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Sustainable Development Policy Institute

Minamata Convention Compliance in Pakistan: Role of Dermatologists and Regulatory Authorities

27th SDC Panel Discussion Report



Minamata Convention Compliance in Pakistan: Role of Dermatologists and Regulatory Authorities

27th Sustainable Development Conference

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27th
SDC

Minamata Convention Compliance in Pakistan: Role of Dermatologists and Regulatory Authorities

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Acknowledgement

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We also wish to thank EEB and the Zero Mercury Working Group (ZMWG) for their generous technical and financial support, enabling us to host this event on such a prestigious platform.

Acronyms

ASGM	Artisanal Small Scale Gold Mining
DRAP	Drug Regulatory Authority of Pakistan
EGRAS	Euro Gate Regulatory Alert System
EPA	Environmental Protection Authority
FBR	Federal Board of Revenue
GEF	Global Environment Facility
IETC	International Environmental Technology Center
Mo CC	Ministry of Climate Change
Mo NHR&C	Ministry of National Health Services, Regulations & Coordination
PAD	Pakistan Association of Dermatology
PNAC	Pakistan National Accreditation Council
PSQCA	Pakistan Standards & Quality Control Authority
SWCs	Skin Whitening Creams
SLCs	Skin Lightening Creams

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Background

The World Health Organization (WHO) has listed mercury as one of the top ten chemicals of public health concern¹. The use of mercury, in cosmetics - particularly for its skin-whitening effects - has been documented since the 19th Century² across the globe, including in developing countries. In South Asia, obsession with fair skin is deeply rooted in cultural and social norms, where lighter skin is often associated with higher social status and greater acceptability, especially for women. This preference for fair skin is likely influenced by the region's colonial history, where the ruling class's lighter skin was perceived as a symbol of power and superiority. Today, this desire for lighter skin is further fueled by the booming market for skin-whitening products and the relentless promotion of these products through extensive electronic and print media campaigns. Unfortunately, many campaigns associate fair skin with success in both professional and personal life, significantly influencing the younger generation.

Even though mercury and mercury salts, such as mercurous chloride and oxides, are prohibited in skin lightening products due to their toxicity and harmful effects on human health, their production and continued use remain a serious public and global health concern. According to the U.S. Food and Drug Administration (FDA) and other regulatory authorities, including those in Pakistan, mercury content of skin-whitening creams (SWCs) should be less than 1 part per million (ppm) as a standard. However, [a report by the World Health Organization \(WHO\) in 2013](#) revealed that many SWCs manufactured in Pakistan contain higher mercury content than recommended. [Pakistan is a party to the Minamata Convention](#)³, committing to phasing out and banning all cosmetics, including SWCs, containing more than 1 ppm of mercury. This commitment was reaffirmed at the [Conference of the Parties \(COP5\) in 2023](#), where the agenda to phase out and ban mercury-containing skin-whitening creams was stressed. However, these products are still openly available in the market without undergoing prior checks for mercury content, despite existing standards and regulations, thereby exposing the public to their hazardous effects.

As Pakistan has ratified the Minamata Convention and the Ministry of Climate Change & Environmental Coordination (MOCC&EC) is the custodian of this convention, certain interventions have been made, but these need to be further enhanced through expert input. To address this, it is essential to seek the opinions of dermatologists on the use of SWCs and to assess the prevalence of related health complications among their patients. In line with this objective, this panel discussion will focus on understanding the current situation and exploring strategies to phase out and ban mercury-containing SWCs in Pakistan, in support of the Minamata Convention's implementation and enforcement. Broader themes under discussion will include:

¹ <https://www.who.int/news-room/fact-sheets/detail/mercury-and-health>

² https://sdpi.org/chemicals-and-health-assessment-of-prevalence-of-health-complications-and-skin-diseases-due-to-mercury-containing-skin-whitening-creams-swcs-use-among-the-population-at-selected-cities-of-pakistan/project_detail

³ <https://minamataconvention.org/en/parties>

Extent and Severity of the Problem

- Prevalence of mercury use in skin-whitening products
- Common health complaints and conditions observed in clinical practice

Public Awareness and Education

- Current level of public knowledge about the hazardous effects of mercury in cosmetics
- Effective strategies for increasing awareness through campaigns and educational programs

Legislative and Regulatory Measures

- Evaluation of existing laws and regulations regarding mercury use in cosmetics
- Enforcement of bans on mercury-containing SWCs
- Importance of accurate labeling and disclosure of product contents

Roles and Responsibilities of Key Stakeholders

- **Health Regulatory Authorities:** Implementing and monitoring compliance with safety standards
- **Dermatologists:** Advocating for safe practices and guiding patients towards healthier alternatives
- **Academic Institutions:** Conducting research to support policy making and educating future professionals
- **Civil Society Organizations:** Supporting advocacy efforts and community engagement

Implementation of the Minamata Convention in Pakistan

- Progress and challenges in aligning national policies with the convention's guidelines
- Collaborative efforts required to effectively phase out mercury use in cosmetics.

Moderator: Dr. Razia Safdar (Senior Policy Advisor, SDPI)

SDPI has been working on mercury content of Skin Whitening Creams since 2016. According to well acclaimed research at SDPI by the late Khawaja Mahmood, more than 90% of creams contained mercury more than 1PPM (standard) and some contained in thousands⁴. According to recent reports, (EIA) Pakistan is one of the producers and exporters of skin lightening products that contain mercury exceeding permissible level⁵. It is important to highlight the barriers in implementing the regulation for restricting or banning this hazardous chemical along with recognizing the role of regulatory authorities and the dermatologists/ practitioners. Institutional arrangements, financial arrangement and allocation,



⁴ https://sdpi.org/chemicals-and-health-assessment-of-prevalence-of-health-complications-and-skin-diseases-due-to-mercury-containing-skin-whitening-creams-swcs-use-among-the-population-at-selected-cities-of-pakistan/project_detail

⁵ https://eia.org/wp-content/uploads/2023/10/EIA_US_Mercury_in_SLP_report_0923_EIA_report_0208.pdf

trained human resource and evidence-based research are the most important elements for enabling the environment in effective policy implementation.

Pakistan is a party to Minamata convention since 2020 and this prohibits the manufacturing, and trading of mercury added products. Mercury is the third most hazardous chemical impacting human health and environment. Mercury is present in skin whitening creams, soaps, and cosmetics. These products have high mercury that is more than 1ppm. According to the MIA report 2019, 61% of the mercury present in the environment is intentional use in consumer products.⁶

Mercury toxicity can be manifested in the form of common symptoms which makes it difficult to identify. These include headache (47%), mood swings (41%), insomnia (38%), fatigue (34%), memory loss, depression and difficulty in concentrating (19- 28%).

In South Asia, including Pakistan, beauty is defined as fair skin which is linked to success, confidence, high social acceptance, and marriage. Therefore, it has been studied by Environmental Investigation Agency (EIA) that Pakistan is one of the major producers, importers and exporters of mercury containing SWCs and contributors to mercury toxicity via cosmetics industry. Brown women and unborn offspring are affected the most due to usage of mercury containing products. Zero Mercury Working Group (ZMWG) identified 164 skin lightening products globally that contain mercury whereas 97 of them are documented in the market.

Regarding legislation and regulations on mercury in Pakistan, the Ministry of Climate Change is the custodian of Minamata Negotiation and Compliance. In 2017, PSQCA, who is responsible for implementation of restrictions and standards revised the standard on mercury in cosmetics. Under the banner of National Hazardous Waste Management Policy and National Chemical Control Act by M/o CC, the mercury imports are monitored. The legislation and enforcement of standards of hazardous chemical disposal to reduce health risk is also a part of intersectoral policies and intervention for Universal Health Coverage (UHC) by Ministry of Health Pakistan.

Different public and private departments are responsible for the regulation of mercury added SWCs and its industry. This includes PSQCA, Drug Regulatory Authority of Pakistan (DRAP), Pakistan National Accreditation Council (PNAC), Punjab Quality Control Board, and Pakistan Environment Protection Agency (Pak-EPA). Recently, Pakistan General Cosmetics Bill/ Act 2023 was passed in which the newly formed Pakistan General Cosmetics Regulatory Authority, under the administrative control of M/o Science & Technology, is bound to work towards:

- Consumer safety and product quality
- Harmonization with International/local Standards: PSQCA
- Transparency and Accountability
- Public awareness for safe use
- Policy making and Market regulation
- Research and Development

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https://minamataconvention.org/sites/default/files/documents/minamata_initial_assessment/Pakistan-MIA-2019-EN.pdf

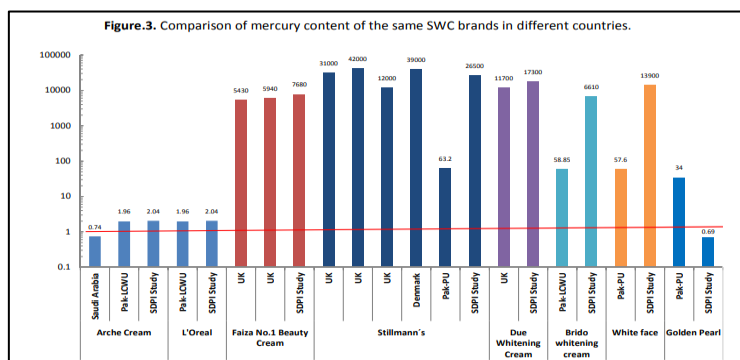
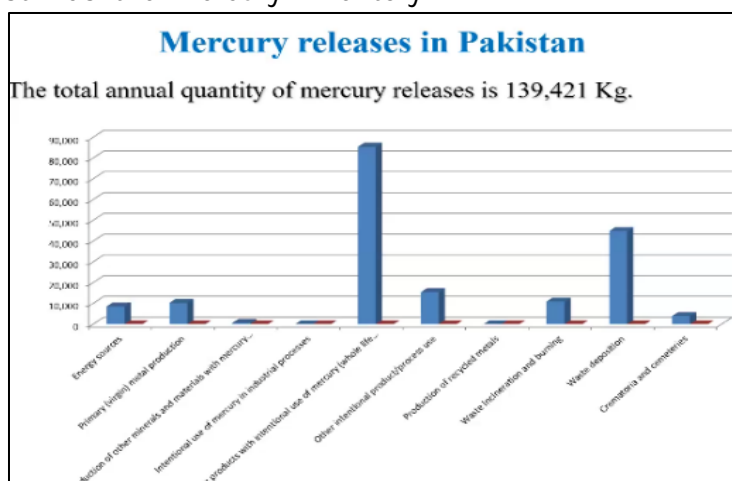
Compliance of Minamata Convention, Mercury Initial Assessment Report & Role of M/o CC & EC: Recommendations & Way forward

Dr. Zaigham Abbas (Director Labs & NEQS) Chair of the session

Dr. Zaigham Abbas opened the session with appreciation of SDPI for organizing this discussion. He first highlighted the progress Pakistan has made in phasing out mercury in 2 important industrial processes and consumer goods. These included the chlor-alkali industries which replaced mercury cells with electrical methods and the professional lighting industry where 2 renowned lighting companies: Khyber and Phillips replaced mercury containing compact fluorescent lamps with light emitting diodes (LEDs). The achievements so far by Mo CC& EC in this regard were also highlighted; first was the mercury inventory assessment in 2007⁷ and then the sectoral contribution in 2019 MIA report, where guidelines were issued for three important sectors: Health, Waste management and Lighting industry.



As part of the initial stage of Minamata convention compliance in Pakistan and before ratification, a detailed assessment of mercury consumption in key industries and sectors was carried out which contributed to the MIA report of 2019. It was found out that 39000kg of mercury was being used in various highlighted sectors. With the chlor-alkali and lighting industries now on the right path, the targets that MoCC presently has in front of it are mercury use in 2 domains: Health sector (thermometers, BP apparatus and dental amalgam) and mercury added products (batteries and cosmetics).



In cosmetics, skin whitening creams are a particularly serious threat with detrimental impacts on both health and the environment. Many investigative studies have been conducted in collaboration with SDPI, to assess the mercury content in skin whitening products and the health risks they pose. He mentioned the 2018 study of 59 local and international products which found that only three products adhered to the permissible mercury limits (<1ppm), while the rest contained excessive mercury levels. This issue was highlighted by the Ex-Minister of State in various social media campaigns and public platforms, with a particular focus on our society's obsession with fairness as a sign of beauty and social acceptance, which in turn fuels the demand for skin whitening products. He mentioned that highlighting such stereotypes did lead to some positive impact, as evident by the fact that the famous international brand 'Fair and Lovely' changed their name to 'Glow and Lovely.'

He further mentioned about his participation in the COP5 of the MCM held last year in Geneva, Switzerland. The main issue raised there by the parties was Pakistan being one of the main exporters of hazardous and cancerous mercury containing skin whitening creams. In this regard, the active participation of renowned NGO, Zero Mercury Working Group in collaboration with SDPI was highlighted, with two main objectives in mind: regulation of such SWCs to allow production of products with mercury only permissible by the set standards (<1ppm) and restriction of export of such toxic products to international markets.

Dr. Zaigham stressed the need for public awareness campaigns, mainly highlighting the role of dermatologists. He believed that this is the key technique for making the consumers aware of the harmful effects of mercury on both the health and environment, helping them transition to safer, environmentally friendly alternatives and safeguarding the health of the masses.

Pakistan Association of Dermatology (PAD) and Mercury Containing Skin Whitening Creams

Remarks by Dr. Naeem Raza (President, PAD)

The trend and desire to use the whitening creams is so rampant in Pakistan that every individual, female and males, have a desire to get their skin fair. The reason behind this is our cultural preferences and advocacy by the social media on how to look fair, bright and beautiful.

Because of weak legislation and regulations by the implementing authorities, the manufacturers are using toxic chemicals as ingredients in their production process, which are known to have harmful effects on human skin and also to fulfill the demands of the consumers. He accepted that dermatologists are equally responsible in promoting and prescribing skin whitening products to their patients, without knowing their true contents.

He added that it is important to create public awareness and to encourage the consumers to fully embrace their natural skin tone, a movement that requires the involvement of all prominent sectors and stakeholders (academia, regulatory authorities, practitioners, civil society organizations, etc.). He further added that it should be made mandatory for the manufacturers to disclose all the contents added in the skin creams and the dermatologists



and consumers, both, should know the ingredients of the cream that is being prescribed and consumed. He also suggested that prescribers, medical practitioners and cosmetic manufacturers need to be educated on the concentration of mercury content in such products.

Remarks by Prof. Dr. Nadia Ali Azfar

Dr. Nadia laid more emphasis on the role of social media in selling skin whitening and lightening products. Many patients who visit the hospital are in the habit of buying cosmetics or skincare products through online platforms and social media is promoting it very efficiently. To curb this around, it is important to put regulatory restrictions on pharmaceutical companies and the platforms promoting these campaigns through exhaustive advertising. To control and avoid social media in this regard, the marketing practices must be changed such as showing warning messages or warning notes and side effects on the packaging of the products or at the end of any advertisements displayed on any platform or social media.



She further added that to create better understanding of skin whitening and brightening agents among the medical students, this should be made part of the regular/ compulsory curriculum. This will result in more awareness about the usage of the correct product and treatments. On the other hand, seminars, workshops, and training should be conducted to create awareness at all levels regarding the harmful effects of the chemicals used in manufacturing of skin lightening and whitening creams as well as their dermatological effects. She advised that the intervention concerning phasing out mercury and discouraging the use of mercury added products should be initiated from the lowest level by engaging the general practitioners (GPs) because they are also prescribers.

Moreover, pamphlets, brochures and awareness notes should be made and distributed among the community. These products are sold over the counter and most commonly at medical stores, but the sale of whitening products should be completely stopped. The legislative and regulatory authorities should take actions through strict market surveillance and banning the sale of products that are completely defying the set standards. The pharmaceutical company, if found guilty of producing any banned products, should be fined heavily and penalized accordingly.

Dr. Nadia concluded and suggested that to bring a positive change in this aspect, stringent positive steps should be taken. For example:

- Research projects and investigative studies should be conducted in this area.
- Awareness about the adverse effects of using skin whitening and lightening should be created at all levels in academia.
- The regulatory authorities, associations of dermatology, and standards and quality control should be engaged and encouraged to play their role in imposition of restrictions on hazardous skin whitening and lightening products.

Remarks by Dr. Sadia Tabassum

Dr. Sadia briefly explained the concept of colorism that is discrimination based on the skin tone that is often between the same ethnic and racial groups. This ideology has its roots in the Colonial and European influences as well as the racism associated with enslavement of Africans in America, that is the class structure based on fair skin color, which is now associated with power and good opportunities. Nowadays, this concept of beautiful, fair skin is heavily promoted through advertisements and social media. Currently, we are dealing with three generations: Gen Z, Gen X and Gen alpha, and all these individuals are made conscious about their natural skin tone. It is extremely crucial to make people accept their skin tone the way it is and rid their minds of all such unhealthy thoughts.



Regarding the SWCs, she proposed that there should be at least one standardized lab in each city where all the creams for skin whitening and pigmentation are to be thoroughly tested for mercury content and other harmful substances such as steroids.

Education, awareness campaigns and controlling of media are the crucial elements in this movement as they are the main tools to break the stereotypes and encourage diverse skin tone in our society, ultimately fostering a healthier society for the generations to come.

Role of Pakistan Standards and Quality Control Authority

Remarks by Mr. Khawaja Ghulam Mohiuddin (Assistant Director/ In-charge Standards Chemical Division) and Dr. Iqra Sharafat (Assistant Director Technical, PSQCA)



Mr. Khawaja began by stating some important facts and the functioning mechanism of PSQCA. He said that cosmetics and related products are being manufactured extensively in Pakistan and briefly explained the regulatory and implementation process of PSQCA. The responsibility of PSQCA is to develop standards and the responsibility of Government of Pakistan is to notify it through Statutory Regulatory Order. Then, PSQCA being a certification body inspects the product and collects the samples for testing to ensure compliance with the approved standards and to issue license certificates accordingly. Regarding mercury, PSQCA has set the standard limit of 1 ppm in cosmetic products. Regarding export and import regulation, multi-stakeholder engagement with the certification and testing bodies is of high importance. The powers of PSQCA include issuing warnings to such substandard manufacturers and the authority to seal the company which is not complying with the local and international standards.

Dr. Iqra then took the floor by elucidating the challenges being faced in standardizing the skincare products by PSQCA:

i. The existence of the informal sector in the country is the main hurdle as it cannot be tracked, monitored and regulated.

ii. The demand for cheaper products by the consumer. This is because of two important reasons; (a) awareness and knowledge of the consumer and (b) financial capacity of the consumer made them more inclined towards purchasing cheaper products. She said that there should be an integrated approach by the price control authorities so that demand from the consumers can be fulfilled.

iii. The shortage of human resources for tracking and monitoring different products which are non-compliant with the standards.

iv. Lack of laboratories with advanced equipment particularly measuring the mercury content from the samples collected by PSQCA for inspection.

v. Manufacturer and consumer knowledge and education with regards to the adverse effects of using the SLPs as well as the standards that have been established for such products.

There are also certain interventions which are under consideration for streamlining the implementation process:

- i. Development of tracking and monitoring mechanisms to track the non-compliant products. This system would act as an active alert system for rapid and quick sharing of information. Such a system is already in place in Europe called Safety Gate: the EU rapid alert system for dangerous non-food products⁸. According to this system, whenever any product non-compliant to the standards is found, an alert message/ information is generated to the European Commission which further conveys it to all the members and sometimes the information is made public as well. In Pakistan, PSQCA is making efforts to establish such a system at the regional level.
- ii. Stringent regulations for enforcements of legislation and the standards under 3228/2017 (3rd amendment) will be developed for the compliant and non-compliant products, with the help of the newly formed Pakistan General Cosmetics Regulatory Authority (PGCRA).
- iii. She also mentioned conducting a research study to check the SWCs, different variants of these and the presence of mercury content in the creams that are available in the market. PSQCA can help in field operation, sampling and other research related activities. There are many other cosmetic items like the eye cosmetics (surma, kajal, etc.) which are not compliant with the defined standards. Joint efforts of all the stakeholders are required in this regard to regulate the mercury and other hazardous chemicals in skincare products.



⁸ <https://ec.europa.eu/safety-gate-alerts/screen/search?resetSearch=true>

Dr. Iqra concluded by focusing on several main points: Training session for the manufacturers, for awareness and on manufacturing mercury free skin whitening products, should be conducted with the involvement of all the stakeholders. Steps should be taken for mass awareness and education so that these collective efforts can be fruitful.

Role of Dermatologists

Remarks by Dr. Tahira Shahid (Aesthetic Physician/ Health Activist)

Dr. Tahira agreed that it was high time for such an integral discussion to take place and be inculcated into the minds of the masses. She said that fair skin has become ideal for society because fair skin tone is always given preference in case of marriage, employment opportunities and general acceptability in society. Being in contact with the showbiz industry, she even gave examples of several famous celebrities who changed their appearance in the pursuit of such a stereotype and highlighted the fact how dark-skinned actors are associated with negative roles in television series. It is important to bring a huge revolution to change the mindsets of people obsessing about having fair and bright skin and encouraging them to accept and remain satisfied with the natural skin tone.



She informed the audience that health practitioners are selling mixtures of different whitening and brightening creams with the tag “herbal and organic” and other attractive titles, but these products are known to contain toxic chemicals, most prominent being mercury. Many dermatologists/ physicians and homeopaths are promoting the use of such products, with the consumers being unaware about the damage it can cause to the reproductive and nervous system. Not only skin whitening creams but every skin whitening product needs to be strictly monitored and regulated. She informed the audience that famous doctors and dermatologists are following wrong, unethical practices and promoting the concept of skin whitening and fairness by prescribing different whitening and brightening agents for skin care.

The pharmaceutical companies are one of the major selling agents of these products and put in heavy money on advertisements for promoting skincare products no matter what the negative effects of such products are. To stop and restrict this activity, the advertisement campaigns as well as health awareness programs should start explaining the harmful effects of using such creams, particularly focusing on the reproductive health of both males and females and the dangers for the next generation. Collaboration with social media influencers and celebrities can effectively play a huge role in advocacy campaigns, helping the public to transition away from such harmful skin lightening products.

Through Search Engine Optimization (SEO) the pharmaceutical companies invest huge amounts of money so that their products appear in quick searches more often. This can influence consumer behavior, and the same strategy can be utilized by companies manufacturing safer and healthier alternatives, directing the consumers towards consuming products that are safe to use. However, she concluded with the point that targeting societal mindset, although a time-taking process, is the key to eliminating this issue.

Special remarks and concluding remarks

Comments by Ms. Farzana Altaf (DG Pak- EPA) Guest of Honor

Ms. Farzana appreciated the efforts of SDPI and the panel organizers to highlight this important issue on this esteemed platform. She started off by first mentioning her experience of more than 28 years in the field of the environment and stressing that we have now entered a dangerous era where environmental degradation is at its peak and corrective efforts are only nominal. She appreciated the input of every panelist in the brainstorming session and particularly regarded the initiative of Dr. Razia Safdar in working for the wellbeing of the masses and putting forward this topic. She briefly mentioned the stakeholder meeting that SDPI conducted in October 2024 on the same topic, where Dr. Farzana had the privilege of providing special remarks, her key take away from that meeting being introduction of this matter to the parliament and ensuring strict legislation.



Regarding the assessment of toxic chemicals in cosmetics, she proudly mentioned the commendable efforts of the late colleague Dr. Mahmood A. Khawaja (Senior Advisor, Chemicals and Sustainable Industrial Development, SDPI) who was a pioneer in putting forward this serious issue through investigative studies and impactful seminars. Coming to the main topic, she emphasized on compliance of Minamata Convention in Pakistan, especially because it is now a party of Minamata Convention. However, she expressed great concern on the lack of efforts that are being carried out by the regulatory authorities in generally protecting the environment and human health. The example of chloride poisoning was quoted in a town near Lahore, that led to bone deformity in children, yet no action was being taken against it.

The main point that she highlighted was our society's obsession with fairness and how aggressively such beauty campaigns are promoted through social media. Promotion of skin whitening products is further increased by using celebrities as brand ambassadors. It is to be noted that not only mercury containing treatments but other costly alternatives such as glutathione injections are also being promoted through every platform possible, not informing the desperate consumers about the possible repercussions. The changing dynamics of the field of aesthetics and dermatology were also highlighted where only a few, trained professionals seem to care about the health of their patients while others are involved in following unsafe, unethical practices; sometimes not even being academically qualified themselves to perform such treatments.

She went on by stating some of the negative health impacts of such chemicals, especially on the reproductive system of young females and the nervous system. Pregnant women are especially at risk of harming the neurological and cognitive development of their children, especially because a toxic chemical like mercury can persist in the body for 50 years.

Awareness about the adverse effects of mercury added skin creams, makeup products and other colored cosmetics is still lacking not only at the national level but not even via social media platforms, particularly being dominated by the exhaustive fairness advertisements. She elaborated that there are a lot of unnamed and unbranded chemicals which are very harmful but are easily available in the market and used as ingredients in various products.

This is especially true in the case of undocumented manufacturing units that are producing substandard cosmetics in an unhygienic environment.

Dr. Farzana requested SDPI and the other prominent members of the discussion to work towards creation of a public forum, particularly focused on the public awareness of the detrimental health effects of such hazardous chemicals, especially on pregnant women and newborn babies. She suggested that more representation of this topic at educational seminars and periodic regular international/national forums is needed to discuss progress reports in this field.

A correlation was made with a survey that was conducted 20 years ago, focusing on mercury and lead poisoning among children and their impacts on the nervous system. It was then when the issue of lead petrol was raised, which later was successfully phased out. In summary, she implored the adoption of scientific evidence-based policy making in the country. Moreover, there is a need of effective coordination among multiple integral stakeholders in this regard, the health practitioners, regulatory authorities, researchers and academia. They need to come with effective guidelines, procedures, SOPs, and technical advice, each pertinent to their field, to better aid the Ministry in legal action and notification. Talking more about the enforcement and regulation, she mentioned the help of PSQCA in market surveillance, substandard product confiscation and efficient chemical testing prior to certification. Parliamentary response and government intervention is also integral to raise this issue at the national level.

She mentioned the Hazardous Chemical Waste Management Policy 2022 of M/o CC⁹, approved by the Cabinet but requiring much work regarding collective action on it; this includes legislation and restriction of hazardous chemicals sales, purchase and their use at provincial level, and also working towards regulation of products with an iota of carcinogenic chemicals, even if it is below the permissible standard limits. Not restricting this harmful chemical at the right time would lead to long term disastrous effects in the coming generations and would put innocent lives at stake.

Concluding remarks by Dr. Shazia Sobia Aslam Sumroo; Chief Guest

(Parliamentarian Member National Assembly Pakistan , Former Parliamentary Secretary MoNHSR&C)

She thanked and appreciated the organizers and SDPI for highlighting this important issue and especially involving the legislative authorities. She said that there is a gap between policy making and policy implementation in the country. The issue of defending the people involved in unjust practices, especially when it comes to your close family and relatives, is particularly common in Pakistan, be it any domain or sector. There should be strict rules and regulations for everyone in the country's system, giving more value to national interest instead of personal interest.



Fair skin is a social stigma which should be eliminated and for which awareness at all levels starting from the community and rural areas to all other sectors is of high importance. Along with awareness, highlighting the side effects of using SLPs also has its due importance. Through consultative process by all the stakeholders, legislation should come into form for mass awareness. Youth engagement and social media influencers are essential pillars that can be used to control the demand side of SWCs by raising awareness about the use of the SLPs and its harmful effects, she added. She further suggested that there should be evidence-based data and research on the rate of utilization of SWCs in different areas of Pakistan and the adverse effects of these products. She suggested that, the manufacturers' mafia needs to be targeted and reprimanded to involve them in the chain of production and sale of the products. There should be inspections of beauty salons and aesthetic clinics to seize the mercury containing products that are being used on clients for beautification purposes.

She concluded by committing that she will surely highlight this important issue at different high-level platforms in government setup and the standing committees of health and climate change.

Meeting Outcomes

Following are the policy recommendations fetched from the panel discussion:

Monitoring

- Engage stakeholders and quality infrastructure authorities to inspect the substandard manufacturing units for quality control and industrial practice
- Accredited laboratories need to be established at Pakistan regional level with advanced equipment and laboratory for mercury testing protocol.
- A digitalized system needs to be established at Pakistan regional level, where alert systems need to be generated for sharing of information regarding non-compliant products to the relevant authorities and strict action taken in response.
- Investigative skin studies need to be thoroughly conducted, particularly focusing on the role of social media campaigns and such qualitative research with to be published in journals

Advocacy & Awareness

- Consumer awareness about the health hazards of mercury will aid in the reduced demand for such products.
- We need to change the mindset surrounding dark skin treated as a social stigma by engaging civil society, public, dermatologists, policymakers and psychologists in awareness campaigns promoting 'healthy skin' and not fair skin.
- Information material such as pamphlets and awareness notes should be circulated during OPDs in different languages for the public, containing information about the harmful impacts of mercury containing skin whitening creams.
- Men are also involved in using skin whitening creams and should be equally targeted through inclusion in the awareness campaigns as well.
- There needs to be promotion of self- acceptance, body positivity and embracing natural skin color through widespread public campaigns
- Introduce a narrative into these campaigns where strictly highlighting the negative health impacts should be particularly focused on in these campaigns

Capacity Building

- Prescribers, medical practitioners and cosmetic manufacturers need to be educated on the concentration of mercury content in such products.
- Training sessions for front liners such as manufacturers and awareness campaigns for field officers need to be held regularly for maximum advocacy.
- Amended permanent standards and penalties need to be set in place for the plethora of other toxic cosmetics that are available in the market.
- An independent survey needs to be conducted to observe the circulation and availability of non-compliant SWCs in the market.

Governance

- Parliamentary response and Government intervention is integral in order to raise this issue at the national level.
- Multi-stakeholder engagement and roles and responsibilities of each sector should be highlighted to address the seriousness of the situation at formal discussions.
- This issue needs to be brought to the attention of the public by starting campaigns at the grass root level and targeting rural districts
- The manufacturers' mafia needs to be targeted and reprimanded to involve them in the chain of production and sale of the products.
- There should be inspections of beauty salons and aesthetic clinics to seize the mercury containing products that are being used on clients for beautification purposes.

Annexure: I

List of Panelists

Sr. No.	Panelists	Designation	Organization	Email Address	Phone No.
1.	Dr. Zaigham Abbas Chair	Director Lab/NEQS	Pakistan Environmental Protection Agency (Pak-EPA)	mzaigham75@yahoo.com	051-9250718
2.	Brig. Dr. Naeem Raza	President	Pakistan Association of Dermatology	naeemraza561@hotmail.com	+923232914405
3.	Mr. Khawaja Ghulam Mohiuddin	Deputy Director Chemical	Pakistan Standards & Quality Control Authority	khawja77@ymail.com	021-99261629
4.	Prof. Dr. Nadia Ali Azfar	HOD Dermatology Unit 2	Allama Iqbal Medical College/ Jinnah Hospital, Lahore	nadiaazfar@live.com	+923004580871
5.	Dr. Iqra Sharafat	Assistant Director Technical	Pakistan Standards & Quality Control Authority	sharafatiqra@yahoo.com	0519265021
6.	Dr. Sadia Tabassum	Program Director & Section Head Dermatology, Vice President PAD, Sindh, Member of Dermatology Faculty CPSP	The Aga Khan University, Karachi	saadia.tabassum@aku.edu	923009206349
7.	Dr. Tahira Shahid	Aesthetic Physician/ Health Activist	Private practitioner	drtahirac11@gmail.com	+923457664767
Chief Guest					
8.	Dr. Shazia Sobia Aslam Somroo	Member of Pakistan National Assembly		Shazia.rsw@na.gov.pk	03454999505
Guest of Honour					
9.	Ms. Farzana Altaf	DG Environment	Pakistan Environmental Protection Agency (Pak-EPA)	dg@environment.gov.pk	051-9250713

Annexure: II

Profiles of panelists

CHIEF GUEST

Dr. Shazia Sobia Sumroo is a prominent MNA who also previously served as the member of National Assembly of Pakistan in 2 tenures (2015-18) and (2018-23). She is also former parliamentary Secretary for Ministry of National Health Services, Regulation and Coordination.

GUEST OF HONOR

Ms. Farzana Altaf Shah serves as the Director General of the Environment Protection Agency (EPA). She has been instrumental in enforcing the Pakistan Environmental Protection Act 1997 rules and regulations. Her department plays a crucial role in issuing certificates for the establishment of environmental laboratories in Islamabad and working towards pollution prevention, environmental protection, and sustainable development.

CHAIR

Dr. Zaigham Abbas is working as Director (Lab/NEQS) in Pakistan Environmental Protection Agency since November 2023. Currently, he is the co-chair of Plastic Waste Partnership from Asia Pacific Region of Basel Convention and Bureau Member of Chemical Review Committee of Rotterdam Convention. He was also involved in Ratification of Minamata Convention in 2020 and is one of the experts involved in development of 'Guidance on Mercury Releases.'

PANELISTS

- Pakistan Standards and Quality Control Authority:

1. **Mr. Khawaja Ghulam Moiuddin** is the Director Standards at PSQCA
2. **Dr. Iqra Sharafat** is the Assistant Director Technical at PSQCA

- Pakistan Association of Dermatologists:

1. **Brig. Dr. Naeem Raza** is currently the President of the representative platform Pakistan Association of Dermatologists, Karachi. He is responsible for overlooking aspects of professional development, research promotion, networking, public awareness, advocacy and standardization of care in the field of dermatology.
2. **Prof. Dr. Nadia Ali Azfar** is the head of the Dermatology Department Unit II at Allama Iqbal Medical College, Lahore. Her areas of interest include clinical dermatology and recent innovations in management of dermatological disorders. She has served as International Secretary for PAD and is now a Joint Secretary for it. She has been a speaker at various national and international forums and is also a co-author of a book on "Management Guidelines of Skin Diseases."

3. Dr. Saadia Tabassum (MBBS, FCPS (Dermatology)) is the Program Director & Section Head of Dermatology at AKUH. She is also the Vice President of PAD, Sindh and Member Dermatology Faculty College of Physicians and Surgeons Pakistan (CPSP), Karachi.

- Dermatologists/Aesthetic Physician:

1. Dr. Tahira Shahid is an Aesthetic Physician with her own private clinic known as Kaya Wellness Retreat in Bahria Town, Islamabad. Apart from this, she is also a philanthropist, corporate trainer, television personality and a health activist, hosting many renowned TV shows on health awareness.

Annexure III

List of attendees

S.#	Name	Designation	Organization	Contact No.	Email
1.	Ms. Zartasha	Nutritionist	Riphah International University	0331-4618575	zartasha575.fst@gmail.com
2.	Dr. Talat Sharif	Radiologist	Self	0335-3077701	tsmd10@yahoo.com
3.	Dr. Sofia Khalid	Chairperson Environmental Sciences Dept.	Allama Iqbal Open University	0334-5333714	sofia.khalid@aioou.edu
4.	Mr. M. Umar Butt	Student	Self	0315-2312486	mumarbutt486@gmail.com
5.	Ms. Arwa Raza	Research Associate	GGC	0322-9231839	arwaraza852@gmail.com
6.	Ms. Isra Asif	Researcher	NIPS	0336-5147716	
7.	Mr. Abdullah Munawwar	Associate Fellow	NIPS	0316-1701172	abdullahmunawwar60@gmail.com
8.	Mr. M. Ishaq	Associate Fellow	NIPS	0341-9060450	Ishaqkakar66@gmail.com
9.	Mr. Haroon Ali	Associate Fellow	NIPS	0336-1412718	
10.	Mr. Sajid Amin	Deputy Executive Director	SDPI		
11.	Dr. Javaria	DGT Obs & Gynae	Rawal Hospital CPSP	0331-5699355	Javariajahangir786@gmail.com
12.	Dr. Hina Jawaaid	Associate Professor & HOD Family Medicine	Health Services Academy Islamabad	0308-4918434	hinajawaaid246@gmail.com
14.	Mr. Kumail Ali			0332-1512969	kumaidi@gmail.com
15.	Ms. Laiba Khan	Graduate	COMSATS University, Islamabad	0332-1512969	laibakhan9070@gmail.com
16.	Mr. M. Moeen	MIS Specialist	BRRA NDMA	0334-4687321	moeen.raza@gmail.com
17.	Mr. M. Haris	APS	Pak-EPA	0333-3255226	haris1885@gmail.com
18.	Brigadier Tariq Saeed	Cargill Pakistan	On line		
19.	Four Representatives	Department of Environmental Sciences	Quaid Azam University		

Annexure: IV

Agenda of the Panel Discussion








27th Sustainable Development Conference (4th -7th Nov, 2024)

‘Minamata Convention Compliance in Pakistan – Role of Dermatologists and Regulatory Authorities’

Panel Discussion (Hybrid)

Agenda

Date: 7th November 2024

Timings: 10 -11:30 AM

Venue: Pak-China Friendship Center, Hall 206

Time	Panelists	Responsibility
1000-1010	Dr. Razia Safdar	Opening Remarks and Introduction
1010-1020	Mrs. Farzana Altaf Director General Environmental Protection Agency, Pakistan	Special Remarks
	Panelists	Topic of Discussion
1020-1110	Dr. Zaigham Abbas (Chair) Director Lab/NEQS -Pak EPA	Compliance to Minamata Convention and MIA report and role of MOCC&EC, recommendations and way forward.
	Mr. Toufeeq Ali Abbasi Director General PSQCA	"Pakistan Standard on Skin creams 2017"- status of implementation and scope with reference to SWCs and Minamata Convention.
	Dr. Shabana Saleem DG Health (M/o NHR&C)/ Dr. Uzma Sarmad/ Dr. Sofia	How the M/o National Health can deal with this public health issue by impact of mercury in skin whitening creams and how they can implement the commitments of Minamata Convention.
	Brig. Dr. Naeem Raza President, Pakistan Association of Dermatologists	An overview of role of Pakistan Association of Dermatologists in implementation of Minamata Convention. Academia on advocacy and safe behavior/ safe alternatives in cosmetics industry.
	Dr. Nadia Ali Azfar HoD Dermatology Dept. Allama Iqbal MC	Current level of public awareness and education for mercury content in skin whitening products.
	Dr. Tahira Shahid Aesthetic Physician and Influencer	Colorism and people of color, social norms of beauty and role of aesthetic industry
	Dr. Sadia Tabassum Program Director & Section Head Dermatology	Colorism and alternatives
Discussion		
1110-1115	Participants Facilitation team	Audience Q &A Session
1115-1120	Dr Razia Safdar	Wrap up/Recommendations
1120-1130	Dr. Shazia Sobia Soomro MNA and Former Parliamentary Secretary Health MoNHR & C	Concluding remarks by Chief Guest

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