

CENTRE FOR SCIENCE AND ENVIRONMENT

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June 4, 2013

Mr. Sandeep Kaul
 Chief Executive
 Personal Care Products
 ITC Limited,
 37, J. L. Nehru Road,
 Kolkata - 700071

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

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

Dear Mr. Kaul,

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 fairness cream of ITC Limited India as follows:

- Vivel contained 0.23 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 ITC 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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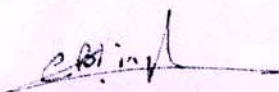
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We do hope that you will agree to our concerns and take steps to address it. We look forward to your detailed response and appreciate if it reaches to us within a month.

With my very best wishes.

Yours cordially,



Chandra Bhushan
Deputy Director General



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July 3, 2013

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

Dear Sir,

We refer to your letter dated June 4, 2013 addressed to Mr. Sandeep Kaul.

In your letter you have stated that Pollution Monitoring Laboratory of Centre for Science and Environment tested various cosmetics products and the said tests show fairness cream of ITC contained 0.23 ppm of mercury. You have asked us to clarify the rationale in adding mercury in our product and the steps taken by us to reduce it.

We would like to state that we do not use mercury and its compounds in the manufacture of our Vivel Active Fair fairness creams. Since we do not add mercury and its compounds in our fairness cream the question of taking steps to reduce it does not arise. As an organisation we are committed to high standards of product safety, and ensuring the strictest standards through rigorous testing of our finished products on the basis of accepted testing protocols. We also have stringent raw material specifications and quality clearance procedures for each ingredient that are used in the manufacture of finished products such as fairness creams. Our products are fully compliant with Bureau of Indian Standards ("the BIS") specifications. Our final product is tested for heavy metals as per the protocol prescribed under the BIS and found to be fully compliant.

We are not aware of the test protocol followed by you and we do not agree that 0.23 ppm of mercury was found in Vivel Active Fair fairness cream. It would be relevant to note that authorities across the world have recognised the non-intended presence of certain substances in trace quantities in cosmetic products, even though those substances had not been added and which is also technically unavoidable in good manufacturing practice. In many jurisdictions, a permissible limit has been prescribed for such substances including mercury. While Canada has prescribed the permissible limit of 3 ppm for mercury in U.S.A it is 1 ppm.

We reiterate that our product is compliant with the specifications in BIS for all parameters including those related to heavy metals, and our product is safe in all respects for use.

Thanking you

Yours sincerely,

For ITC Limited

A handwritten signature in black ink, appearing to read 'Venkat Krishnan'.

(Dr Venkat Krishnan)

Chief Scientist- Product Development