8,200; 7,800
Fresh Skin Beauty Cream	1	7,300
Natural Face Beauty Cream	2	4,600; 3,900
Face Fresh Beauty Cream	2	1,400; 1,100
Zarwa Gold Whitening Cream	1	1,400

#### Annex L - Aleena Cosmetics urgent product recall

Source: <a href="https://aleenacosmetics.com/">https://aleenacosmetics.com/</a>



# VOLUNTARY RECALL A URGENT PRODUCT SAFETY NOTICE & VOLUNTARY

Aleena Cosmetics Inc.

**RECALL** 

m Posted: October 8, 2025

Aleena Cosmetics Inc. has **voluntarily discontinued and initiated a recall** of several cosmetic products previously sold on our website, **AleenaCosmetics.com**.

Testing by the **New York State Office of the Attorney General (NYSOAG)** has confirmed that these products contain **mercury at levels exceeding U.S. and New York State legal limits**.

This recall is being conducted **immediately**, out of an **abundance of caution** and in **full cooperation** with the NYSOAG. All affected products have been **removed from sale**, and we are taking every step to comply with all relevant safety and regulatory standards.

### 

If you purchased any of the following items, **stop using them immediately**, regardless of your location:

- Due Beauty Cream
- · Chandni Whitening Cream
- · Noor Gold Beauty Cream
- · Goree Beauty Cream
- · White Gold Anti-Marks Cream Extra Brightening
- Infocus Professional Pearl Beauty Cream
- New Face Beauty Cream with Extra Whitening Strength
- Parley Goldie Advanced Beauty Cream Pearl Shine
- Golden Star Beauty Cream
- Faiza Beauty Cream
- White Pearl Plus Extra Whitening Treatment Cream
- · Sandal Beauty Cream
- Golden Pearl Beauty Cream
- Fresh Skin Beauty Cream
- Natural Face Beauty Cream
- · Face Fresh Beauty Cream
- Zarwa Gold Whitening Cream







### CONSUMER ACTION REQUIRED

#### 1. Stop Use & Safe Disposal

Do **not dispose of these products in regular household trash**. Due to mercury content, please follow your **local** household hazardous waste disposal guidelines.

#### 2. Contact Us for a Remedy

Email or call us to arrange **compensation**. We will provide a **replacement** or a **compliant alternative** product.

### QUESTIONS & ASSISTANCE

If you need help with safe disposal or recall instructions, please contact us:

- **© Email:** aleenacosmetics@gmail.com
- **L Phone:** 347-801-4832

We are a small business and are monitoring these lines closely. We will respond as quickly as possible.

### Our Commitment to You

At Aleena Cosmetics, consumer health and safety are our top priorities. We deeply regret any concern or inconvenience caused. We are reviewing our entire supply chain to **strengthen quality controls** and maintain the trust and confidence of every customer.

Note: This recall applies to sales made within New York State. Customers in other states or countries should consult their local health or consumer protection agencies for guidance on safe disposal and product safety.







