

Division of Environmental Health
School of Public Health and Family Medicine
Isikolo Sempilo Yoluntu kunye Namayeza Osapho
Departement Openbare Gesondheid en Huisartskunde

UNIVERSITY OF CAPE TOWN
ADVANCEMENT THROUGH LEARNING AND EXCELLENCE



COMMUNITY OF PRACTICE ON

LEAD IN PAINT

Organized by the SAICM Secretariat and the University of Cape Town

Lead in Paint (LiP) Community of Practice CoP 2020 DIGEST COMPILATION

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INTRODUCTION

In 2020, the Lead in Paint (LiP) CoP successfully hosted four online discussions. Collectively, these discussions saw participation from 162 members from various regions such as, Africa, Asia-Pacific Western European and Other Groups, Latin America and Caribbean and Eastern European. The members represented various sectors such as, academia, intergovernmental organisations, non-governmental organisations, governments and private sectors within LiP. From these discussions three summary digests were produced for information, using as a resource and sharing with your networks. This document is a compilation of the 2020 LiP CoP discussion digests.

ABOUT THE LIP COP

The exchanges and discussions under the LiP CoP took place on a virtual space and intended to support the work of the Global Alliance for the Elimination of Lead in Paint under the SAICM project, GEF 9771: Global Best Practices on Emerging Chemical Policy Issues under SAICM, funded by the Global Environment Facility (GEF).

The objective of the LiP CoP is to foster discussions that will identify key issues related to chemicals linked to lead in paint as well as to enable knowledge sharing, best practice, case studies and tacit knowledge amongst participants of this CoP. This CoP is established under the framework of the SAICM project, GEF 9771: Global Best Practices on Emerging Chemical Policy Issues under SAICM, funded by the Global Environment Facility (GEF). The CoPs intention is to provide a platform for multiple stakeholders to engage with each other on LiP, as well as contribute to the Beyond 2020 discussions and deliberations.

HOW TO JOIN THE LIP COP

In 2020 the discussions were held in Microsoft Teams, however, in 2021 the CoP discussions will take place on Cisco WebEx.

If you have not signed up already and would like to become a member of the CoP to:

- Participate in online discussions with representatives from all relevant sectors, and if you wish, have the possibility to lead on a relevant discussion.
- Have first-hand access to up-to-date information produced by SAICM and other stakeholders on the SAICM emerging policy issues and other issues of concern.
- Actively contribute to peer-to-peer learning exchanges on best practices, case studies and experiences on chemicals management.
- Contribute to the development of new initiatives towards SAICM objectives and the SDGs.
- Receive summaries of discussions held.

Sign-up on the SAICM Knowledge website here, <https://saicmknowledge.org/community>



SAICM/UCT LIP COP 2020 DISCUSSION FORUM SCHEDULE

No	Date	Topic	Presenter	Facilitator
1	9 th July	Steps towards adoption of national lead paint laws	Angela Bandemehr, US EPA	Andrea Rother
2	11 th August	Setting low limits for lead in paint	Desiree Narvaez, UNEP Steve Wolfson, US EPA Amanda Rawls, ABA ROLI	Andrea Rother
3	23 rd September	Awareness raising materials for lead in paint elimination	Elena Jordan, WHO Evonne Marzouk, US EPA Sara Brosche, IPEN	Andrea Rother
4	10 th November	Compliance and enforcement mechanisms in a lead paint law	Evelyn Rivera-Ocasio, US EPA Negin Mostaghim, US EPA Amanda Rawls, ABA ROLI	Andrea Rother

The information in this digest represents the opinions of members participating from different stakeholder groups expressed during the discussion. The views expressed in this document do not necessarily represent the opinion or the stated policy of the United Nations Environment Programme, the SAICM Secretariat, the GEF or UCT, nor does citing of trade names or commercial processes constitute endorsement.



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 YUNIBESITHI YAKAPATA - UNIVERSITEIT VAN KAAPSTAD



COMMUNITY OF PRACTICE ON LEAD IN PAINT

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 1 of 2020
 Discussion date: 9th July 2020

Discussion digest 1

Topic of Discussion: Steps toward adoption of national lead paint laws

The first LiP CoP discussion, presented by Angela Bandemehr from the US EPA, reviewed three questions focusing on the development and adoption of lead paint laws that are critical to the successful elimination of lead paint in a country. The **Global Alliance to Eliminate Lead Paint** or **Lead Paint Alliance** (see: <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint>) outlines a series of steps towards laws which have been helpful in countries that have adopted laws in the **Steps Towards Laws Fact Sheet** (see Resources below). Since each country may experience unique challenges when it comes to developing and adopting lead paint laws, it was important to consider these during the discussion. Participants were encouraged to consider how countries can engage with stakeholders, address the technical and regulatory mechanism of drafting a law, and raise public awareness. To view the PowerPoint presentation of the discussion, click [here](#).

ABOUT THE PRESENTER



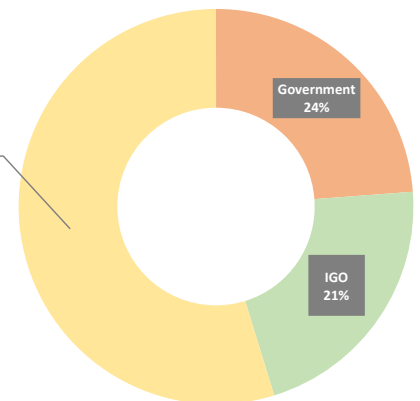
Angela Bandemehr is a senior international environmental program manager in Office of Global Affairs and Policy of the Office of International and Tribal Affairs at the U.S. Environmental Protection Agency, where she

has been working for 20 years on establishing and implementing effective international partnerships and projects to address global environmental issues. US EPA is the Chair of the Global Alliance to Eliminate Lead Paint.

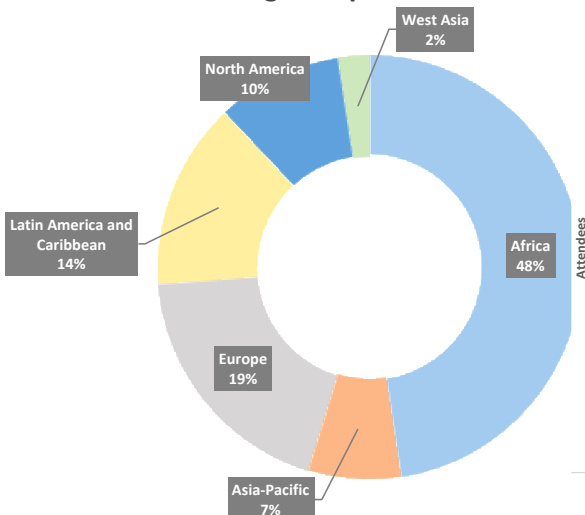
DISCUSSION 1 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION 1: 42

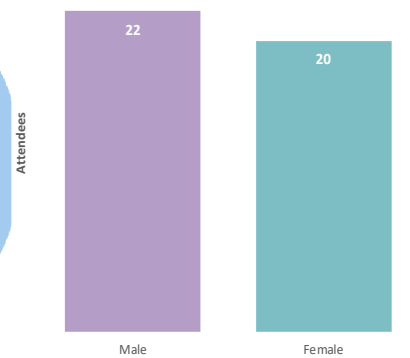
Sector representation



Region representation



Gender representation



Key:
 IGO – Intergovernmental Organisation
 NGO – Non-governmental Organisation

Q1. What steps toward adopting lead paint laws have been taken in your country? Include details of stakeholder engagement, development of a law and any awareness raising activities.

BENIN (La Grande Puissance de Dieu – NGO)	<ul style="list-style-type: none"> - Lead paint is not regulated by the government yet. - Efforts are on-going for the regulation. - NGO LA GRANDE PUISSANCE DE DIEU is currently motivating Government to attend to this objective.
COLOMBIA (NCPC Colombia and Colnodo – NGOs)	<ul style="list-style-type: none"> - 2015, Bill No. 148: provisions for the right of children to develop physically and intellectually in a lead-free environment and established limits for the content of lead in products marketed in Colombia. - Initiative that regulates the use of lead in Colombia is approved by the Senate, now awaiting the presidential sanction. - Development of the Regulatory Impact Analysis process has begun as a requirement for technical regulation for lead in paint.
DR CONGO (African Green Society – NGO)	<ul style="list-style-type: none"> - Have not implemented a project on lead paint.
ECUADOR (NCPC Ecuador – NGO)	<ul style="list-style-type: none"> - Working on a Technical Regulation under the Ecuadorian Quality System law that regulates the lead content in various types of paints. - The Ministry of Production is in charge of enforcing this law.
JAMAICA (CARPIN – NGO)	<ul style="list-style-type: none"> - Stakeholder meeting was hosted by Ministry of Economic Growth and Job Creation where all agreed to limit lead in paint.
MALAYSIA (Malaysia Paint Manufacturers Association – Industry)	<ul style="list-style-type: none"> - No currently existing lead paint law. - On-going talks with government are underway. - The International Pollutants Elimination Network (NGO) and industry association have been promoting elimination of lead paint and hope to work with government to draft a law.
PERU (Ministry of Environment – Government)	<ul style="list-style-type: none"> - Framework carried out within SAICM GEF project lead in paint component. - The National Cleaner Production Centre (NCPC) is engaged in the project, together with the NCPCs from Ecuador and Colombia. - A technical support committee formed in Peru with 8 representatives from public sector, 7 from private sector and 2 from academia. - Committee has drafted a law regulating lead in paints.
PHILIPPINES (IPEN – NGO)	<ul style="list-style-type: none"> - Civil society and industry worked together, reached out to government to promote adoption of a mandatory lead paint limit of 90ppm total lead.
SERBIA (NCPC Serbia – NGO)	<ul style="list-style-type: none"> - Serbia harmonizes with the EU lead paint law. - Using REACH provisions and have successfully phased out lead from most paints. - Some exceptions still exist - certain industrial applications and artistic paints.
SOUTH AFRICA (Department of Environment, Forestry and Fisheries – Government)	<ul style="list-style-type: none"> - COVID-19 has caused delays of awareness-raising and publishing of draft lead paint legislation for public comment - A Technical Working Group (comprised of South African Paint Manufacturing Association, Chemicals & Allied Industries Association, Department of Health and Department of Environment, Forestry and Fisheries) is working at revising the existing law and developing new regulations - Aim is to limit lead in paint to 90ppm. - Several opportunities for stakeholder engagement have been made.
SOUTH AFRICA (University of Cape Town – Academia)	<ul style="list-style-type: none"> - Limited awareness for the general population on health risks linked to lead.
ZAMBIA (Children's Environmental Health Foundation – NGO)	<ul style="list-style-type: none"> - Has been successful in stakeholder engagement and awareness raising. - Bureau of Standards has developed and gazetted voluntary Paint Standard 1185 which limits lead in paint to 90ppm. - Enforcement of standard by Ministry of Health, Zambia Environmental Management Agency and Zambia Bureau of Standards.

Poll 1 Results (N=15)

Does your country have a law related to lead in paint? Yes: 9

Not sure if your country has a law? Click this link: <https://chemicalswithoutconcern.org/content/lead-paint-law-map>

Poll 2 (N=8): How many of you are regularly involved in awareness raising activities on the health hazards of lead in paint in your country?

Yes: 6 No: 2

Poll 3 (N=9): Does your country do regular spot testing of levels of lead in paint at points of sale (even those stating to be lead free)?

Yes: 1 No: 8

Note: It was clarified that the suggested approach to regulating lead paint in the Model Law is that the main responsibility for testing falls on the manufacturer to document that the paint meets at 90 ppm limit but the government also has authority to test paint.

Note: Other opportunities raised included having existing related laws which would avoid creating a new regulatory framework. Other challenges raised included enforcement of existing laws and getting multi-stakeholders support.

Q2. What are some challenges and opportunities you have faced in your country when it has come to adopting lead paint laws?

Q2: A - OPPORTUNITIES

American Chemet Corporation – Industry	<ul style="list-style-type: none">- The World Coatings Council (WCC) membership consists of associations serving the paint and coatings industry in many countries around the world.- As associations, their members include companies that manufacture paint and coatings, including major global firms as well as regional or national SME's.- WCC representatives serve on the Technical Advisory Group for the Lead Paint Alliance.- You can contact the WCC through the Alliance for industry information and perhaps get an industry Lead Paint Alliance contact in your country
BENIN (LGPD – NGO)	<ul style="list-style-type: none">- NGO LA GRANDE PUISSANCE DE DIEU is working to encourage government action on lead paint regulation.- Paint companies have removed a product named leadium, which contained a great quantity of lead.
PERU (Ministry of Environment – Government)	<ul style="list-style-type: none">- Identified a General Law as being the best option for regulating lead in paint.
SUDAN (Sudanese environment Conservation Society – NGO)	<ul style="list-style-type: none">- Engagement with relevant stakeholders plays an important role.
UNEP – IGO	<ul style="list-style-type: none">- XRF analyzers for lead paint law enforcement.- Available resource to promote action include:<ul style="list-style-type: none">o Model Law and Guidance on Regulating Lead Paint: https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-painto Lead Paint Reformulation Technical Guidelines: http://www.saicm.org/Portals/12/Documents/GEF-Project/Lead-Paint/Lead_Paint_TG_Draft_25032019.pdf- New FAQs. https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint-2
WHO – (IGO)	<ul style="list-style-type: none">- WHO has recently published its update to the guidance on measuring lead in paint at https://www.who.int/publications/i/item/9789240006058- WHO can support in providing awareness raising materials.- Launching 2020 International Lead Poisoning Prevention Week website in the next couple of weeks where materials will be available https://www.who.int/ipcs/lead_campaign/en/
ZAMBIA (Children's Environmental Health Foundation – NGO)	<ul style="list-style-type: none">- Voluntary standard can form basis for mandatory law.- Support from paint industry and Zambia Institute of Environmental Health.

Q2: B - CHALLENGES

COLOMBIA (NCPC Colombia and Colnodo – NGO)	<ul style="list-style-type: none"> - Uncertainty about testing for and documenting conformity with 90ppm and deadlines for phase out. - No accredited laboratories currently exist. - Timeframe to develop a technical regulation is two years. - Regulatory impact analysis is necessary but has not been done yet. - Ability to reach the small enterprises. - Capacity building to phase out lead from paints. - A lot of awareness raising, and outreach needs to be done. - Ability to reach out to the many small paint companies, economic and technological capacity needed to reformulate, importers and suppliers need to commit on phasing out to not selling lead-based pigments from the national market.
DR CONGO (African Green Society – NGO)	<ul style="list-style-type: none"> - Difficult to have a law on the manufacture and production of paints (90 ppm)
JAMAICA (CARPIN – NGO)	<ul style="list-style-type: none"> - Government needs testing capacity to ensure that there is monitoring of imported paints by the Bureau of Standards.
PERU (Ministry of Environment – Government)	<ul style="list-style-type: none"> - Determining the appropriate legal framework to regulate lead paint (general law vs. specific technical regulations) - Determining the paints covered by a law (e.g., household and industrial) and limits for different types of paints
MALAYSIA (Malaysia Paint Manufacturers Association – Industry)	<ul style="list-style-type: none"> - Poor government buy-in - Need to find the appropriate government department
MEXICO (Ministry of Health – Government)	<ul style="list-style-type: none"> - Illegal import of products from abroad
SOUTH AFRICA (Department of Environment, Forestry and Fisheries – Government)	<ul style="list-style-type: none"> - Availability of accredited laboratories and portable hand-held instruments that can detect lead paint below 90 ppm. - Lack of import control
ZAMBIA (Children's Environmental Health Foundation – NGO)	<ul style="list-style-type: none"> - Government ministries need to work together and needs support to establish a lead paint law - Intersectional cooperation on lead paint regulation needs to happen in government

Q3. What are some accomplishments and lessons learned in carrying out any of these steps? What are two key pieces of advice you would give to other countries implementing lead paint laws?

Q3: ACCOMPLISHMENTS, ADVICE AND LESSONS LEARNED

COLOMBIA (NCPC Colombia and Colnodo – NGO)	<ul style="list-style-type: none"> - Multi-stakeholder engagement. - The law is necessary, but it must be clear and adjusted to the context of the country in order to comply. - Alternative raw materials exist on the market, although there is much concern about costs. - Small companies are very artisanal, consultancies must be done hand in hand with suppliers.
IPEN – NGO	<ul style="list-style-type: none"> - Enforcement and monitoring industry compliance is key in making sure the law is upheld. - In the Philippines, the civil society had to reach out to other government agencies like Education, Social Work, and Local Government, to draft supplementary lead safe paint procurement laws that will support the main lead paint law. - Monitoring of imported illegal paints.
JAMAICA (CARPIN – NGO)	<ul style="list-style-type: none"> - Paints manufactured in Jamaica comply with the present limit of 90 ppm - Real focus now is to ensure that paints that do not comply with this limit do not get into our country.
SERBIA (NCPC Serbia – NGO)	<ul style="list-style-type: none"> - The most important thing is the enforcement of the law (if exists). - The suppliers of lead-free pigments/additives are the best source of knowledge. - To produce lead-additive-free paint, companies can use the same equipment, no additional investments needed.

SOUTH AFRICA (Department of Environment, Forestry and Fisheries – Government) UNEP – IGO	<ul style="list-style-type: none"> - Interested in enforcement at ports of entry as we are currently procuring XRF analyzers for placement at ports of entry.
ZAMBIA (Children's Environmental Health Foundation – NGO)	<ul style="list-style-type: none"> - Important to have national coordination mechanism or institutional strengthening to address the issue of lead. - In terms of cost of reformulation, this is minimal compared to the health and environmental benefits of shifting to lead-free alternatives. - Engaging a wide range of stakeholders, including policy and decision makers, technocrats, as well as the traditional and civic leaders and communities. - Identifying community Champions who are natural leaders in the community that can help in explaining on effect lead exposure to children.

Lead in Paint Community of Practice Discussion 1 Summary: Looking Ahead

1. Participants expressed interest in developing lead paint legislation. Several countries have demonstrated successes.
2. The Lead Paint Alliance has demonstrated success in promoting lead paint legislation around the world and efforts should continue and be enhanced.
3. As of June 2020, 75 countries have passed lead paint laws. The SAICM GEF project on Emerging Policy issues is working with governments to support the development of lead paint laws and working with Small and Medium Enterprises (SMEs) to promote the phase-out of the use of lead paint additives. Appropriate indicators and targets that assess that industry compliance can be a tool to ensure lead paint laws are adhered to in the countries the project is working in.
4. Lead Paint provides an example of how to promote guidance on minimum standards related to specific chemicals to assist under-resourced countries. This could be demonstrated in other sectors.

Helpful resources:

- **Model Law and Guidance for Regulating Lead Paint** in 6 languages: <https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-paint>
- **Lead Paint Reformulation Technical Guidelines:** http://www.saicm.org/Portals/12/Documents/GEF-Project/Lead-Paint/Lead_Paint_TG_Draft_25032019.pdf
- **Lead Paint Alliance FAQs.** <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint-2>
- **WHO Guidance on Lead Paint Testing:** <https://www.who.int/publications/i/item/9789240006058>

LiP COP: The Secretariat of the Strategic Approach to International Chemicals Management (SAICM) and the Environmental Health Division at the University of Cape Town (UCT) created this Community of Practice (CoP) to foster online discussions and address key issues on Lead in Paint (LiP) among stakeholders from governments, international organizations, industry, academia and civil society. This CoP is contributing to the SAICM/GEF project on Emerging Chemicals Policy Issues Knowledge Management Component. This activity is supported by the Global Environment Facility (GEF) project ID: 9771 on *Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)*.

If you have any question or require clarification on this initiative, please contact the SAICM Secretariat at saicm.chemicals@un.org or UCT at uctcops@outlook.com.

Join the LiP CoP at: <https://saicmknowledge.org/community>

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COMMUNITY OF PRACTICE ON LEAD IN PAINT

Organized by the SAICM Secretariat and the University of Cape Town

Numéro: 1 de 2020

Date de discussion : 9 Juin 2020

Discussion 1 Digest, French Translation : Résumé de la discussion

Topic de discussion : Etapes vers l'adoption de lois nationales sur les peintures au plomb.

La première discussion de la LiP CoP, présentée par Angela Bandemehr de l'US EPA, a examiné trois questions focalisant sur le développement et l'adoption de lois sur les peintures au plomb qui sont essentielles à l'élimination à succès de la peinture au plomb dans un pays. **L'Alliance mondiale pour éliminer la peinture au plomb** ou **l' Alliance de la peinture au plomb** (voir: <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint>) décrit une série d'étapes vers des lois qui ont été utiles dans les pays qui ont adopté des lois dans *les étapes vers la fiche d'information juridiques* (voir Ressources ci-dessous). Étant donné que chaque pays peut rencontrer des défis uniques lorsqu'il s'agit de développer et d'adopter des lois sur les peintures au plomb, il était important de les prendre en compte au cours de la discussion. Les participants ont été encouragés à examiner comment les pays peuvent s'engager avec les parties prenantes, aborder le mécanisme technique et réglementaire de rédaction d'une loi et sensibiliser le public. travaille depuis 20 ans à l'établissement et à la mise en

À PROPOS DU PRÉSENTATEUR



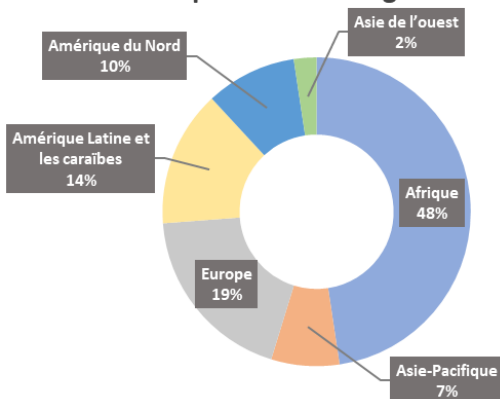
Angela Bandemehr est gestionnaire principale du programme environnemental international au Bureau des affaires mondiales et de la politique du Bureau des affaires internationales et tribales de l'Agence américaine de protection de l'environnement, où elle

œuvre de partenariats et de projets internationaux efficaces pour résoudre les problèmes environnementaux mondiaux. L'US EPA est le président de l'Alliance mondiale pour l'élimination de la peinture au plomb.

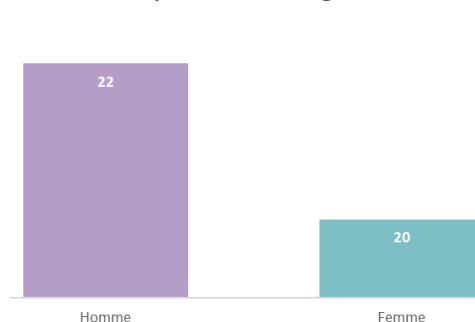
DISCUSSION 1 RÉPARTITION DES PARTICIPATIONS

TOTAL DES PARTICIPANTS À LA DISCUSSION 1 : 42

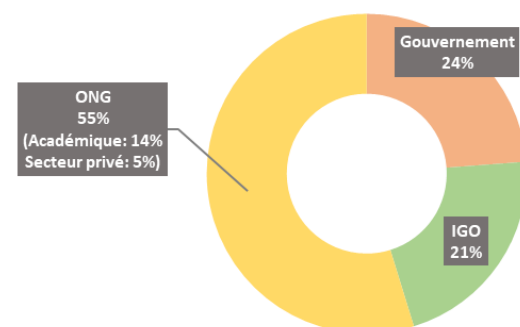
Représentation régionale



Représentation du genre



Représentation du secteur



Key:
IGO – Organisation Intergouvernementale
ONG – Organisation non-gouvernementale

Q1. Quelles mesures ont été prises pour adopter des lois sur les peintures au plomb dans votre pays ? Incluez des détails sur l'engagement des parties prenantes, le développement d'une loi et toute activité de sensibilisation.

BÉNIN (La Grande Puissance de Dieu – NGO)	<ul style="list-style-type: none"> - La peinture au plomb n'est pas encore réglementée par le gouvernement. - Des efforts sont en cours pour la réglementation. - L'ONG LA GRANDE PUISSANCE DE DIEU incite actuellement le gouvernement à atteindre cet objectif.
COLOMBIE (NCPC Colombia and Colnodo – NGOs)	<ul style="list-style-type: none"> - 2015, projet de loi n ° 148: dispositions pour le droit des enfants de se développer physiquement et intellectuellement dans un environnement sans plomb et des limites fixées pour la teneur en plomb des produits commercialisés en Colombie. - L'initiative qui réglemente l'utilisation du plomb en Colombie est approuvée par le Sénat, en attente de la sanction présidentielle. - Le développement du processus d'analyse d'impact de la réglementation a commencé comme exigence de la réglementation technique pour le plomb dans les peintures.
RD CONGO (African Green Society – NGO)	<ul style="list-style-type: none"> - N'ont pas mis en œuvre de projet sur la peinture au plomb.
EQUATEUR (NCPC Ecuador – NGO)	<ul style="list-style-type: none"> - Travaille sur un règlement technique en vertu de la loi équatorienne sur le système de qualité qui réglemente la teneur en plomb dans divers types de peintures. - Le Ministère de la Production est chargé de faire appliquer cette loi.
JAMAÏQUE (CARPIN – NGO)	<ul style="list-style-type: none"> - La réunion des parties prenantes a été organisée par le ministère de la Croissance économique et de la Création d'emplois où tous ont convenu de limiter le plomb dans la peinture.
MALAISIE (Malaysia Paint Manufacturers Association – Industry)	<ul style="list-style-type: none"> - Aucune loi actuelle sur les peintures au plomb. - Des pourparlers en cours avec le gouvernement sont en cours. - Le Réseau international pour l'élimination des polluants (ONG) et l'association de l'industrie ont encouragé l'élimination de la peinture au plomb et espèrent travailler avec le gouvernement pour rédiger une loi.
PÉROU (Ministry of Environment – Government)	<ul style="list-style-type: none"> - Cadre réalisé dans le cadre du projet SAICM GEF chef de projet dans la composante peinture. - Le Centre national de production plus propre (CNPC) est engagé dans le projet, avec les CNPC de l'Équateur et de la Colombie. - Un comité de soutien technique formé au Pérou avec 8 représentants du secteur public, 7 du secteur privé et 2 du monde universitaire. - Le comité a rédigé une loi réglementant le plomb dans les peintures.
PHILIPPINES (IPEN – NGO)	<ul style="list-style-type: none"> - La société civile et l'industrie ont travaillé ensemble, ont contacté le gouvernement pour promouvoir l'adoption d'une limite de peinture au plomb obligatoire de 90 ppm de plomb total.
SERBIE (NCPC Serbia – NGO)	<ul style="list-style-type: none"> - La Serbie s'harmonise avec la loi européenne sur les peintures au plomb - Utilise les dispositions de REACH et avoir éliminé avec succès le plomb de la plupart des peintures - Certaines exceptions existent encore - certaines applications industrielles et peintures artistiques.
AFRIQUE DU SUD (Department of Environment, Forestry and Fisheries – Government)	<ul style="list-style-type: none"> - La COVID-19 a retardé la sensibilisation et la publication d'un projet de loi sur les peintures au plomb pour commentaires du public. - Un groupe de travail technique (composé de l'Association sud-africaine de la fabrication de peintures, de l'Association des industries chimiques et alliées, du ministère de la Santé et du ministère de l'Environnement, des Forêts et des Pêches) travaille à la révision de la loi existante et à l'élaboration de nouvelles réglementations - L'objectif est de limiter le plomb dans la peinture à 90 ppm. - Plusieurs opportunités d'engagement des parties prenantes ont été faites.
AFRIQUE DU SUD (University of Cape Town – Academia)	<ul style="list-style-type: none"> - Sensibilisation limitée de la population générale aux risques pour la santé liée au plomb.
ZAMBIE (Children's Environmental Health Foundation – NGO)	<ul style="list-style-type: none"> - A réussi l'engagement des parties prenantes et la sensibilisation. - Le Bureau of Standards a développé et publié la norme volontaire de peinture 1185 qui limite le plomb dans la peinture à 90 ppm. - Application de la norme par le ministère de la Santé, l'Agence zambienne de

Résultats du sondage 1 (N = 15) :
 Votre pays a-t-il une loi relative au plomb dans la peinture?
 Oui: 9 Non: 5

Vous ne savez pas si votre pays a une loi ? Cliquez sur ce lien :
<https://chemicalswithoutconcern.org/content/lead->

Résultats du sondage 2 (N = 8): Combien d'entre vous participent régulièrement à des activités de sensibilisation sur les dangers pour la santé du plomb dans la peinture dans votre pays ? Oui: 6 Non: 2

Remarque: Parmi les autres opportunités soulevées, citons le fait d'avoir des lois connexes existantes qui éviteraient de créer un nouveau cadre réglementaire.

Résultats du sondage 3 (N=9): Votre pays effectue-t-il régulièrement des tests ponctuels des niveaux de plomb dans la peinture dans les points de vente (même ceux déclarant être sans plomb)?

Remarque: Il a été précisé que l'approche suggérée pour réglementer la peinture au plomb dans la Loi type est que la responsabilité principale des essais incombe au fabricant de documenter que la peinture respecte la limite de 90 ppm, mais que le

Q2. Quels sont les défis et opportunités auxquels vous avez été confrontés dans votre pays en ce qui concerne l'adoption de lois sur les peintures au plomb?

Q2: A - OPPORTUNITIES

American Chemet Corporation – Industrie

- Les membres du World Coatings Council (WCC) sont des associations au service de l'industrie de la peinture et des revêtements dans de nombreux pays du monde.
- En tant qu'associations, leurs membres comprennent des entreprises qui fabriquent des peintures et des revêtements, y compris de grandes entreprises mondiales ainsi que des PME régionales ou nationales.
- Des représentants du WCC siègent au groupe consultatif technique de la Lead Paint Alliance.
- Vous pouvez contacter le WCC via l'Alliance pour obtenir des informations sur l'industrie et peut-être obtenir un contact de l'Alliance Lead Paint dans votre pays.

BÉNIN (LGPLD - ONG) -

- L'ONG LA GRANDE PUISSANCE DE DIEU s'emploie à encourager l'action gouvernementale sur la réglementation des peintures au plomb.
- Les entreprises de peinture ont supprimé un produit appelé plombium, qui contenait une grande quantité de plomb.

PÉROU (Ministère de l'Environnement - Gouvernement)

- A identifié une loi générale comme étant la meilleure option pour réglementer le plomb dans la peinture.

SOUDAN (Société soudanaise de conservation de l'environnement - ONG)

- L'engagement avec les parties prenantes concernées joue un rôle important.

UNEP - IGO

- Analyseurs UNEP - IGO - XRF pour l'application de la loi sur les peintures au plomb.
- Les ressources disponibles pour promouvoir l'action comprennent
 - o Loi type et directives sur la réglementation de la peinture au plomb: <https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-paint>
 - o Directives techniques de reformulation de peinture au plomb: <http://www.saicm.org/Portals/12/Documents/GEF-Project/Lead-Paint/Lead Paint TG Draft 25032019.pdf>
- New FAQs. <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint-2>

OMS - (OIG)

- L'OMS a récemment publié sa mise à jour des directives sur la mesure du plomb dans la peinture à l'adresse

<https://www.who.int/publications/i/item/9789240006058>

- L'OMS peut apporter son soutien en fournissant du matériel de sensibilisation.
- Lancement du site Web de la Semaine internationale de prévention de l'empoisonnement au plomb 2020 dans les prochaines semaines, où le matériel sera disponible

https://www.who.int/ipcs/lead_campaign/en/

- ZAMBIE**
(Children's Environmental Health Foundation - ONG)
- Une norme volontaire peut constituer la base d'une loi impérative.
 - Soutien de l'industrie de la peinture et de l'Institut zambien de la santé environnementale

Q2: B - CHALLENGES

- COLOMBIE**
(NCPC Colombie et Colnodo - ONG)
- Incertitude quant aux tests et à la documentation de la conformité à 90 ppm et aux délais d'élimination.
 - Aucun laboratoire accrédité n'existe actuellement.
 - Le délai pour l'élaboration d'un règlement technique est de deux ans.
 - Une analyse d'impact de la réglementation est nécessaire mais n'a pas encore été réalisée.
 - Capacité à atteindre les petites entreprises.
 - Renforcement des capacités pour éliminer le plomb des peintures
 - Il faut faire beaucoup de sensibilisation et de sensibilisation.
 - Capacité à atteindre les nombreuses petites entreprises de peinture, capacité économique et technologique nécessaire pour reformuler, les importateurs et les fournisseurs doivent s'engager à ne plus vendre de pigments à base de plomb sur le marché national.
- RD CONGO**
(African Green Society – NGO)
- Difficile d'avoir une loi sur la fabrication et la production de peintures (90 ppm).
- JAMAÏQUE**
(CARPIN – NGO)
- Le gouvernement a besoin d'une capacité de test pour s'assurer qu'il y a un contrôle des peintures importées par le Bureau de des normes.
- PÉROU**
(Ministère de l'Environnement - Gouvernement)
- Détermination du cadre juridique approprié pour réglementer la peinture au plomb (loi générale vs réglementations techniques spécifiques)
 - Déterminer les peintures couvertes par une loi (par exemple, domestiques et industrielles) et les limites pour différents types de peintures
- MALAISIE**
(Association des fabricants de peinture de Malaisie - Industrie)
- Faible adhésion du gouvernement.
 - Besoin de trouver le service gouvernemental approprié.
- MEXIQUE**
(Ministère de la Santé - Gouvernement)
- Importation illégale de produits de l'étranger
- AFRIQUE DU SUD**
(Ministère de l'Environnement, des Forêts et des Pêches - Gouvernement)
- Disponibilité de laboratoires accrédités et d'instruments portables pouvant détecter la peinture au plomb en dessous de 90 ppm.
 - Manque de contrôle des importations
- ZAMBIE**
(Children's Environmental Health Foundation - ONG)
- Les ministères gouvernementaux doivent travailler ensemble et ont besoin de soutien pour établir une loi phare sur la douleur
 - Une coopération intersectionnelle sur la réglementation des peintures au plomb doit avoir lieu au sein du gouvernement.

Q3. Quelles sont les réalisations et les leçons tirées de la mise en œuvre de l'une de ces étapes? Quels sont les deux conseils clés que vous donneriez aux autres pays qui appliquent des lois sur les peintures au plomb?

- COLOMBIE**
(CNPC Colombie et Colnodo - ONG)
- Engagement multipartite.
 - La loi est nécessaire, mais elle doit être claire et adaptée au contexte du pays pour être conforme.
 - Des matières premières alternatives existent sur le marché, même si les coûts sont très préoccupants.
 - Les petites entreprises sont très artisanales, les consultations doivent se faire main dans la main avec les fournisseurs.
- IPEN – NGO**
- L'application et le contrôle de la conformité de l'industrie sont essentiels

- pour s'assurer que la loi est respectée.
- Aux Philippines, la société civile a dû tendre la main à d'autres agences gouvernementales telles que l'éducation, le travail social et le gouvernement local, pour rédiger des lois supplémentaires sur l'achat de peinture au plomb sans danger qui soutiendront la principale loi sur les peintures au plomb.
- Surveillance des peintures illégales importées.

**JAMAÏQUE
(CARPIN – NGO)**

- Les peintures fabriquées en Jamaïque sont conformes à la limite actuelle de 90 ppm
- Le véritable objectif est maintenant de garantir que les peintures qui ne respectent pas cette limite ne pénètrent pas dans notre pays.

**SERBIE
(NCPC Serbie - ONG)**

- Le plus important est l'application de la loi (si elle existe).
- Les fournisseurs de pigments / additifs sans plomb sont la meilleure source de connaissances.
- Pour produire une peinture sans plomb sans additif, les entreprises peuvent utiliser le même équipement, aucun investissement supplémentaire n'est nécessaire.

**AFRIQUE DU SUD
(Ministère de l'Environnement,
des Forêts et des Pêches -
Gouvernement)**

- Intéressé par l'application de la loi aux points d'entrée, car nous achetons actuellement des analyseurs XRF à placer aux points d'entrée.

PNUE - OIG

- Il est important de disposer d'un mécanisme national de coordination ou d'un renforcement institutionnel pour traiter la question du plomb.
- En termes de coût de reformulation, il est minime par rapport aux avantages pour la santé et l'environnement du passage à des alternatives sans plomb.

**ZAMBIE
(Fondation pour la santé
environnementale des enfants -
ONG)**

- Impliquer un large éventail de parties prenantes, y compris les décideurs et les technocrates, ainsi que les dirigeants et les communautés traditionnels et civiques.
- Identifier les champions communautaires qui sont des leaders naturels dans la communauté qui peuvent aider à expliquer les effets de l'exposition au plomb chez les enfants.

Lead in Paint Community of Practice Discussion 1 Résumé: Le regard vers l'avant

1. Les participants ont exprimé leur intérêt pour l'élaboration d'une législation sur les peintures au plomb. Plusieurs pays ont fait preuve de succès.
2. La Lead Paint Alliance a démontré son succès dans la promotion de la législation sur les peintures au plomb à travers le monde et les efforts doivent se poursuivre et être renforcés.
3. En juin 2020, 75 pays avaient adopté des lois sur les peintures au plomb. Le projet SAICM GEF sur les questions de politique émergente travaille avec les gouvernements pour soutenir l'élaboration de lois sur les peintures au plomb et avec les petites et moyennes entreprises (PME) pour promouvoir l'élimination de l'utilisation d'additifs pour peintures au plomb. Des indicateurs et des cibles appropriés qui évaluent la conformité de l'industrie peuvent être un outil pour s'assurer que les lois sur les peintures au plomb sont respectées dans les pays dans lesquels le projet travaille.
4. La peinture au plomb donne un exemple de la manière de promouvoir des directives sur les normes minimales relatives à des produits chimiques spécifiques pour aider les pays à faibles ressources. Cela pourrait être démontré dans d'autres secteurs.

Ressources utiles:

- **Loi type et directives pour la réglementation de la peinture au plomb en 6 langues :** <https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-paint>
- **Directives techniques de reformulation de peinture au plomb :** [http://www.saicm.org/Portals/12/Documents/GEF-Project/Lead-Paint/Lead Paint TG Draft 25032019.pdf](http://www.saicm.org/Portals/12/Documents/GEF-Project/Lead-Paint/Lead%20Paint%20TG%20Draft%2025032019.pdf)
- **FAQ Lead Paint Alliance.** <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint-2>

- **Guide de l'OMS sur les tests de peinture au plomb** : <https://www.who.int/publications/i/item/9789240006058>
-

LiP CoP: Le Secrétariat de l'Approche stratégique de la gestion internationale des produits chimiques (SAICM) et la Division de la santé environnementale de l'Université du Cap (UCT) ont créé cette communauté de pratique (CoP) pour favoriser les discussions en ligne et traiter des questions clés sur le plomb dans la peinture (LiP) parmi les parties prenantes des gouvernements, des organisations internationales, de l'industrie, du monde universitaire et de la société civile. Cette CdP contribue au projet SAICM / FEM sur la composante de gestion des connaissances sur les questions de politique émergente en matière de produits chimiques.

Cette activité est soutenue par le projet ID: 9771 du Fonds pour l'environnement mondial (FEM) sur les meilleures pratiques mondiales sur les nouveaux problèmes de politique chimique préoccupants dans le cadre de l'Approche *stratégique de la gestion internationale des produits chimiques (SAICM)*.

Si vous avez des questions ou souhaitez des éclaircissements sur cette initiative, veuillez contacter le Secrétariat de la SAICM à saicm.chemicals@un.org ou UCT à uctcops@outlook.com.

Rejoignez le LiP CoP au: <https://saicmknowledge.org/community>

Avis de non-responsabilité : Les informations contenues dans ce recueil représentent les opinions des membres participant de différents groupes de parties prenantes exprimées au cours de la discussion. Les opinions exprimées dans ce document ne représentent pas nécessairement l'opinion ou la politique déclarée du Programme des Nations Unies pour l'environnement, du Secrétariat de la SAICM, du FEM ou de l'UCT, et la citation de noms commerciaux ou de procédés commerciaux ne constitue pas une approbation.

COMMUNITY OF PRACTICE ON

LEAD IN PAINT

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 2 of 2020

Discussion date: 18th August 2020

Discussion Digest 2

Topic of Discussion: Setting low limits for lead in paint

The second LiP CoP discussion, presented by Desiree Narvaez from UNEP, Steve Wolfson from US EPA and Amanda Rawls from ABA-ROLI, reviewed three questions focusing on the legal aspects of setting low limits for lead in paint. Legally binding limits on the lead content in paint are necessary to eliminate 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** (<https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-paint>) provides sample legal text for a 90ppm limit, which is the lowest technically feasible limit to date. **To view the PowerPoint presentation of the discussion, click [here](#).**

ABOUT THE PRESENTERS



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 years. 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



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.



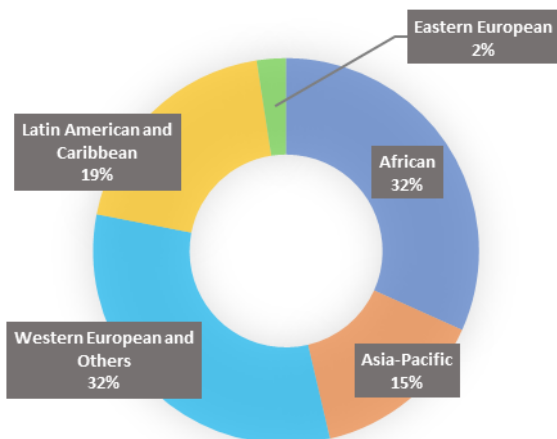
Amanda Rawls is lawyer and development professional currently based in Amman, Jordan.

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.

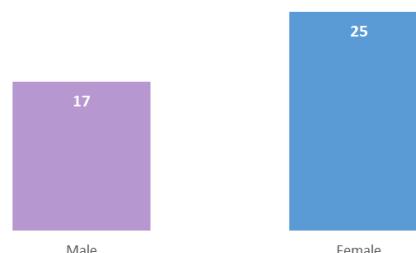
DISCUSSION 2 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION 2: 43

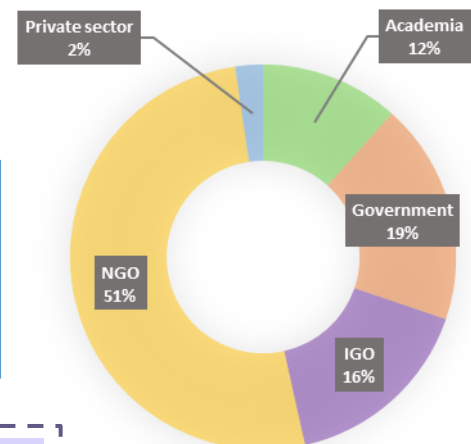
Regional representation



Gender representation



Sector representation



Key:
IGO – Intergovernmental Organisation
NGO – Non-governmental Organisation

Lead in Paint Community of Practice Discussion 2 Summary: Looking Ahead

1. Participants from several countries shared actions taken to transition to a specific mandatory legal limit on lead in paint. Several countries have demonstrated success to establish 90 ppm or other limits, others are still in the process of establishing limit, and others have not started. Actions looking ahead to transition to a specific mandatory legal limit on lead in paint should take into consideration the Model Law, which recommends setting a 90 ppm for all domestically manufactured and imported paint containing lead, and prohibiting imports of paint exceeding the limit, which will reduce risks to human health, particularly children.
2. In some countries, stakeholders have raised concerns regarding achieving a 90 ppm limit for certain (industrial, marine, vehicle) paints on the same timeframe as household paints. Concerns had not been addressed in every case, but some participants noted a variety of ways they have been addressed, including setting different phase-out periods for certain paints.
3. Compliance or enforcement provisions can assist with making a 90ppm limit effective. Some participants noted existing mechanisms, such as certification of paints, prohibition of lead-containing additives, fines, testing requirements and random trade inspections, and in some countries enforcement provisions still need to be developed. Participants noted that awareness raising can help with facilitating compliance. Although not reported as being widely used, some Model Law provisions that encourage documentation of compliance with a limit, such as Declarations of Conformity.

Inputs to the discussion from participants

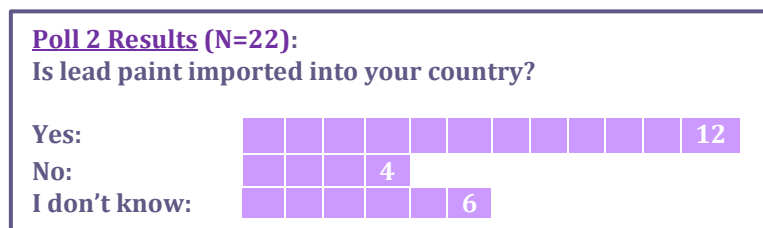
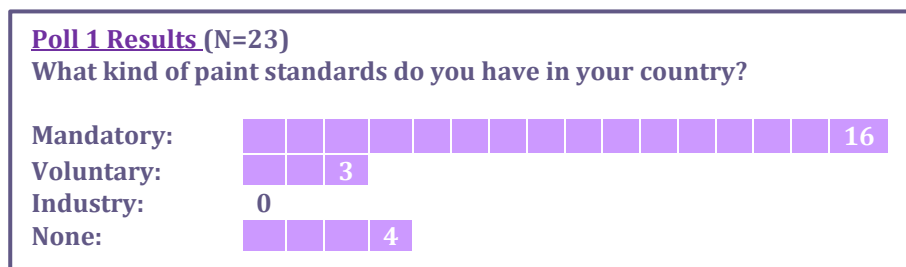
Q1. What actions has your country taken to transition to a specific mandatory legal limit on lead in

AUSTRALIA (Monash University – Academia)	<ul style="list-style-type: none"> - The recommended amount of lead in domestic paint has declined from 50 per cent before 1965, to 1 per cent in 1965. - In 1992, it was reduced to 0.25 per cent, and in 1997 it was further reduced to 0.1 per cent. <p>Note: 0.1 percent = 1,000 ppm; Australia’s limit is mandatory</p>
BANGLADESH (Environment and Social Development Organisation – NGO)	<ul style="list-style-type: none"> - Bangladesh Standards and Testing Institutions (BSTI), the relevant government authority, has mandated the legal limit of 90ppm for lead in paint of Bangladesh. - The lead paint law was established in 2018 for manufacturing industries who are producing household paint and it is a mandatory law. - All decorative paints in the markets are monitored and companies found disobeying are reported. - Every paint must have been tested and met the lead limit before going to market. - Third party certification of lead safe paint is also ongoing.
CAMEROON (Jeunes Volontaires pour l’Environnement – NGO)	<ul style="list-style-type: none"> - A regulation was signed in 2017 to ban manufacturing, import and sale of lead paint above 90 ppm. - This 90 ppm limit is mandatory for all types paint.
COLOMBIA (NCPC – NGOs)	<ul style="list-style-type: none"> - Colombia has recently released Law 2041 of July 27th, 2020, which sets the limit of 90 ppm for decorative paints in a transitory way. - This establishes that a technical regulation must be developed within 2 years. - Efforts are now focused on the technical regulation to complement the law.
DR CONGO (African Green Society – NGO)	<ul style="list-style-type: none"> - Nothing has been established yet.
ECUADOR (CEER – NGO)	<ul style="list-style-type: none"> - Technical Regulation 061, which regulates the lead content in paints, is currently in the process of being approved. - A limit of 100 ppm has been proposed for direct contact paints and 600 ppm for industrial paints. - A proposal to reduce the limit for direct contact paints to people from 100 to 90 ppm has been put forward. - No answer has been provided from INEN (Institute of Ecuadorian Standardization) yet.
ETHIOPIA (Pesticide Action Nexus – Ethiopia – NGO)	<ul style="list-style-type: none"> - Ethiopia gave a one-year grace period from the time of enactment of the law to eliminate lead in paint. - 90 ppm is the current limit.
INDIA (Toxics Link – NGO)	<ul style="list-style-type: none"> - The government of India issued the “Regulation on Lead contents in Household and Decorative Paints Rules, 2016” on 1st November 2016 which came into force from 1st November 2017. - The limit is 90 ppm. - Toxics Link started a campaign in 2008 where multiple reports highlighted the

	<p>high lead content in paint samples.</p> <ul style="list-style-type: none"> - In 2011 many brands voluntarily adopted the 90 ppm standard. - The Government decided to create a law in 2016.
IRAN (University of Tehran)	<ul style="list-style-type: none"> - Alerts about lead in paint are currently in existence. - Awareness raising efforts on the effects on wildlife have been done.
ISRAEL (Ministry of Health – Government)	<ul style="list-style-type: none"> - New 90 ppm limit on all paints will go into force in January.
JAMAICA (CARPIN – NGO)	<ul style="list-style-type: none"> - A meeting was held with stakeholders and an agreement was reached to support a legal limit. - The next step is for a formal communication from the relevant government agency/department on the way forward after discussion and agreement.
MEXICO (Casa Cem-Vias Verdes AC – NGO)	<ul style="list-style-type: none"> - There is a norm for labelling but no legal limit. <p>Note: Mexico has a current legal limit of 600 ppm</p> <ul style="list-style-type: none"> - There is a draft for a new labelling norm with a 90 ppm limit.
NIGERIA (Sustainable Research and Action for Environmental Development – NGO)	<ul style="list-style-type: none"> - Standards organisation facilitated several stakeholder meetings with the Paint Manufacturers Association and other stakeholders to agree on 90ppm lead in paint standard for Nigeria. - The standard was finalised in 2016. - SRADEV an NGO started a nationwide campaign in 2009 and had consultations with all key stakeholders prior to SON mandated to set the standard. - In 2019 the National Environmental Standards Regulatory Enforcement Agency (NESREA) drafted a comprehensive regulation, which is setting an obligatory 90ppm standard for LiP. - The regulation is currently at the stage of stakeholder review before being finalised into law.
PHILIPPINES (IPEN – NGO)	<ul style="list-style-type: none"> - The Philippines, through the Department of Environment and Natural Resources, established a Chemical Control Order (CCO) for Lead and Lead Compounds in 2013. - The CCO prohibits the use of lead compounds in the production/manufacturing of all types of paints, including industrial paints (as a pigment, a drying agent, or for some intentional use) with more than 90 ppm total limit.
SENEGAL (Pan Africa – NGO)	<ul style="list-style-type: none"> - Our stakeholders and policy makers do not have any information about lead in paint. - Pan Africa conducted a study with support from IPEN to gain information.
SERBIA (NCPC Serbia – NGO)	<ul style="list-style-type: none"> - Legislative and institutional framework for chemical sound management has been established and harmonized with EU legislation. - Reduction of placing on the market and use of paints that contain lead for industrial use after 2012. - Central staff, enforcement authorities and industry have adequate knowledge on chemicals sound management. - Awareness-raising activities are carried out continuously and the Republic of Serbia has help-desk for chemicals and best practices for supporting industry, NGOs and other stakeholders. - Serbia adopted EU REACH legislation.
SOUTH AFRICA (SAPMA – NGO)	<ul style="list-style-type: none"> - A draft regulation is currently being reviewed and going to be sent out soon for public comment and will then be gazetted. - This regulation states paint needs to have less than 90 ppm
SURINAME (Coordination Environment – Government)	<ul style="list-style-type: none"> - The Environmental Framework was adopted in May 2020, but no executive orders are yet established. - There are currently 2 paint factories and one factory that is a subsidiary of a factory in USA. All other paints and paints products are imported from USA or EU, which already have specific guidelines.
UNEP – IGO	<p>Note: UNEP representatives shared their knowledge of the status of limits in several countries</p> <ul style="list-style-type: none"> - Canada issued its first lead regulation in 1976 setting a limit of 5000 ppm. - Industry in Canada voluntarily agreed to limit lead concentrations in interior paint to match the US standard of 600 ppm in 1991. - In 2010, Canada reduced the mandatory legal limit for lead in paint from 600 ppm to 90 ppm. - While Peru is working toward legislation on lead paint, it currently has legislation on lead in toys and furniture.

- In Switzerland, lead paint has not been used since the 1950s but only specifically banned in 2003. the limit is 100 ppm.

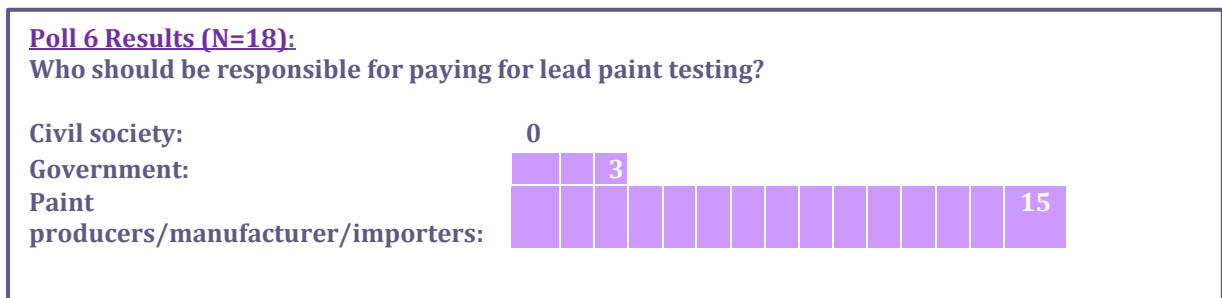
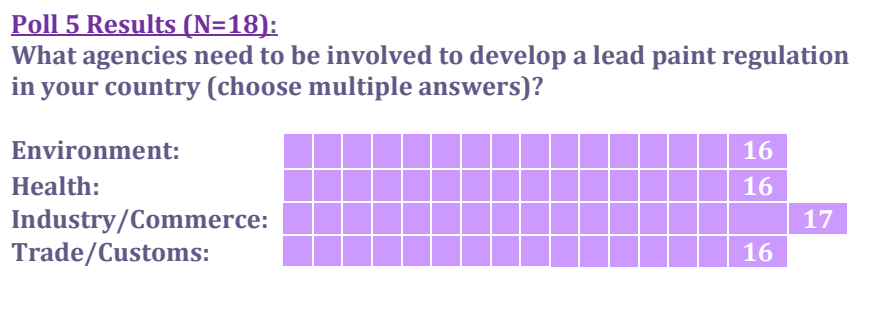
Throughout the discussion, informal polls were conducted to help encourage discussion among the participants. They do not provide any representative data.



Q2. Though the Lead Paint Alliance Model Law establishes a 90 ppm 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?

Country	Concern	How it is addressed
BANGLADESH (Environment and Social Development Organisation - NGO)	Concern was that only industrial paints were being considered for the 90 ppm limit.	ESDO is pushing for mandatory law of 90 ppm for all paint manufacturing.
COLOMBIA (NCPC - NGOs)	No clear picture for industrial, automotive or traffic paints.	Not addressed yet. Not clear how to proceed with other types of paint.
INDIA (Toxics Link - NGO)	No regulations on lead content in industrial paints.	No discussion by regulatory bodies on this concern at present.
ISRAEL (Ministry of Health - Government)	Industry's main concern was that imported paints would go untested (and would be cheaper).	Addressed by requiring testing of imported paints.
JAMAICA (CARPIN - NGO)	Concern about phase approach: which type of paint to tackle first.	No formal work with government since discussions and concern raised.
NIGERIA (Sustainable Research and Action for Environmental Development - NGO)	Agreement was reached on setting 90 ppm limit. Concern currently raised by paint manufacturing association (PMA) around an effective date of 2020.	Date needs to be reconsidered in view of the pandemic impact on industry.
SERBIA (NCPC Serbia - NGO)	Industry concern over restriction of lead paint.	Lead-pigment are forbidden in Serbia so no unintentional addition of lead
THE PHILIPPINES (IPEN - NGO)	Concern that the limit is too high (by the industry)	different transitory phase-out periods for architectural, decorative, household paints (3 years) and industrial paints (6 years)

CAMEROON (Jeunes Volontaires pour l'Environnement – NGO)	<ul style="list-style-type: none"> - Compliance is obtained when manufacturers obtain the BSTI authority seal on the paint containers. - Awareness raising with the public around lead content in paints, advocating the development of national capacity for monitoring and preventing lead poisoning in children may help to improve compliance.
COLOMBIA (NCPC Colombia – NGO)	<ul style="list-style-type: none"> - Provisions are missing that would aid compliance of law. - Focus is now moving towards technical regulations that must indicate all provisions.
ECUADOR (CEER – NGO)	<ul style="list-style-type: none"> - Only one accredited laboratory for the parameter of lead in paint is currently being used. - The Ministry of Production carries out eventual controls on the hanger (market) but it is not enough.
INDIA (Toxics Link – NGO)	<ul style="list-style-type: none"> - Regulation which specifies compliance and testing procedures are currently in existence. - Nodal agencies for implementation of the rule have been established.
JAMAICA (CARPIN – NGO)	<ul style="list-style-type: none"> - Child Protection Act speaks in short terms to the safety of children from lead in paint along with the draft health and safety bill. - There are options to look at sections of the present public health regulations and possibility for amendments. - These would complement the effectiveness of a Lead in Paint limit legal framework.
NIGERIA (Sustainable Research and Action for Environmental Development – NGO)	<ul style="list-style-type: none"> - Certification for lead paint is assessed by the standard body. - Informal paint manufacturers do not need certification to put paints on the market.
SERBIA (NCPC Serbia – NGO)	<ul style="list-style-type: none"> - Prohibition on use of lead-containing pigments/additives. - Manufacturers/importers/distributors must comply with the law. - Compliance is enforced through random trade inspection and a lab is set up at customs for imported goods to be tested.
THE PHILIPPINES (IPEN – NGO)	<ul style="list-style-type: none"> - The Philippine CCO for lead compounds require all importers, manufacturers and distributors of lead and lead compounds to submit a Compliance Certificate and register with the government the amount of lead compounds they import, produce, treat, and dispose (including lead waste generated) each year. - The lead government agency (DENR) also conducts site visitation to each legally registered paint manufacturer to check their processes, storage, and disposal of wastes. - On the part of the industry, the biggest paint manufacturers have undertaken a voluntary certification program which certifies all paints under their brands pass the 90 ppm limit. As of now, three paint manufacturers, comprising 85-90% market share, have done this.
ZAMBIA (CEHF Zambia – NGO)	<ul style="list-style-type: none"> - Zambia has put in place voluntary standard and copies of standard are in Government printer being sold at USD 70. - Communities are not accessing the standard due to distance. - Enforcement can only be achieved once the law is enacted.



Poll 7 Results (N=17):

What options would you choose to verify that paint meets a specific legal limit (choose all that apply)?

Independent lab testing paid for by manufacturers:



Government conducts spot testing at facility or in store:



Helpful 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>
- **Technical brief on Global elimination of lead paint: why and how countries should take action** can be accessed at <https://www.who.int/publications/i/item/9789240005143>
- **Policy brief on Global elimination of lead paint: why and how countries should take action** (short version) can be accessed at <https://www.who.int/publications/i/item/9789240005167>
- **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>

LIP CoP: The Secretariat of the Strategic Approach to International Chemicals Management (SAICM) and the Environmental Health Division at the University of Cape Town (UCT) created this Community of Practice (CoP) to foster online discussions and address key issues on Lead in Paint (LiP) among stakeholders from governments, international organizations, industry, academia and civil society. This CoP is contributing to the SAICM/GEF project on Emerging Chemicals Policy Issues Knowledge Management Component. This activity is supported by the Global Environment Facility (GEF) project ID: 9771 on *Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)*.

If you have any question or require clarification on this initiative, please contact the SAICM Secretariat at saicm.chemicals@un.org or UCT at uctcops@outlook.com.

Join the LiP CoP at: <https://saicmknowledge.org/community>

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COMMUNITY OF PRACTICE ON LEAD IN PAINT

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 3 of 2020
 Discussion date: 23rd September 2020

Discussion Digest 3

Topic of Discussion: Awareness-raising for lead in paint elimination

The third LiP CoP discussion, presented by Elena Jordan from WHO, Evonne Marzouk from USEPA and Sara Brosche from IPEN, reviewed three questions focusing on awareness-raising. While awareness raising about lead paint elimination is ideally undertaken consistently throughout the year, one important time for awareness raising on lead paint elimination comes in the last week of October each year, during the **International Lead Poisoning Prevention Week of action (ILPPW 2020)**, taking place from **25 to 31 October**. The aim of the ILPPW 2020 campaign is to raise awareness about health effects of lead poisoning and urge further action to eliminate lead paint through regulatory action at the country level. If you plan an event for the **Week of Action** using the [campaign materials](#), don't forget to [register!](#) You can also find what others are doing on the [List of Registered Events](#). **To view the PowerPoint presentation of the discussion, click [here](#).**

ABOUT THE PRESENTERS



Elena Jordan is a consultant at WHO in the Chemicals and health unit, responsible for lead-related projects. She is a medical doctor in preventive toxicology with advanced degrees in hygiene and public health. She has developed materials to support government decision-making, e.g. on chemicals regulation (including health and economic impacts), workers' health, and implementation of in agreements. She has organized several International Lead Poisoning Prevention Week campaigns.

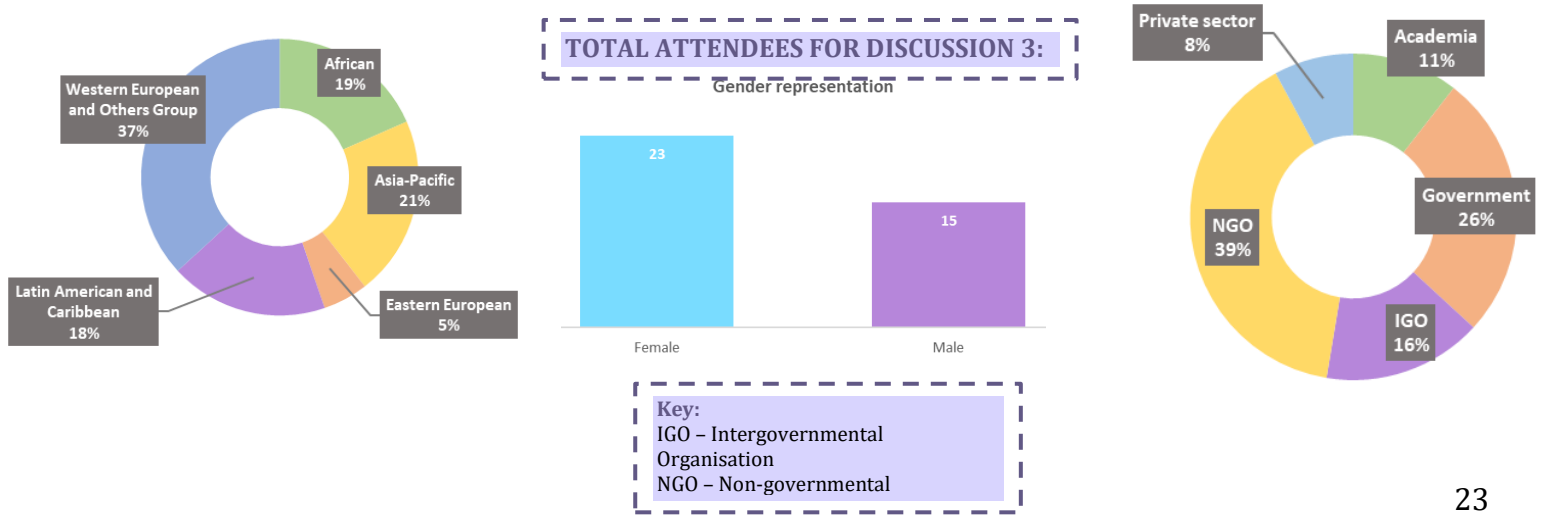


Evonne Marzouk is a communications specialist working in the Office of Global Affairs and Policy at the U.S. Environmental Protection Agency. She has played a role in international policy efforts such as the World Summit on Sustainable Development, the North American Commission on Environmental Cooperation, the Minamata Convention on Mercury, and the Global Alliance to Eliminate Lead Paint.



Sara Brosché is Science Advisor at IPEN, a global network of on profit, public interest NGOs in more than 120 countries working together for a world in which toxic chemicals are no longer produced or used in ways that harm human health and the environment. She works on wide range of issues related to chemical safety and is also manager of IPEN's Global Lead Paint Elimination Campaign, which aims to end the manufacture, import, export, sale and use of lead-containing paints and similar surface coatings worldwide.

DISCUSSION 2 ATTENDANCE BREAKDOWN



Lead in Paint Community of Practice Discussion 3 Summary

- 1. Benefits and Challenges from Awareness Raising:** Participants mentioned increased consumer awareness, limiting of the risk associated with exposure to lead paint, and increased protection of human health and the environment as benefits from awareness raising. In addition, awareness raising in the past had been a key catalyst in the process of setting and passing lead paint legislation and regulation. Challenges included: a lack of momentum on awareness raising activities, resulting in poor progress towards legislation; poor compliance and regulation of existing legislation; and other challenges related to how to widen the reach of awareness raising activities. Government officials, NGOs, the consumer, industry and manufacturers, and SMEs were highlighted as important stakeholder targets of awareness raising.
- 2. Information Needed and Provided:** Participants expressed that the information was needed on current regulations, test methods, lead paints that still have a high lead content, non-compliance by stakeholders, alternatives available for lead in paint, and the health and environmental risks associated with a high lead content in paint. It was also expressed that having no data on lead paint in a country makes it difficult to get legislators and authorities to prioritise regulating lead in paint. Participants had provided information on existing legislation in their respective countries, as well as the Model Law and Guidance for Regulating Lead Paint and other information developed by the Lead Paint Alliance. In addition to this, participants stated that sharing examples of Lead Paint laws in other countries has helped in their country's progress towards a Lead Paint Law.
- 3. Planned Activities and Outcomes:** Participants mentioned the following activities planned: organising meetings between Government officials, NGOs and other crucial stakeholders to discuss lead paint legislation; radio and social media events that aim to raise awareness around the health and environmental impacts of lead paint; school programs focused on educating teachers, students and parents on lead in paint; events aimed at companies; webinars and workshops; and distribution of lead-safe paint to preschools in association with lead-safe paint producers. Activities were planned to achieve the following types of outcomes: raise awareness in specific stakeholders, especially those in remote areas or those needed to support a law; convince policymakers to draft, finalize, and enforce a standard or regulation; and empower industry and encourage them to stop using lead-based ingredients.

ANNEX

DETAILED SUMMARY OF DISCUSSION:

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THE DISCUSSION WAS STRUCTURED AROUND THREE QUESTIONS AND THE KEY DISCUSSION POINTS ARE PRESENTED UNDER EACH.

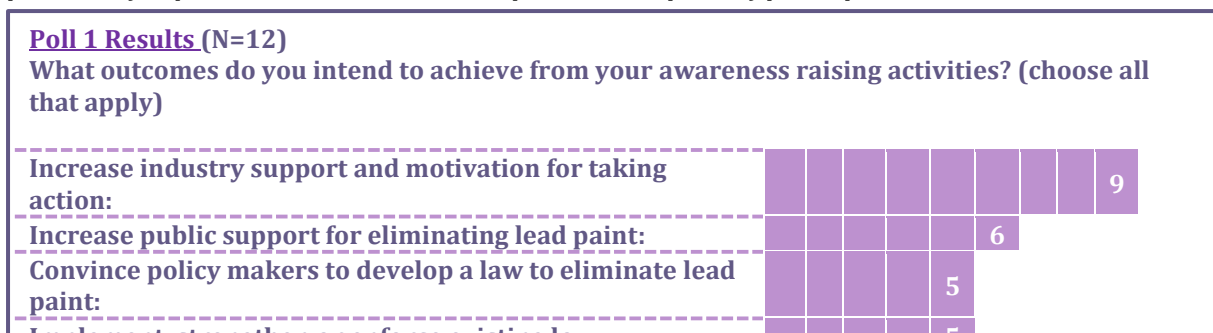
Inputs to the discussion from participants

Q1. What benefits and challenges have you seen from awareness raising about lead paint in your country so far? Which stakeholders have been the most important targets in your country to build support for a lead paint law, and why?

	Benefits	Challenges	Stakeholders
BANGLADESH (NGO)	- Consumer awareness and policy intervention process.	- Lack of proper regulatory framework and bureaucracy. [Note: Bangladesh passed a lead paint law in 2019.]	- Manufactures are the most important targets.
BENIN (NGO)	- Launched regulatory process for lead paints on Tuesday 8/09/2020.	- Support to keep on this process until the realization of the Law.	- Initiated by the Ministry of the Environment - Meeting for discussion with stakeholders such as NGOs - Madame Amanda (ABA-ROLI) participated live from Jordan.
CAMEROON (NGO)	- Limit the risk associated with the use of paints with high lead content. - Protect the health of the environment and humans, especially children.	- Compliance and effective implementation of 90ppm regulation. - Development of national capacity to monitor and prevent lead poisoning in children - Orientation of research on lead content in other children's items.	
COLOMBIA (NGOs)	- Calls attention to not letting up and continuing efforts.	- Programming of events is very infrequent. - This can affect attendance.	- Events must cover all types of population and sectors. - The final consumer and clients responsible for the purchase of paint should be given more information.
ECUADOR (NGO)	- Specific focus on awareness-raising issues. - Example: Events that we developed the previous year for the ILPPW 2019.	- Very little work has been done to raise awareness in the public about the use of lead in paint.	- Manufacturing companies, universities, NGOs and government institutions.
INDIA (NGO)	- Awareness campaigns reach a wider audience and push for a regulation. [Note: India passed a lead paint law in 2016.]	- Keeping momentum on the topic to promote effective compliance of the regulation.	
IPEN - Global (NGO)	- More people are made aware of the issue. - Allowing more people to speak about the issue of eliminating	- If there is no awareness raising, there is very little progress towards eliminating lead paint in a country.	- Key stakeholders from government and industry.

	<ul style="list-style-type: none"> lead paint (i.e., professionals, pediatricians, architects, consumer groups, etc.) - Widens reach of awareness raising and empowers more stakeholders to speak up on the issue. - Creating opportunities for discussion in communities, schools, legislative and technical fora, etc. 	<ul style="list-style-type: none"> - How to elevate the issue to a wider audience, making it an issue of national concern. - How to engage media to cover the issue. If there is low awareness on the issue, it may not get the necessary support from target stakeholders. 	
MADAGASCAR (Government)	<ul style="list-style-type: none"> - Key stakeholders and the public are beginning to understand the dangerousness of lead paints on health and the environment. - The information material to support advocacy or awareness raising on lead paint by Global Alliance to Eliminate Lead Paint is an effective tool of awareness raising campaigns. 	<ul style="list-style-type: none"> - Strengthen increased consumer awareness of health and environmental problems linked to lead exposure. - Information relating to lead paint is very poorly known. - No data exists so far. - Public does not have much information on the harmful effects of lead in paints. 	<ul style="list-style-type: none"> - Ministry in charge of Public Health. - Ministry in charge of Industry. - Ministry in charge of Labor. - Ministry in charge of Commerce. - Ministry in charge of Higher Education and Scientific Research represented by the National Center for Environmental Research - Madagascar Standards Bureau.
SERBIA (NGO)	<ul style="list-style-type: none"> - Adopted REACH legislation and there are no products containing lead on the market (except for industrial paints). - Awareness raising is mostly focused on the removal of old lead paint. 		<ul style="list-style-type: none"> - Most relevant stakeholders are NGOs, Ministries of Environment and Health as well as Institutes for Public Health (Batut Institute).
SRI LANKA (Government)	<ul style="list-style-type: none"> - Brought about a law controlling lead limits in paint. [Note: Sri Lanka passed a lead paint law in 2014] - Further research results strengthened this law. - By today every paint is supposed to be labelled lead safe. 		
UNEP (IGO)	<ul style="list-style-type: none"> - With the global paints and coatings market estimated to be valued at USD 223 billion in 2025 and growing at a Compound Annual Growth Rate of 6.5% in the period from 2019-0225, promoting the sustainable use and production of paint without added lead is of crucial importance. 		<ul style="list-style-type: none"> - Small and medium-sized enterprises are key stakeholders in this process.

Throughout the discussion, informal polls were conducted to help encourage discussion among the participants. They do not provide any representative data but rather provide a snapshot of participant views.



Q2. What information do your stakeholders need to understand to build support for a law? What information have you provided and how has it worked to engage stakeholders in your country?

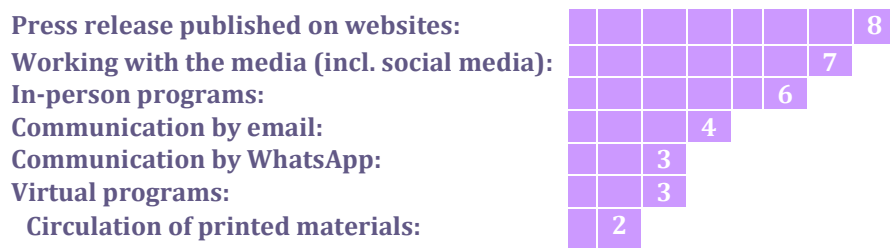
Country	Information needed	Information provided
BANGLADESH (NGO)		<ul style="list-style-type: none"> - Mandatory law of 90 ppm. - Invoked manufacturers and policy makers as well as consumer awareness.
CAMEROON (NGO)	<ul style="list-style-type: none"> - Producers, importers, and users of lead paints need information on current regulations. [Note: Cameroon passed a lead paint law in 2017.] - Information needed on the consequences of lead use on human and environmental health. - Information needed on alternatives, and actions taken to limit lead in paints. - Information needed on companies and paints that do not comply with the 90 ppm lead limit. 	
COLOMBIA (NGO)	<ul style="list-style-type: none"> - The regulatory issue involves several aspects that must be included both in the baseline of a country and in decision-making. [Note: Colombia passed a lead paint law in 2020 that provides the basis for future technical regulations for implementation.] - The 90 ppm limit should be supported for all types of paint and all vulnerable populations to avoid targeting only architectural paintings. - Availability of alternatives in the country and technical feasibility for the different types of paint. - Test methods, availability, and feasibility of implementation. 	
ECUADOR (NGO)		<ul style="list-style-type: none"> - Shared the Model Law and Guidance for Regulating Lead Paint. - This document helped in the final stage of discussion of the draft of the law "Regulation 061-Paints". [Note: Ecuador is revising existing lead paint standards.] - Shared information about the Lead Paint Alliance Frequently Asked Questions and other WHO resources.
INDIA (NGO)	<ul style="list-style-type: none"> - Need the information that the paints being produced/sold in the country are contaminated with Lead. - Need data on the health implications due to the presence of Lead in paints is important. 	<ul style="list-style-type: none"> - We provided all this information to our stakeholders which led to the formulation of regulation prior to which major leading industries adopted the voluntary standard of 90ppm.
IPEN (NGO)	<ul style="list-style-type: none"> - When there is no available data on lead in paint in a country, it is difficult to encourage legislators/authorities to draft a law - They seek basis/info as to the extent of the problem of lead in paint in their respective countries. 	<ul style="list-style-type: none"> - Examples of adopted laws in other countries (better if they are within the region) as well as the scope (all types of paints?) and basis for the limit (90 ppm) helped in faster adoption of a law. Industry inputs also help, i.e., alternative ingredients are widely available now.
MADAGASCAR (Government)		<ul style="list-style-type: none"> - In general, all information regarding to lead in paints including Guidance and Model Law for the regulation of lead paint has already been discussed and shared with key stakeholder in Madagascar.
SERBIA (NGO)	<ul style="list-style-type: none"> - Not applicable for Serbia, as there is Law (REACH legislation banning lead compounds import, use and trade). 	
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - I found it helped when researchers conducted spot testing of paint and revealed their results. - This was useful for promoting action to improve on the existing laws in South Africa. 	
SRI LANKA (Government)	<ul style="list-style-type: none"> - Levels of lead contamination in different paints was the most powerful tool in driving 	

authorities to go for regulated levels.

- It also attracted Paint companies to stand high with the record that their paint is uncontaminated.

Poll 4 Results (N=10):

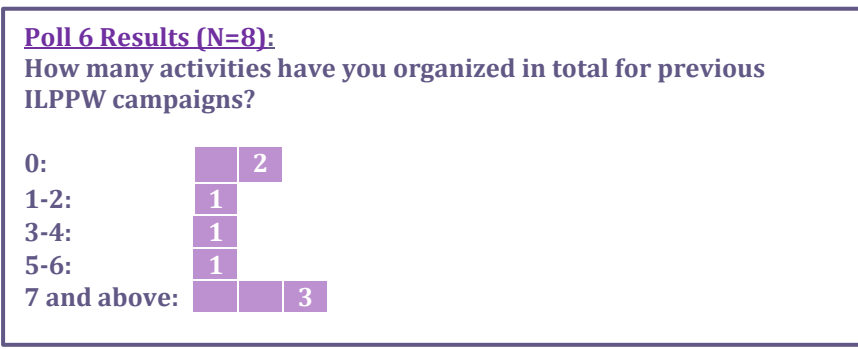
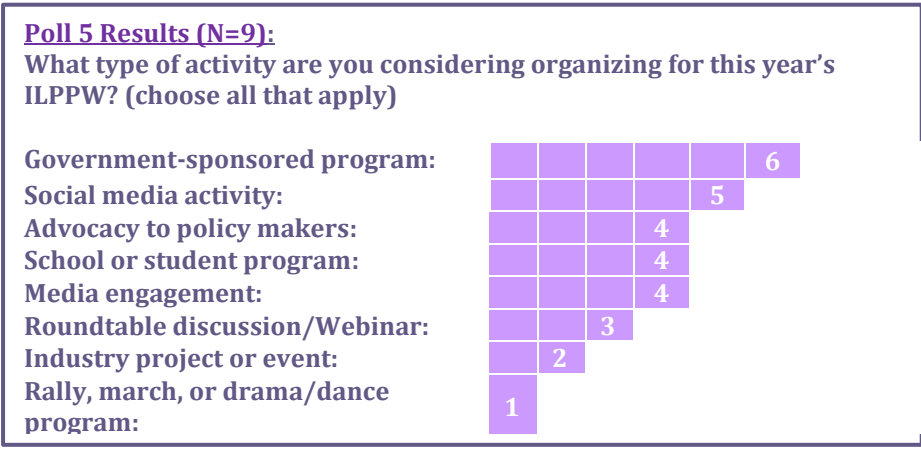
Choose all the communication methods and channels that are useful for engaging your primary audiences in advocacy or awareness-raising activities.



Q3. How do you plan to use, or could you use, awareness raising activities including the International Lead Poisoning Prevention Week (October 25-31) to build support for lead paint laws in your country? What outcomes could you aim to achieve through your awareness raising activities?

	Event planned	Outcome aimed to be achieved
BANGLADESH (NGO)	<ul style="list-style-type: none"> - Environment and Social Development Organisation has planned a policy meeting in collaboration with Department of Environment. - This would involve other government wings and manufactures. - Plans for a virtual media briefing and youth involvement on social media. 	<ul style="list-style-type: none"> - Raise awareness on lead in paint.
BENIN (NGO)	<ul style="list-style-type: none"> - 2019 ILPPW involved five activities and some social media work for the lead paint regulation and elimination. 	<ul style="list-style-type: none"> - Focus was sensitisation of student, paint companies, and government officials towards lead in paint.
CAMEROON (NGO)	<ul style="list-style-type: none"> - Jeunes Volontaires pour l'Environnement Cameroon plans: <ul style="list-style-type: none"> - Radio broadcasts in connection with the ILPPW - Send letters to the ministries in charge for the establishment of inter-ministerial monitoring bodies for the implementation and enforcement of regulations - Send warning letters to producers, importers of paints containing more than 90 ppm. 	<ul style="list-style-type: none"> - To enforce the regulation of September 2017 in Cameroon prohibiting the manufacture, import, marketing and use of any paint containing more than 90 ppm in Cameroon. - To raise awareness of the lead in paint issue.
COLOMBIA (NGO)	<ul style="list-style-type: none"> - Planning events aimed at companies and open public. - Webinars with information on health effects, case studies, alternative pigments, regulatory status and workshops. 	<ul style="list-style-type: none"> - Raise awareness on lead paint.
ECUADOR (NGO)	<ul style="list-style-type: none"> - Plan to carry out a joint activity with the NCPCs of Colombia and Peru for the ILPPW 2020. - Focus will be on providing information on the global status of countries that have a regulation that regulates lead content in paint, promoting the participation of alternative suppliers and provide information on the health impact of lead. - We will have the support of some members of the Lead Paint Alliance. 	<ul style="list-style-type: none"> - With these events we seek to encourage INEN so that it can finally approve the "Technical Regulation 061" that is still under review.

- IPEN (NGO)**
 - Heavy engagement with media (print, TV, radio, online) in our ILPPW activities.
 - Organizing such activities in collaboration with schools (students, teachers, and parents) provide more media mileage.
 - In 2019 ILPPWA, 38 IPEN POs from 34 countries conducted awareness raising activities. You can see examples of activities and relevant photos at: <https://ipen.org/projects/international-lead-poisoning-awareness-week-2019>.
 - MADAGASCAR (Government)**
 - Ministry of Environment and Sustainable Development, the Ministry of Public Health and the Grenner Mada Association will celebrate IPPLW on October 29-30, 2020 in a public primary school with playgrounds.
 - Sharing of awareness-raising materials related to lead paints using several animations will take place.
 - There will be an animation and debate in the local radio and social media.
 - SRI LANKA (Government)**
 - Conduct an event to give lead-safe paint to pre-schools in association with lead-safe paint producers
 - UNEP (IGO)**
 - Radio has a widest and broadest reach of communication especially in remote areas
 - WHO (IGO)**
 - 2019 ILPPW saw 89 events organized, held by 82 organizations in 57 countries globally
- Jointly organizing activities with relevant ministries or government agencies allow us to seek accountability/action from authorities after the event.
 - Jointly organizing with industry (paint manufacturers through donation of lead-safe paints; repainting of classroom facilities, hospitals, parks, and playgrounds) not only benefits communities of safer environments, but empowers the industry (engages them) to actively participate in awareness-raising activities and consultative technical meetings when drafting a law.
 - Inform staff and primary schoolchildren of the situation on lead poisoning.
 - Convince policy makers to start drafting a law to phase out lead paint.
 - Ensure draft lead paint law is supported by stakeholders, especially in industry.
 - Increase consumer awareness about the health and environmental issues from lead exposure.
 - Encourage industry to stop using lead-based ingredients in their paints.
 - These awareness activities increase the people's demand for lead-safe paints.
 - Inform parents and teachers about buying lead-safe paint.
 - Educate people living in remote areas.



Helpful resources:

- **Campaign website:**
<https://www.who.int/campaigns/international-lead-poisoning-prevention-week/2020>
 - **Campaign materials:**
<https://www.who.int/campaigns/international-lead-poisoning-prevention-week/2020/campaign-materials> and
<https://www.who.int/campaigns/international-lead-poisoning-prevention-week/2020/about>
 - **Register your event:**
<https://www.who.int/campaigns/international-lead-poisoning-prevention-week/2020/registration>
 - **Guidance on advocacy and awareness-raising (WHO):**
<https://www.who.int/publications/i/item/9789240011496>
 - **WHO report on ILPPW 2019 activities:**
<https://www.who.int/publications/i/item/9789240006676>
 - **IPEN report on ILPPW 2019 activities:**
<https://ipen.org/news/ipen-pos-join-2019-international-lead-poisoning-prevention-week-action>
-

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COMMUNITY OF PRACTICE ON LEAD IN PAINT

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 4 of 2020
 Discussion date: 10th November 2020

Discussion Digest 4

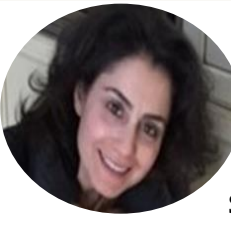
Topic of Discussion: Compliance and enforcement in a lead paint law

The fourth Lead in Paint Community of Practice (LiP CoP) discussion, presented by Amanda Rawls, ABA-ROLI, Negin Mostaghim, US EPA, and Evelyn Rivera-Ocasio, US EPA, reviewed three questions focusing on compliance and enforcement in a lead paint law. Developing effective compliance and enforcement systems is important to ensuring the success of laws. The purpose of enforcement is to provide incentive for the regulated community – those subject to requirements in the law -- to follow the law. To view the PowerPoint presentation of the discussion, click [here](#).

ABOUT THE PRESENTERS



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 assisted Ministries of Justice and Health, Law Reform and Land Commissions, to draft law and policy ranging from Whistleblower Protection and Land Rights laws to national policies on expanding human resources for health and integrating customary and statutory justice. She has worked mainly in sub-Saharan Africa.



Negin Mostaghim is an enforcement attorney in the Office of Civil Enforcement at the U.S. Environmental Protection Agency. She also advises attorneys on specific enforcement matters with particular emphasis on hazardous waste regulation. Previously, she has assisted with drafting country laws and has an LL.M. in International Environmental Law from the Washington College of Law.

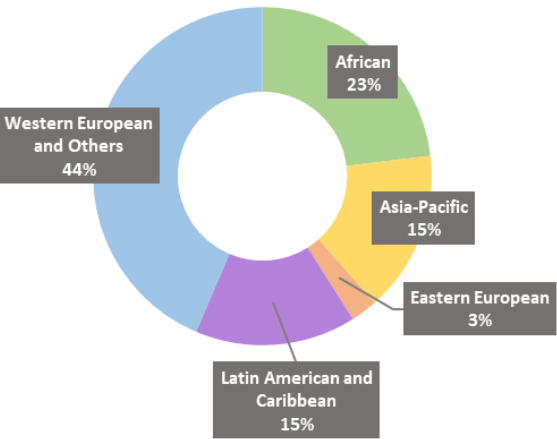


Evelyn Rivera-Ocasio has been working for the U.S Environmental Protection Agency since September 1998. First, as an enforcement officer and since 2013 as an Assistant Regional Counsel at the Office of Regional Counsel – Caribbean Programs. Evelyn has Bachelor of Science Degree in Chemical Engineering from the University of South Florida, a Juris Doctor from the University of Puerto Rico School of Law, and a Master of Laws Degree in Environmental Law from Vermont Law School.

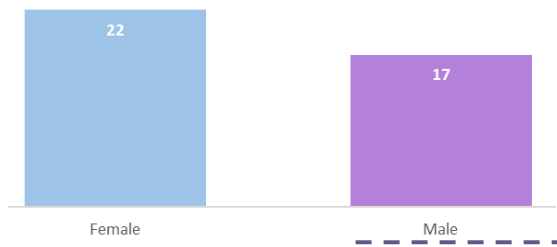
DISCUSSION 4 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION 4: 39

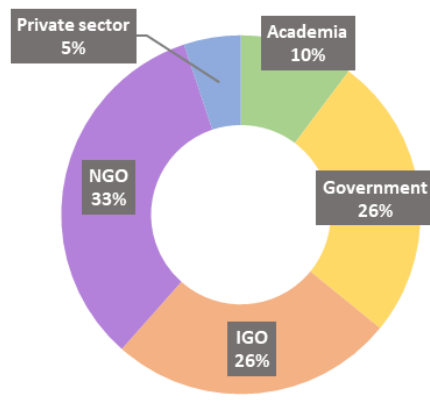
Regional representation



Gender representation



Sector representation



Key:
 IGO – Intergovernmental Organisation
 NGO – Non-governmental Organisation

Lead in Paint Community of Practice Discussion 4 Summary

1. For purposes of the LiP CoP Discussion, compliance and enforcement was considered to have three stages – **promoting compliance, documenting compliance and government enforcement** -- and the three discussions questions were organized around these three topics. These are key areas for national governments and the international community to focus on. It would be useful to have monitoring progress **indicators** for these.
2. **Promoting Compliance:** Promoting compliance helps ensure that the regulated community – those who must comply with the law - understands the requirements of the lead paint law. To promote compliance, government should provide the regulated community with useful and timely information to assist with key compliance requirements of the law. Participants noted the type of information needed by paint producers and importers, including information about the impacts of lead on human health and finding and accessing alternatives to lead compounds in paint. Challenges identified during the discussion included the need to identify laboratory capacity for testing in order to document compliance with a 90 ppm limit, and the need for government outreach to the paint industry and importers to promote compliance. Suggested solutions to the challenges included encouraging use of existing labs in other countries and government partnering with civil society to promote compliance and lessen some of the compliance assistance burden on government.
3. **Documenting Compliance:** Documenting compliance is crucial for an effective enforcement and compliance program. To be effective, a lead paint law should establish mechanisms for the regulated community (paint producer and importers) to document compliance. Examples of effective ways to document compliance provided by the participants included a Declaration of Conformity by producers and importers based on paint testing, registration of users of paint ingredients containing lead compounds in a government database, and lead safe paint certification by a third-party.
4. **Government Enforcement:** Government enforcement includes efforts by the government to verify compliance and to take action on violations of the lead paint law. Effective enforcement is essential because it provides incentives for compliance and helps eliminate unfair advantage for those who do not comply. Participants discussed ways the government can verify if paint producers and importers are in compliance, such as testing paint of colors most likely to contain lead, checking documentation, inspections and spot testing. Participants also shared government actions in response to violations, including informing the public of violations, recalling products, fines and administrative sanctions.

ANNEX

DETAILED SUMMARY OF DISCUSSION 4:

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THE DISCUSSION WAS STRUCTURED AROUND THREE QUESTIONS AND THE KEY DISCUSSION INPUTS FROM PARTICIPANTS ARE PRESENTED UNDER EACH:

Q1. In your country, what information do paint producers and importers need to be able to comply with a new lead paint law? What challenges have arisen or might arise in providing this information?

Information needed by the regulated community to comply	Challenges to providing information
COLOMBIA (NGOs)	<ul style="list-style-type: none"> - Challenge related to demonstrating that the paint is below the limit of 90 ppm. - There are too many different types of paint formulations and the laboratory testing is expensive.
IRAN (Academia)	<ul style="list-style-type: none"> - Decades of academic research has been done on lead in paint and lead poisoning. - Global Report on the Status of Legal Limits on Lead in Paint by UNEP 2016 in Iran found no binding legal limit on Lead in Paint.
ISRAEL (Government)	<ul style="list-style-type: none"> - Data on alternatives is needed. - Lead in industrial paint is a challenge. - It is difficult to share lead paint law information with importers. - We have engagement with industry stakeholders, but less engagement with paint importers. - Concerns that compliance will be less with importers, as they have not been engaged with them as fully.
MADAGASCAR (Government)	<ul style="list-style-type: none"> - Necessary information on the consequences and risk of the use of lead on the environment and human health, especially for people working in the manufacture of lead paints, is needed. - Necessary information on alternatives solution to replace or limit lead in paints is needed. - Producers, importers, and especially users of lead paint need information on current regulations. - It is essential to conduct a test study to see the lead content in paints in the country. - Convincing producers and importers of leaded paint to comply with a new lead paint law.
MEXICO (NGO)	<ul style="list-style-type: none"> - Industry suggest reviewing of the safety sheets of the raw materials they use in their formulations. - No certified labs in México to do the testing. - Another concern is the cost of testing as many companies are small sized.
SERBIA (NGO)	<ul style="list-style-type: none"> - The EU approach (REACH) has been used for several years already. - Under REACH, there is no limit of lead in paints, but rather prohibition of production, trade and use of lead-containing compounds as chemicals of high concern. - After adoption of the regulation, the - Huge number of different products is a challenge for testing. - Each different colour/shade is a different product. - This should be considered. - [Note: The Alliance suggests utilizing "component part testing;" the testing of each

Government organized roundtables and seminars for producers.

- Civil society organizations were involved in informing the industry about the law.
- There is obligation of industry to have certified chemical advisers who help companies to comply.

ingredient rather than for each finished paint product (for example, each variant of color or shine). See Frequently Asked Question # 34 at <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint/faq>]

**US EPA
(Lead Paint
Alliance
Advisory
Council Chair)**

- Each country does not need to have its own laboratory for it to base compliance on accredited, third-party testing.
- Current lack of in-country laboratory capacity need not be an impediment to implementation of a lead paint law, as manufacturers and importers can still comply with the law by sending paint samples for testing to accredited, third-party laboratories in other countries or relying on testing provided by the raw material suppliers.
- Countries can also build domestic capacity for paint testing by encouraging laboratories to acquire the necessary equipment, expertise and accreditation for testing lead paint.

Throughout the discussion, informal polls were conducted to help encourage discussion among the participants. They do not provide any representative data but rather provide a snapshot of participant views.

Poll 1 Results (N=7)

What actions has your government taken on compliance and enforcement? (more than one response could be selected)

Collaborate with NGOs and industry associations to share information:

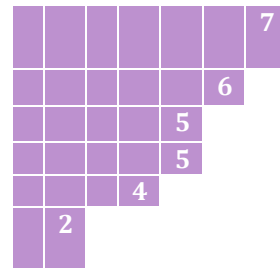
Inform regulated community of requirements:

Engage regulated community in drafting process:

Provide testing information:

Answer compliance questions of regulated community:

On-site testing of paints from company's manufacturing plants using XRF:



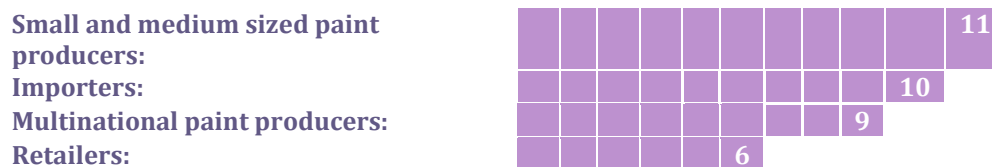
Q2. In your country, what are some efficient and effective ways (e.g., registration, declaration of conformity, laboratory testing by third-party, self-reporting, etc.) for paint producers and importers to document compliance?

COLOMBIA (NGO)	<ul style="list-style-type: none"> - This issue is still under discussion and no strategy has been defined yet.
ECUADOR (NGO)	<ul style="list-style-type: none"> - The project of law that is still pending approval (Technical Regulation 061 Paints) promotes as control mechanism, the declaration of conformity and the conduct of analysis by a third-party laboratory. - This last point is of great concern to paint manufacturers because there is currently only one accredited laboratory in Ecuador to perform the lead in paint analysis.
ISRAEL (Government)	<ul style="list-style-type: none"> - Ministry of Economy promotes declaration of conformity as means for demonstrating compliance. - Ministry of Health prefers (periodic) laboratory testing by third party labs. - Perhaps working with industry and importers on a scheme that would include both self-declaration and periodic testing would be a good approach at gaining "buy-in" and building trust. - Regulators prefer the approach that requires testing but the burden on industry and importers needs to be considered. - We have had cases with other products (not paints) where supplier report has been unreliable. - A potential problem with self-reporting is that importers do not always know what they are importing, they are relying on reporting of producer or supplier. - Perhaps with industry self-reporting is more reliable because industry knows exactly what they are producing.
MADAGASCAR (Government)	<ul style="list-style-type: none"> - To be efficient and effective it is necessary to have a regulatory framework to limit lead in paints with mechanisms to allow paint producers and importers to prove that they comply with the legal requirements of the law.
MEXICO (NGO)	<ul style="list-style-type: none"> - "Lead safe paint certification" by a third party could be included/considered in legislation as compliance. - Perhaps a combination between self-declaration and regulatory testing with high fines would work. - Mexican legislation calls for declaration of conformity, however there is no explanation about how this declaration should work.
PHILIPPINES (NGO)	<ul style="list-style-type: none"> - Importers and users of lead compounds need to register with a government database. - According to the Environment Department, as of 2020, no more companies under the paint industry sector are importing lead compounds. - The two biggest paint manufacturers in the Philippines, as well as a medium-sized company, have third-party certification of their paint brands, including industrial paint brands. - These brands comprise of about 85-90% of the market share. - This certification is submitted to the Environment Department as additional documentation to show compliance with the law.
SERBIA (NGO)	<ul style="list-style-type: none"> - If there is an exception (legal) to use lead in paints, then the producer or distributor must label the product as "for professional use only". - There are labs that do the testing if the inspection suspects that there may be non-compliance with the law. - Therefore, the approach is self-declaration, combined with certified lab testing as required by the inspection.
SWEDEN (Government)	<ul style="list-style-type: none"> - A legal requirement for a supplier to classify and give the components of a mixture (at least hazardous ones) to the receiver for example under GHS will make it possible to enforce throughout the supply chain. - Testing can be necessary, but just gives a snapshot. - The GHS (CLP-regulation in the EU) requires the supplier to classify and give composition of mixtures to receiver (when hazardous), the producer of the paint will then have legal documents (safety data sheets) from their suppliers (if they are in the EU) that show whether the pigment or other chemical contains lead. - Inspectors can control the safety data sheets early in the supply chain (importer, manufacturer) or further down e.g. paint retailer.
US EPA (Lead Paint Alliance Advisory Council Chair)	<ul style="list-style-type: none"> - Some form of self-implementing regulation may be helpful to save resources. - EU REACH approach, which regulates the paint ingredients, and can be effective. - Another approach is to set a low lead limit in paint; then the government does not need to conduct risk assessments for each chemical. - Lead Paint Alliance website has some details on testing schemes. See FAQs on component testing option to help reduce the amount of testing needed and the <i>Model Law and Guidance for Regulating Lead Paint</i> (Model Law) discussion of testing. - Lead Paint Alliance FAQ link: https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint/faq - Providing self-implementing measures for industry to take to relieve the burden on the government - the declaration of conformity is, in a way, a self-implementing measure, where the burden is on industry to demonstrate compliance and present its documentation. This is a less resource intensive means to demonstrate compliance than registration.

- The Model Law contemplates spot testing by government as a back up to ensure reliability of testing by companies (paint manufacturers and importers).
- Link to Model Law:
https://wedocs.unep.org/bitstream/handle/20.500.11822/22417/Model_Law_Guidance_%20Lead_Paint.pdf?sequence=7
- Model Law is also available in other U.N. languages at
<https://www.unenvironment.org/resources/publication/model-law-and-guidance-regulating-lead-paint>

Poll 2 Results (N=11):

Whom does your regulated community include? (more than one response could be selected)



Q3. In your country what are the ways (e.g., document review, site inspection, spot testing) government could verify if paint producers and importers are in compliance? What government actions could be used in response to violations?

	Ways to verify compliance	Response to violations
BENIN (NGO)	- Government organized activities for regulating lead paint.	
COLOMBIA (NGO)	- Government should concentrate on those which are most likely to have lead compounds (i.e., colour yellow, red, orange, and green).	
IRAN (Academia)	- Government information should be based on academic review and analysis for lead content. - There are plenty of academic studies on different lead poisonings which should be used.	
ISRAEL (Government)		- Government action in case of violations include informing the public - this is a form of "shaming" of the company. - This is combined with recall of products. - Perhaps if countries have limited capacity for testing - response needs to be harsh in case of noncompliance. - This provides a major incentive to be compliant even if chance of "getting caught" is low.
MADAGASCAR (Government)	- Within the framework of this project multi-sectorial stakeholders will work for the verification of compliance such as: <ul style="list-style-type: none"> - Customs officers will ensure inspection of ports of entry for compliance documentation to ensure that it is complete and accurate. - Industry inspectors will provide inspections of production sites and facilities. - The (CNRE) Centre National de Recherche sur l'Environnement will conduct the on-site tests and compare the results with the documentation provided. - Trade inspectors will conduct inspections, distribution, and sales points 	- In the case of a violation the government may proceed: <ul style="list-style-type: none"> - Verbal reminder. - Administrative sanctions. - Fines paid by the company or the person in charge. - Seizure of the product. - Prohibition of production or importation of paint.

	<ul style="list-style-type: none"> to ensure compliance procedures are followed - Labour inspectors ensure compliance and the equipment and health of workers. - The OPJs of the environment (Judicial Police Officer) will ensure the coordination of these inspections with the stakeholders concerned. 	
MEXICO (NGO)	<ul style="list-style-type: none"> - Due to economic and personnel capacity constraints, the only possible way for government to verify compliance would be document review. - Spot testing by non-involved parties is very useful too. 	<ul style="list-style-type: none"> - In Mexico the standards which regulate lead in paint have no violation sanctions.
PHILIPPINES (NGO)	<ul style="list-style-type: none"> - The Chemical Control Order (CCO) for Lead and Lead Compounds mandate regional offices of the Environmental Management Bureau (the agency responsible for drafting and implementing the law) monitor company compliance based on submitted self-monitoring reports <ul style="list-style-type: none"> - The EcoWaste Coalition/IPEN in the Philippines conduct studies on lead content in paints. In July 2020, they published a study on Lead in Spray Paints in the Philippines: https://ipen.org/documents/lead-spray-paints-consumer-use-philippines. - After sharing the study with relevant government agencies, the Food and Drug Administration (FDA) of the Philippines on September 2020 released a Public Health Advisory against the purchase and use of leaded spray paints based on the EcoWaste/IPEN study. 	<ul style="list-style-type: none"> - In cases of complaints of non-compliance, sampling and testing (on-site/spot and lab) are undertaken to confirm that lead concentrations of paints do not exceed 90 ppm. - Any violations of the requirements set under the Philippine CCO subject persons/companies to applicable administrative and criminal sanctions provided under existing laws.
SERBIA (NGO)	<ul style="list-style-type: none"> - Document review - Spot testing - Random inspections. - Some international companies have their own auditing schemes that could help to eliminate hazardous/prohibited raw materials. 	<ul style="list-style-type: none"> - As the sanctions are concerned, they range from mild such as monetary fine, through seizure of goods to revoking license to produce/distribute paints.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - Spot testing by academics who then publish the findings has been useful. - Highlighting which companies are not complying. 	
SOUTH AFRICA (Private sector)	<ul style="list-style-type: none"> - Spot testing is a very quick way to gauge the level of compliance within the industry. 	
SWEDEN (Government)		<ul style="list-style-type: none"> - Recall of product (if enforced) and publication of result (shaming) is probably as effective or more than fines (unless those are substantial). - For selling a product with prohibited substances in it, the fine in Sweden would be set by the prosecutor (or the court if the company does not accept the prosecutor's decision) based on the turn-over of the company.
US EPA (Lead Paint Alliance Advisory Council Chair)	<ul style="list-style-type: none"> - Component testing is an option as well. - If testing shows the components are without lead, testing of the final mixture would not be necessary. - The Model Law approach is that compliance can be achieved by showing the components were 	

