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WOMEN ENVIRONMENTAL PROGRAMME (WEP)

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Secretariat of the Minamata Convention on Mercury

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Geneva, Switzerland

SUBMISSION OF INFORMATION ON CHALLENGES IN IMPLEMENTING THE OBLIGATIONS REGARDING MERCURY-ADDED COSMETICS

1. Introduction

Women Environmental Programme (WEP) respectfully submits this contribution in response to the call by the Secretariat of the Minamata Convention for information on challenges in implementing obligations regarding mercury-added cosmetics.

WEP is a Pan -African non-governmental organization working to advance environmental justice, gender equality, public health, and sustainable development.

Through our work on gender, chemicals, health, environmental justice, and community awareness, we have observed persistent challenges that hinder the effective implementation of obligations related to mercury-added cosmetics in Nigeria. These challenges affect not only environmental governance and public health systems but also disproportionately impact women and girls who are the primary consumers targeted by skin-lightening products.

2. Experience from WEP Work on Mercury-Added Cosmetics and Gender-Responsive Chemicals Management

Women Environmental Programme (WEP) has been addressing the impacts of hazardous chemicals on women, children, and vulnerable communities. Through advocacy, awareness-raising, policy engagement, and capacity-building activities, WEP has contributed to advancing gender-responsive chemicals and waste management in Africa.

In Nigeria, WEP has engaged women, youth, community-based organizations, civil society networks, and government stakeholders on environmental health, toxic chemicals, and the disproportionate impacts of pollution on women and children.

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Through these engagements, WEP has observed widespread use of skin-lightening products among women and young girls, often accompanied by limited awareness of the health risks associated with mercury exposure.

Through collaboration with government agencies, civil society organizations, development partners, and other stakeholders, WEP has participated in initiatives promoting mercury-free cosmetics, safer alternatives, consumer awareness, and stronger regulation of hazardous substances in products used by women. These engagements have revealed several implementation challenges, including:

- Limited public awareness regarding the presence of mercury in cosmetic products and its impacts on human health and the environment;
- The persistence of social norms and beauty standards that encourage the use of skin-lightening products;
- Difficulties in identifying mercury-containing products due to inadequate labeling and lack of accessible testing mechanisms;
- Continued availability of potentially non-compliant cosmetic products through informal markets, online platforms, and cross-border trade channels;
- Limited capacity among local communities and consumers to identify, report, and avoid hazardous products;
- Insufficient collaboration between public health, environmental, customs, and consumer protection institutions responsible for enforcement.

WEP's community-level engagement has further demonstrated that women are often both the primary consumers of skin-lightening products and key agents of change in promoting safer alternatives and protecting community health. Consequently, efforts to eliminate mercury-added cosmetics must incorporate gender-responsive approaches that address the social, cultural, economic, and health dimensions influencing product demand and use.

Lessons learned from WEP work indicate that successful implementation of the Minamata Convention requires not only regulatory controls but also sustained public education, community engagement, behavioural change interventions, women's leadership, and strengthened cooperation among governments, civil society organizations, academia, and the private sector.

3. Key Challenges

a) Low Consumer Awareness and Demand for Skin-Lightening Products

A significant challenge is the continued demand for skin-lightening and beauty products that may contain mercury. Many consumers, particularly women and young girls, are unaware of the health risks associated with mercury exposure, including kidney damage, neurological disorders, reproductive health impacts, and risks to unborn children.

Social and cultural pressures associated with lighter skin tones continue to fuel demand for skin-lightening products despite increasing awareness efforts.

b) Limited Capacity for Detection and Testing

There is inadequate access to affordable and rapid testing mechanisms for identifying mercury-containing cosmetics in markets and at points of entry. Regulatory agencies face constraints in

laboratory infrastructure, equipment, and technical capacity necessary for routine surveillance and enforcement.

This challenge limits the ability to identify non-compliant products and to generate reliable data on the prevalence of mercury-added cosmetics in the country.

c) Informal and Unregulated Distribution Channels

Mercury-added cosmetics continue to circulate through informal markets, small retail outlets, online platforms, and cross-border trade channels that are difficult to monitor. Products are often imported without adequate documentation, making enforcement challenging.

The growth of e-commerce and social media marketing has further expanded access to potentially harmful products while reducing opportunities for regulatory oversight.

d) Weak Enforcement and Resource Constraints

Although Nigeria has relevant regulatory institutions and legal frameworks, enforcement remains constrained by limited human and financial resources. Regulatory inspections are often insufficient to cover the extensive distribution networks through which cosmetic products are sold.

There is also a need for stronger collaboration among customs authorities, public health agencies, environmental regulators, consumer protection bodies, and law enforcement agencies.

e) Insufficient Data and Research

There is limited national data on:

- The scale of mercury-containing cosmetic imports;
- Consumer exposure levels;
- Health impacts among users;
- Market prevalence of non-compliant products;
- Supply chains facilitate importation and distribution.

The absence of comprehensive data limits evidence-based policymaking and targeted interventions.

f) Gender-Specific Vulnerabilities

Women and girls are disproportionately affected because they constitute the primary target market for skin-lightening products. Exposure to mercury-containing cosmetics raises significant concerns regarding maternal health, reproductive health, and child development.

Current interventions require stronger integration of gender-responsive approaches to address the social norms, marketing practices, and economic factors driving product use.

g) Inadequate Product Labeling and Transparency

WEP has observed that consumers often face difficulties in identifying potentially hazardous cosmetic products due to inadequate, incomplete, or misleading product labeling. In many instances, product labels do not provide clear information on ingredients, are written in languages not easily understood by consumers, or fail to disclose the presence of hazardous substances. Some products may also be falsely marketed as "safe," "natural," or "approved," creating a false sense of confidence among consumers.

The absence of harmonized labeling standards and effective market surveillance limits the ability of consumers to make informed choices and hinders enforcement agencies in identifying potentially non-compliant products. This challenge is particularly significant for skin-lightening products, where consumers may be unaware of the ingredients contained in products purchased through informal markets, online platforms, and cross-border trade channels.

WEP therefore emphasizes the importance of strengthening requirements for ingredient disclosure, improving product traceability, promoting transparent labeling practices, and enhancing regulatory oversight of cosmetic manufacturers, importers, distributors, and retailers.

4. Recommendations

WEP recommends the following actions:

1. Strengthen public awareness campaigns focusing on health risks associated with mercury-added cosmetics, with particular attention to women, girls, youth, and vulnerable populations.
2. Increase investment in laboratory infrastructure, screening equipment, and technical training for regulatory agencies responsible for monitoring cosmetic products.
3. Enhance cooperation among customs authorities, environmental agencies, health institutions, consumer protection bodies, and law enforcement agencies to address illegal trade and improve enforcement.
4. Support community-based monitoring and citizen reporting mechanisms to identify and report suspected mercury-containing products.
5. Promote regional cooperation within West Africa to address cross-border trade in prohibited mercury-added cosmetics.
6. Develop gender-responsive public health strategies that address the root causes of demand for skin-lightening products and promote positive body image and health-conscious consumer choices.
7. Increase technical and financial support for developing countries through Article 14 of the Convention to strengthen national implementation capacities.
8. Strengthen civil society participation and promote gender-responsive implementation: Parties and development partners should strengthen support for civil society organizations, women's organizations, and community-based groups that play a critical role in awareness raising, consumer education, community monitoring, and behavioural change efforts aimed at eliminating mercury-added cosmetics and promoting safer alternatives.
9. Provide clear, accurate, and easily understandable ingredient labels: Governments should require cosmetic manufacturers and importers to provide clear, accurate, and accessible ingredient labeling, including disclosure of substances restricted or prohibited under the Minamata Convention. Regulatory authorities should strengthen market surveillance and take action against misleading claims, false labeling, and products that fail to meet

ingredient disclosure requirements. Public awareness campaigns should also educate consumers on how to identify and avoid potentially hazardous cosmetic products.

5. Conclusion

WEP welcomes Decision MC-6/4 and commends the continued efforts of the Conference of the Parties to address the global challenge posed by mercury-added cosmetics. Our experience demonstrates that eliminating mercury-added cosmetics requires a comprehensive approach that combines effective regulation and enforcement with public awareness, community engagement, gender-responsive interventions, and strengthened international cooperation.

We encourage the Secretariat and Parties to prioritize support for awareness raising, laboratory and enforcement capacity, regional cooperation to address illegal trade, and the development of gender-responsive public health strategies. Particular attention should be given to addressing the social norms and market dynamics that sustain demand for skin-lightening products among women and girls.

WEP remains committed to supporting the implementation of the Minamata Convention and contributing to efforts that protect human health, promote environmental justice, advance gender equality, and eliminate mercury-added cosmetics from markets and supply chains that facilitate the importation and distribution.



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Submitted by:

A handwritten signature in blue ink, appearing to read "Priscilla M Achakpa". The signature is stylized and fluid.

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