

CENTRE FOR SCIENCE AND ENVIRONMENT

MAIN OFFICE: 41, Tughlakabad Institutional Area, New Delhi-110 062 INDIA

Tel: 2995 5124, 2995 6110, 2995 6394, 2995 6399 **Fax:** 91-11-2995 5879 **Email:** cse@cseindia.org **Website:** www.cseindia.org

BRANCH OFFICE: Core 6A, Fourth Floor, India Habitat Centre, Lodhi Road, New Delhi-110 003

Tel: 2464 5334, 2464 5335



June 4, 2013

Ms. Punita Kalra
Chief Executive Officer
R & D and innovation
Emami Limited
Emami Tower, 687, Anandapur
EM Bypass
Kolkata - 700107

LEAVES
OF
IMPORTANT
SURVIVAL
TREES
IN
INDIA --
MAHUA,
KHEJRI,
ALDER,
PALMYRA
AND
OAK

Subject: Presence of Heavy Metals in Cosmetic Products of Emami Limited

Dear Ms. Kalra,

Centre for Science and Environment (CSE) has been working on toxins and their health impacts since early 1990s. CSE's Pollution Monitoring Laboratory (PML) has taken proactive position by consistently researching on this issue and informing public, regulators and industry about it.

PML recently tested various cosmetic products available in Indian market for presence of heavy metals. We tested several brands of lipstick, lip-balm, anti-ageing cream, fairness cream for heavy metals such as mercury, lead, cadmium, chromium and nickel.

Our results show presence of mercury in the products of Emami Limited as follows:

- Emami Cold Cream contained 0.22 ppm of mercury.

The presence of mercury in fairness creams is a serious public health issue, as these are used by a large number of people across the country. Most of the users are unaware of the presence of heavy metals in these products and the potential health hazards of their long term continuous exposure.

Mercury is a well-known neurotoxin. In both organic and inorganic form, it affects nervous system, gastrointestinal tract and the kidneys. These health hazards are not exhaustive. In the wake of our findings, we would like to know your response on the following:

- Why mercury is present in the product of Emami Limited? What is the rationale of allowing/adding it?
- Do you monitor the presence of mercury? What have you done so far to minimise its presence? What are the plans (if any) for phasing out mercury from your product?
- Are there any efforts/initiatives to make the consumer aware about the presence of mercury and its potential ill effects?
- If this brand is sold in other countries; is it exported from India or manufactured in the respective country? What is the level of mercury found in this brand sold in other countries?
- Do you make this on your own or outsource its manufacturing? Who is the manufacturer and from where it is imported if not manufactured in India?

CSE is committed towards restricting/limiting presence of heavy metals in cosmetics through regulatory process and consumer awareness. The industry needs to come forward and take steps to phase out such heavy metals from its products well before the consumer starts demanding it or stringent regulatory provisions enable the same.

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ANIL AGARWAL

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CSE

CSE is committed towards restricting/limiting presence of heavy metals in cosmetics through regulatory process and consumer awareness. The industry needs to come forward and take steps to phase out such heavy metals from their products well before the consumer starts demanding it or stringent regulatory provisions enable the same.

We do hope that you will agree to our concerns and take steps to address it. We look forward to your detailed response and appreciate if it reaches to us within a month.

With my very best wishes.

Yours cordially,



Chandra Bhushan
Deputy Director General



11th June, 2013

Mr. Chandra Bhushan
Deputy Director General
Centre for Science and Environment
41, Tughlakabad Institutional Area
New Delhi – 110062

Dear Mr. Chandra Bhushan,

Sub: Presence of Heavy metals in cosmetic products of Emami Limited

We acknowledge the receipt of your letter dated 4th June, 2013.

Emami Limited is the flagship company of the famous Emami Group. We are a coveted Rs. 1700 crore business entity, a leading player in the personal and healthcare consumer products industry in India and a household name amongst the public in general. Our products are manufactured by following the stringent requirements as laid down under Drugs & Cosmetics Act, 1940. We have won many prestigious awards in respect of our quality products.

In the background of above adherence to quality control, we can assure that our products are of standard quality and that they do not contain any heavy metal harmful to human skin.

However, we appreciate your concern in the matter and would provide whatever help is required from our end in this matter.

We do not manufacture any product by the name of Emami Cold Cream. Hence, to respond to your letter, we would request you to please provide us the following information:

- 1) Full name of the product of our Company as referred by you in your letter.
- 2) The Batch no., Mfg date, Expiry date of the product along with manufacturing address.



emami* limited

- 3) The method of analysis as followed by you for determining the presence of mercury.
- 4) The copy of test report evidencing the presence of mercury in the product.

The above information is required for testing the control sample of the batch at our end.

Thanking you,

Sincerely yours,
For Emami Limited

Neeraj Gandhi

Neeraj Gandhi
Senior Manager - Legal

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Tel: 2464 5334, 2464 5335



June 26, 2013

Mr. Neeraj Gandhi
 Senior Manager – Legal
 Emami Limited
 687, Anandapur
 EM Bypass
 Kolkata - 700107

LEAVES
 OF
 IMPORTANT
 SURVIVAL
 TREES
 IN
 INDIA —
 MAHUA,
 KHEJDI,
 ALDER,
 PALMYRA
 AND
 OAK

Subject: Presence of Heavy Metals in Cosmetic Products of Emami Limited

Dear Mr. Gandhi,

Thank you very much for your letter dated June 11, 2013 addressed to Mr. Chandra Bhushan (DDG, CSE).

We appreciate your prompt support in addressing this public health issue. With respect to your queries, you may please take a note of below mentioned information related to the product and method used to test presence of mercury in cold cream of Emami Limited.

1. Full name: Emami Malai-Kesar Cold Cream
2. Batch number: AU 043, Mfg date: Sep – 2011, expiry date: 24 months, manufacturing address: Emami Limited, College Nagar, Abhoypur, North Guwahati, Assam – 781031
3. Method of analysis: Flameless atomic absorption spectrometry
4. Copy of the test report: Our report is not in public domain as of now and we will not be able to share it due to confidential information on other brands that have been tested for mercury. However, we understand that the following details will solve the purpose stated in your letter:
 - Sample preparation: Application note provided by Clark et. al. of CETAC Technologies, USA was used for the sample preparation for mercury estimation¹. The samples were weighed (~0.2g) into the beaker. The samples were predigested with 2 mL of H₂SO₄ and 2 mL HNO₃ for 1.5 hours at 80° C. This initial predigest step dissolved/dispersed the samples and then allowed to cool to room temperature. Then 7.0 mL of KMnO₄ and 5 mL 3% HCl were added to each beaker and then heated at 95° C for 2 hours. After again cooling to room temperature, 3.0 mL of the hydroxylamine solution was added to reduce the KMnO₄. The beakers were swirled to assure complete reaction with the excess KMnO₄. They were then brought up to a final volume of 25 mL with 3% HCl with thorough mixing prior to instrument analysis of the samples.

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 VIRENDRA KUMAR
 WILLIAM BISSELL

¹ David H. Clarke, Jeffrey A. Forsberg, and John L. McQuatters; Mercury Determination in Cosmetics, Using the CETAC QuickTrace™ M-7500 CVAAS; CETAC Technologies, Omaha, NE



- **Sample analysis:** Digested samples were analyzed for Mercury using flameless atomic absorption spectrometry. Standard solutions were prepared in five different concentrations to obtain calibration curve for quantitative analysis. All the measurements were run in triplicate for the samples and standard solutions. Deuterium lamp was used for background correction.

Recovery was found to be more than 90%.

We hope that the information provided above is useful in addressing this issue of huge concern.

We look forward to your detailed response at the earliest.

Thank you very much.

With best wishes,

Amit Khurana
Programme Manager
Food Safety and Toxins Programme



19th August, 2013

Mr. Amit Khurana
 Programme Manager
 Food Safety and Toxins Programme
 Centre for Science And Environment
 41, Tughlakabad Institutional Area
 New Delhi – 110 062

Dear Mr. Amit Khurana,

Sub: Presence of Heavy Metals in Cosmetic Products of Emami Limited

We are in receipt of your letter dated 26th June, 2013.

With reference to the above letter, we would at the outset like to bring to your notice that **we do not add any Mercury or Mercuric compound in any of our products.**

As per your letter dated 4th June, 2013, you had mentioned that our product Emami Malai Kesar Cold Cream shows the presence of mercury in it at **0.22 ppm level.**

We had analysed two batches of Emami Malai Kesar Cold Cream (BN: BA 097 / Code: EM/MK/01 & PP052/2013 / Code EM/MK/02) in NABL approved external laboratory – M/s Shiva Analyticals (India) Ltd., Bangalore wherein the results show that the Mercury Level in the product is **Below Detection Limit (less than 0.1 ppm)** and the findings of such report is attached with this letter for your reference and marked as **"Annexure – A"**. **This amounts to absence of mercury in our products referred here in.** Our Inhouse laboratory report was also to this effect and the same has been confirmed by this independent report.

We believe and hope that the above explanation will assure you that there is absence of **mercury in our product.**

Thanking you.

For Emami Limited

Neeraj Gandhi
 A.G.M. - Legal



**ANALYTICAL SOLUTIONS
WORLDWIDE**

SHIVA ANALYTICALS (INDIA) LIMITED

Plot No. 24D(P) & 34D, KIADB Industrial Area,
Bangalore, Hoskote - 562 114. India

Tel : +91-80 2801 5333 / 2797 1322/1626/1431

Fax : +91-80-2797 1321

Email : info@shivaanalyticals.com

Website : www.shivaanalyticals.com

**TEST CERTIFICATE
SAIL No.00813065065**

Issued To : Emami Limited
13, B.T.Road,
Kolkata - 700 056,
West Bengal, India
Ph: 033-66223263

Ref No.: P.O.No.: 6500119993

Date: 14 Jun 2013

CA No.: 00813065065

Date of Receipt: 17 Jun 2013

Date of Starting: 17 Jun 2013

Date of Completion: 02 Jul 2013

Date of Report: 02 Jul 2013

Matrix : Cream
Customer ID : Em/mk/01

Page 1 of 1

SI.No.	Tests	Unit	Results	Protocol
1	General			
1.1	Arsenic	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.2	Antimony	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.3	Copper	ppm	BDL	AOAC,18TH EDITION/ICP - OES
1.4	Lead	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.5	Iron	ppm	BDL	AOAC,18TH EDITION/ICP - OES
1.6	Mercury	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.7	Cadmium	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.8	Nickel	ppm	BDL	AOAC,18TH EDITION/ICP - MS

Note : BDL : Below detection limit
ICP - MS Detection limit : 0.1ppm
ICP - OES Detection limit : 1.0ppm

End of Report

Authorized Signatory

.....
Lab Incharge
Cosmetics

- Note:
- The results listed above pertain only to the tested samples and applicable parameters.
 - Samples which are degradable will be disposed immediately after testing and others will be disposed after one month from the date of issue of test certificate unless otherwise specified.
 - Total liability of our laboratory is limited to the invoice amount.
 - This report is not to be reproduced either wholly or in part and cannot be used as an evidence in the Court of Law and should not be used in any advertising media without prior written permission.
 - In case any reconfirmation of contents of this test certificate is required, please contact our office.
 - Sampling is not done by us unless otherwise specified.
 - Any discrepancy in the Test Certificate should be notified within 30 days.

Accreditations: NABL
Certifications: ISO 9001-2008
Approvals: KSPCB, BIS

SAIL/FRM-01R



**ANALYTICAL SOLUTIONS
WORLDWIDE**

SHIVA ANALYTICALS (INDIA) LIMITED

Plot No. 24D(P) & 34D, KIADB Industrial Area,
Bangalore, Hoskote - 562 114, India
Tel : +91-80 2801 5333 / 2797 1322/1626/1431
Fax : + 91-80-2797 1321
Email : info@shivaanalytics.com
Website : www.shivaanalytics.com

**TEST CERTIFICATE
SAIL No.00813065066**

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CA No.: 00813065066
Date of Receipt: 17 Jun 2013
Date of Starting: 17 Jun 2013
Date of Completion: 02 Jul 2013
Date of Report: 02 Jul 2013

Matrix : Cream
Customer ID : Em/mk/02

Page 1 of 1

SI.No.	Tests	Unit	Results	Protocol
1	General			
1.1	Arsenic	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.2	Antimony	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.3	Copper	ppm	BDL	AOAC,18TH EDITION/ICP - OES
1.4	Lead	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.5	Iron	ppm	3.0	AOAC,18TH EDITION/ICP - OES
1.6	Mercury	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.7	Cadmium	ppm	BDL	AOAC,18TH EDITION/ICP - MS
1.8	Nickel	ppm	BDL	AOAC,18TH EDITION/ICP - MS

Note : BDL: Below detection limit
ICP - MS Detection limit : 0.1ppm
ICP - OES Detection limit : 1.0ppm

End of Report

Authorized Signatory

.....
Lab Incharge
Cosmetics

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Certifications: ISO 9001-2008
Approvals: KSPCB,BIS

SAIL/FRM-01R

Analysis Done by : Shiva Analyticals (India)Ltd, Bangalore.

S.No	Name of the sample	Batch no.	Mfg. date	Production Unit / Area of procurement	As,ppm (ICP MS)	Cd,ppm (ICP MS)	Sb,ppm (ICP MS)	Hg,ppm (ICP MS)	Pb,ppm (ICP MS)	Ni,ppm (ICP-MS)	Cu,ppm (ICP-OES)	Fe,ppm (ICP-OES)	Protocol
Skin care													
1	Emami Malai Kesar Cold cream	B.N.-BA097 (Code-EM/MK/01)	Jun-13	Market Sample	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	AOAC; ICP-MS / AOAC; ICP-OES
2	Emami Malai Kesar Cold cream	B.N.-PP052/2013 (Code-EM/MK/02)	Jun-13	Market Sample	BDL	BDL	BDL	BDL	BDL	BDL	BDL	3	AOAC; ICP-OES

BDL = Less thn 0.1 ppm

