

SAICM/UCT Lead in Paint (LiP) Community of Practice (CoP)

Discussion Forum Guidance

Title	Setting low limits for lead in paint
Date	18th August 2020
Time	16:00pm – 17:30pm (GMT +2)
Facilitator	Prof. Andrea Rother, Univ of Cape Town, South Africa
Presenters	Ms Desiree Narvaez, UNEP Mr Steve Wolfson, US EPA Ms Amanda Rawls, ABA-ROLI
Chair	Ms Maxine Brassell, MPH Student, UCT, South Africa

Format of how the discussion will operate:

- To participate in this discussion, sign up at:
<https://chemicalswithoutconcern.org/community>
- Should you require assistance or have questions, contact: uctcops@outlook.com
- This live discussion will be run in Microsoft Teams in the chat section on the set day. You will receive instructions prior to the discussion
- The discussion will take place in the chat section of MS Teams. Members will introduce themselves upon arrival into the chat room.
- The discussion presenter may briefly present a verbal introduction with the assumption that members have read the text below. In some cases, presenters will provide a voiced over PowerPoint introduction before the discussion.
- Three questions will be posted during the 1 ½ hour discussion with each receiving 30 minutes. The presenter/s will address questions and statements posted by members but the intention is that others will respond as well.
- All are welcome to join the discussion which will be held in English. Feel free to write in another language if you are struggling with English and members will assist where possible.

Instructions for joining this discussion on the set date:

This discussion will be held in **Microsoft (MS) Teams**.

- After joining the CoP, a link to this discussion will be circulated to you via email and sent out as an Outlook calendar invite.
- If your organisation already has MS Teams, you will need to switch from your organisations MS Teams to your University of Cape Town Guest Teams account in the following manner:
 - a. You can do this by going into your MS Teams and navigating to the top right corner of the page to where your profile picture is
 - b. Here you should see the name of your organisation and small arrow indicating a drop-down menu
 - c. Click on this arrow and choose “University of Cape Town”
- Find the email sent to you with the MS Teams link to this discussion.
- Click the link that says, “Join Microsoft Teams Meeting” and you should be taken into the discussion.

If you have not received an email with the link, make sure you are signed up for the Lead in Paint Community of Practice or send an email to: uctcops@outlook.com

PRESENTER BIOSKETCHES

Desiree M. Narvaez, Programme Officer, United Nations Environment Programme (UNEP), Chemicals and Health Branch



Desiree M. Narvaez coordinates the lead paint component of the SAICM GEF project and is the focal person on “lead” in UNEP where she has been working for 14.5. She has a Medical Degree and a Masters in Public Health Degree from the University of the Philippines, and a Certificate of Chronic Disease Epidemiology at the Stanford University, USA. UNEP is co-secretariat with WHO in the Lead Paint Alliance.

Steve Wolfson, US EPA



Steve Wolfson coordinates international capacity-building activities on environmental law at the U.S. Environmental Protection Agency Office of General Counsel’s International Environmental Law Group, providing environmental law and enforcement training of environmental lawyers in Africa, Asia, and Latin America. A graduate of Brown University and UCLA School of Law, Steve has taught international and comparative environmental law courses at George Washington University School of Law, Howard Law School and at the Vermont Law School summer program, and has published widely on environmental governance and on Chinese environmental law.

Amanda Rawls, ABA-ROLI



Amanda Rawls is a lawyer and development professional currently based in Amman, Jordan. She has over 15 years of experience in Access to Justice, Rule of Law, and Legal System Strengthening. She has worked mainly in sub-Saharan Africa.

DISCUSSION INTRODUCTION (16:00pm GMT+2) – Desiree Narvaez

Legally binding limits on the lead content in paint are necessary to prohibit the addition of lead to paint and to move toward complete elimination of lead paint. Why and how to establish low lead paint limits is an important topic for discussion within the lead paint community. The UNEP Model Law and Guidance for Regulating Lead Paint provides a 90ppm limit, which is the lowest legal limit that has been established to date.

In today's discussion, we will consider why a mandatory lead paint limit is needed, what challenges countries may face, and how to create a strong legal limit.

The following questions will be addressed:

- 1) What actions has your country taken to transition to a specific mandatory legal limit on lead in paint and what is the limit?
- 2) Though the Lead Paint Alliance recommends a 90ppm limit for all paints, in some countries, stakeholders may have concerns about the limit for specific types of paint. Have any of these concerns been raised in your country, and how are you working to address them?
- 3) What compliance or enforcement provisions do you think assist with making a 90ppm limit effective? For example, currently in your country, even without a lead paint law, what obligations do manufacturers or importers have to document the safety of their products and how effective is this system?

The **intention is that at the end of this discussion** participants:

- understand the importance of setting a low legal limit on lead paint,
- understand the concerns that may be raised,
- know what enforcement mechanisms are helpful to make the limit effective, and
- contribute to the SAICM discussion looking ahead.

QUESTION 1 (16:05pm - 30 mins) - Steve Wolfson

Background: A low mandatory limit for lead in paint provides the strongest protection for public health. Setting a specific legal limit on lead content helps the regulated community understand the rules and ensures that the law is more easily enforceable. This requires specifying a quantitative limit and a valid method to measure the quantity for lead in paint.

Question 1: What actions has your country taken to transition to a specific mandatory legal limit on lead in paint and what is the limit?

Resources

- **Model Law and Guidance for Regulating Lead Paint** (available in 6 languages)
<https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-paint>

QUESTION 2 (16:30pm - 30 mins) – Steve Wolfson

Background: To protect public health, and especially children, who are most vulnerable, the Lead Paint Alliance Model Law establishes a 90ppm limit for all paints. Some stakeholders have noted that for certain types of industrial paints or marine coatings it is more difficult to meet this limit. To help address this, the Model Law also allows for different phase-in dates that can provide a reasonable amount of time needed to source and procure alternative materials, to alter product formulations and processes.

Question 2: Though the Lead Paint Alliance Model Law establishes a 90ppm limit for all paints, in some countries, stakeholders may have concerns about this limit for specific types of paint. Have any of these concerns been raised in your country, and how are you working to address them?

Resources:

- **WHO Technical and Policy Brief: “Global elimination of lead paint: why and how countries should take action.”**

QUESTION 3 (17:00pm - 30 mins) – Amanda Rawls

Background: To be effective, a law establishing a legal limit must have strong provisions which allow for enforcement of the law. These provisions may include requirements on testing, inspection authority, and penalties for “prohibited acts.” Several different agencies in a country may need to coordinate to implement an effective law.

Question 3: What compliance or enforcement provisions do you think assist with making a 90ppm limit effective? For example, currently in your country, even without a lead paint law, what obligations do manufacturers or importers have to document the safety of their products and how effective is this system?

Resources:

- **Lead Paint Alliance Frequently Asked Questions** (FAQ) numbers 23 &27
<https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint-2>

BLOG Post Instructions for those who cannot attend the live discussion**Blog post instructions:**

Should you not be able to attend the discussion when it is scheduled to happen but still wish to contribute, post your answers/comments as a Wiki post in the MS Team channel for this discussion.

Instructions on how to post a Wiki post in MS Teams:

1. If your organisation already has MS Teams, you will need to switch from your organisations MS Teams to your University of Cape Town Guest Teams account.
 - a. You can do this by going into your MS Teams and navigating to the top right corner of the page to where your profile picture is. Click on the small arrow indicating a drop-down menu and choose “University of Cape Town”
2. Open up MS Teams and navigate to the Lead in Paint CoP Team.
3. When you are in LiP CoP Team, look for the channel corresponding to the date of the discussion you would like to blog for (i.e. '18.08.2020 – Discussion 2') and click on that channel.
4. At the top of the page, once you are in the channel, just under the search bar are a number of tabs, look for the tab called 'Blog posts'. Click on this tab
5. An example blog post will guide you on how to structure your blog post.
6. Beneath the example blog post (or the previous person's blog post, should someone else have written a blog post before you) look for the purple plus sign (+) that says 'Add a new section here'. Click the plus sign (+)
7. Title your section with your name and country or organization.
8. Below the title it should say 'Your content goes here', add your answers and contributions for the discussion there.
9. Your answers and contributions will be posted into the live discussion chat for others to comment on. You can return later to read the chat.