



## International Paint & Printing Ink Council

May 1, 2009

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Executive Secretary  
Intergovernmental Forum on Chemical Safety  
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and

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Dear Ms. Stober and Doa:

I am writing on behalf of the International Paint and Printing Ink Council, Inc. (IPPIC), an association representing the global interests of the paint and printing ink industries, with specific emphasis on management of the industry's environmental, health and safety impacts. IPPIC was formed in 1992 and is comprised of official members from Europe, Asia-Pacific, and the Americas (see attached network chart). IPPIC has official consultative (NGO) status with the United Nations Economic and Social Council (ECOSOC), the International Maritime Organization (IMO), and is active in a number of UN and UN-related agencies addressing critical aspects of the UN's missions.

At its recent annual meeting (March 2009), IPPIC had an opportunity to discuss the UN's proposal to form a "global partnership" to address environmental lead concerns arising from the continued use of lead in paints. This partnership, as we understand it, would be established under the auspices of the International Conference on Chemicals Management (ICCM), and have an overarching goal to prevent children's exposure to lead via paints containing lead and to minimize occupational exposures

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to lead in paint. The objective<sup>1</sup> of the partnership would be to *“facilitate a phase-out of the manufacturing and sale of paints containing lead and the eventual elimination of risks from paint containing lead which contribute to childhood lead exposure”*.

In 2008, IPPIC adopted a resolution, which is aligned with this recent UN initiative. Specifically, the resolution states:

**“IPPIC supports the long-standing effectiveness of lead-use restrictions that are already in place in certain jurisdictions and recommends their widespread adoption by authorities not currently regulating the use of lead in paint and printing ink.**

**Such restrictions may be accomplished through specific legislation or regulation, formal voluntary agreements, or by other means that ensure widespread and verifiable compliance.”**

Consistent with this resolution and our other work on UN initiatives, IPPIC is prepared to discuss how we could be of assistance on the work plan including:

- Information exchange on lead levels in paints in various countries;
- Information exchange on national, provincial, state, and local regulations and legislation on lead concentrations in paints allowed in various countries;
- Information exchange on labeling and certification systems on the presence and concentrations of lead in paint;
- Discussing and providing technical assistance on steps that can be taken to phase out lead from paints and surface coatings;
- Developing guidelines for establishing national standards;
- Providing international support to developing countries by further elaboration of methods to enact comprehensive laws to phase out lead paint uses which contribute to childhood exposure;
- Sharing knowledge on the availability of substitutes to replace lead compounds in paints;
- Assessing the feasibility of the voluntarily phase-out of the production of lead paints in cooperation with business and industry including on a (sub)regional level;
- Information exchange on methods to make housing and other buildings with lead paint safe for occupancy by children and pregnant women;
- Information exchange on suggestions for warning labels on new cans of paint alerting users to the health risks that could result if the surfaces being prepared for repainting contain lead paints;
- Discussion on steps to reach renovators, painters and other professionals on how to minimize children’s exposure to lead from lead paint; and
- Information exchange on promoting general public awareness on the hazards of lead paint.

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<sup>1</sup> From <http://www.saicm.org/documents>

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IPPIC believes that an agreed upon definition of lead paint should be established in order to focus activities on uses that truly contribute to the health risks of concern. To this end, we respectfully suggest the following definition which is consistent with current industry trade practice:

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*“The term ‘lead paint’ includes paints, varnishes, lacquers, stains, enamels, glazes, primers or coatings used for any purposes where lead is intentionally added to achieve a defined lead concentration expressed as a percentage of the total non-volatile portion of the product or in the weight of the dried paint film.”*

This definition would not encompass lead in paint arising from residual (i.e. trace contaminant) levels found in crustal-derived raw materials, but does not preclude the partnership from identifying levels of lead in paint that should be considered a health risk, as has been done in many countries.

Should the UN agencies developing this partnership have an interest in further discussing how IPPIC could assist in this matter please contact the IPPIC Secretariat.

Thank you for your consideration of these comments.

Sincerely,

Stephen R. Sides  
Secretariat  
International Paint and Printing Ink council, Inc. (IPPIC)