Global Alliance to Eliminate Lead Paint



ACTION PLAN for 2021-2023

PREAMBLE

This three-year Action Plan facilitates implementation of the Business Plan (and its Addendum) of the Global Alliance to Eliminate Lead Paint (Lead Paint Alliance) by providing suggested activities to effectively address four key action areas. The Action Plan is intended to encourage and support priority activities from 2021 to 2023 by Alliance partners and other stakeholders, as resources allow, that will help move toward the goals and objectives of the Alliance.

The primary goal of the Alliance is to prevent children's exposure to paints containing lead and to minimize occupational exposures to lead paint. Its broad objective is to achieve the phaseout of the manufacture, import and sale of paints containing lead and to eventually eliminate the risks that such paints pose. The Alliance is committed to efforts that support primary prevention, seeking to reduce or eliminate the conditions that give rise to environmental lead exposure before such exposures can occur.

In 2009, the second International Conference on Chemicals Management (ICCM2) under the Strategic Approach for International Chemicals Management (SAICM) policy framework endorsed a global partnership to promote the phasing out of lead paint and invited the United Nations Environment Programme (UNEP) and the World Health Organisation (WHO) to serve as the joint Secretariat for this partnership. The key priority of the Lead Paint Alliance is to promote the establishment of lead paint laws in all countries.

The Lead Paint Alliance Action Plans¹ are developed by UNEP and WHO in consultation with the Lead Paint Alliance Advisory Council. The Action Plan is revised every two to three years and identifies key priority action areas and concrete activities to support the goals and objectives of the Alliance outlined in the business plan. It helps all actors to be committed to their role in achieving the goals and objectives by providing a framework that groups the actions by Action Area and sector. All activities are however subject to the availability of resources.

The Action Plan for 2021–23 builds on the priorities in previous two-year Action Plans. It highlights the need for near-term efforts by national governments around the world to achieve

¹ For prior Action Plans, visit https://www.unep.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/global-alliance-eliminate-lead-paint-1

the phase-out of the manufacture, import and sale of paints containing lead. New laws and regulations should establish legally binding and enforceable limits on the lead content of these paints, by either eliminating lead additives or severely limiting the total amount of lead content. In countries where legal limits are not currently in place, such actions will help prevent new exposures to lead from paint, especially for children in homes and schools.

ACTION AREAS FOR 2021–2023

During 2021, 2022 and 2023, the Alliance will focus on four key action areas, which are also reflected in the Alliance Business Plan Addendum:

- 1. Encourage and support governments in countries where legal limits are not currently in place to establish laws, and encourage all countries to enforce and strengthen national legal limits on lead in paints, to achieve the phase-out of the manufacture, import and sale of paints containing lead.
- 2. Encourage industry activities to voluntarily stop the manufacture, import and sale of lead paints.
- 3. Increase awareness of the need to prevent and address the health and environmental risks posed by lead paint, including but not limited to helping prompt actions by governments and manufacturers to stop the production, import and sale of lead paints.
- 4. Engage with and encourage Alliance partners to fully realize the goals and objectives of the Alliance.

ACTIVITIES FROM 2021–2023

The following pages include specific project information plus suggestions and ideas for potential activities.

Activities under each Action Area are grouped by the following categories, as relevant:

- UNEP, WHO and Advisory Council Members;
- Governments;
- Inter-governmental organizations,
- Non-governmental environmental and health organizations (NGOs);
- Legal community; and
- Industry.

Partners in the Alliance are encouraged to consider the activities listed in this Action Plan and inform UNEP, WHO and/or the Advisory Council members of any activities planned for 2021 to 2023. The Alliance looks forward to collaborating with all partners, Advisory Council members,

governments, inter-governmental organizations, NGOs, the legal community and industry to implement the activities in this plan in 2021-2023.

ACTION AREA 1: ACTIVITIES TO ENCOURAGE AND SUPPORT GOVERNMENTS IN COUNTRIES WHERE LEGAL LIMITS ARE NOT CURRENTLY IN PLACE TO ESTABLISH LAWS, AND ENCOURAGE ALL COUNTRIES TO ENFORCE AND STRENGTHEN NATIONAL LEGAL LIMITS ON LEAD IN PAINT

UNEP, WHO AND ADVISORY COUNCIL MEMBERS

- Develop and disseminate **global tools** to facilitate development of national legal limits on lead in paints and encourage their adoption.
 - Model Law and Guidance for Regulating Lead Paint: The Lead Paint Alliance "Model Law and Guidance for Regulating Lead Paint" or "Model Law" is available in all UN languages for use by governments in establishing national lead paint laws.2 This guidance provides background information and model legal language for use by countries interested in drafting new lead paint laws and those interested in strengthening their existing laws.
 - Regulatory Toolkit: The Toolkit includes health and environmental impacts from lead, how to measure lead in blood and paint, and alternatives to lead in paint. It is being updated and will be available in 2021, incorporating industry case studies as well as the latest information needed by governments to establish and implement a national program to limit lead in paint. It will be promoted and accessible to governments and other stakeholders at workshops and other appropriate venues for use in establishing national legal limits on lead paint.
 - Upon request, and subject to availability of resources, webinars or workshops should be conducted for governments, industry and other stakeholders to provide information and tools to promote and support the elimination of lead paint. Where necessary, these will encourage countries and regional organizations to develop national or regional working groups as a critical step toward establishing national lead paint laws.
 - Additional tools, such as the recently-developed <u>Frequently Asked Questions</u> (FAQs), <u>Steps toward Laws fact sheet</u>, <u>Awareness Raising Guide</u>, and the <u>Policy</u> and <u>Technical</u> <u>briefs on</u> global elimination of lead paint: why and how countries should take action, Brief technical guides to analytical methods for measuring lead in <u>paint</u> and <u>blood</u> will

² As used herein, the term "laws" means legal mechanisms that establish a binding, enforceable limit on lead in paint with penalties for non-compliance. For example, "laws" can include legislation, regulations, ordinances or mandatory standards, depending on a country's legal framework.

also be disseminated and used to support workshops and national outreach.

- **Develop regional approaches and work with individual governments** to encourage or facilitate progress on establishing national legal limits
 - Plan regional projects and activities to engage multiple governments.
 - Encourage collaborations that include *sub-regional and regional* alliances of a broad range of key stakeholders such as existing local organizations, national or regional centres, regional offices, or economic cooperation organizations, e.g. CARICOM, Asia-Pacific Economic Cooperation (APEC), Economic Community of West African States (ECOWAS), the Eurasian Economic Community, Mercado Comun del Cono Sur (Southern Cone Common Market or MERCOSUR) Secretariat to support the work of national governments to establish legal limits on lead in paint.
 - Develop plans for how to move forward within the framework of the above collaborations.
 - Identify and work with government "champions" for regional efforts in sharing experiences in establishing national legal limits on lead in paints and to promote action across a particular region.
 - Encourage the development of regional project proposals to facilitate sourcing of funds and other technical assistance and encourage inclusive participation
 - Members of the Advisory Council can play a leading role at the regional level regarding workshops and follow-up activities planned for the regions.
 - Share approaches and lessons learned from regional and sub-regional efforts with UNEP and WHO regional offices and other regional contacts.
 - Subject to the availability of resources, conduct at least one **regional/sub-regional workshop** for stakeholders in countries in specific regions or sub-regions identified as priorities for the Alliance in 2021 and 2022. Less-cost options such as webinars or online workshops will be considered.
 - Collaboration with UNEP and WHO regional offices and other appropriate partners to facilitate such workshops.
 - Follow up to workshops will include country-specific national outreach, such as national workshops, or legal assistance such as drafting of laws.
 - **Reach out to governments without lead paint laws** to encourage and support them in establishing a law.
 - For those already working on legal limits, engagement includes learning about their progress, identifying any barriers, and providing technical assistance as appropriate.
 - Use any lessons learned in working with countries to inform and develop existing and new assistance tools.
 - Promote and participate in national meetings or workshops to contribute to the

development of a lead paint law.

- Encourage drafting of legally binding laws, regulations, standards and/or procedures to control the manufacture, import and sale of lead paint.
- Encourage establishment of *national* multi-stakeholder working groups to assist governments in drafting and establishing national limits on lead paint, and awareness raising.
 - The recommended target groups include: government officials; health, environment, industry, standards, trade, and other relevant sector representatives; representatives of the private sector; public interest organizations; worker organizations, trade unions; the legal community among others.
- Encourage governments with lead paint laws to ensure development of relevant supplementary regulations to **support implementation** of the lead paint law, which could include occupational exposure, monitoring and enforcement of paint manufacturing industry for compliance, government procurement practices that promote paint without added lead, etc., as appropriate.
- Countries with voluntary or less-protective standards, should be encouraged to establish the legal limit of 90 ppm total lead and increase the scope of the law to include all types of paints, including industrial paints.
- The Alliance Secretariat and the Advisory Council members can help raise awareness of lead paint issues in countries and can provide legal assistance to national governments drafting legal limits.
- Additional legal expertise, particularly national legal expertise in the relevant countries, should be mobilized where feasible to help countries adapt the Model Law provisions to their circumstances and legal systems, as needed.
- Use opportunities of **bi-lateral**, **regional and international meetings and events to reach out to governments** that are not currently working on legal limits to encourage them to do so.
- Encourage Member States to conduct lead paint phase-out in activities to support implementation of WHO's Roadmap to enhance health sector engagement in the Strategic Approach to International Chemicals Management (SAICM) towards the 2020 goal and beyond and to periodically report on progress to the World Health Assembly
- Through a globally coordinated approach, the Project Executing Partners WHO, the US Environmental Protection Agency (US EPA), the World Coatings Council (WCC), the International Pollutants Elimination Network (IPEN), the American Bar Association Rule of Law Initiative (ABA-ROLI), the Secretariat of the ECOWAS, and National Cleaner Production Centres (NCPCs) of the SAICM GEF Project "Global best practices on

emerging chemical issues of concern under SAICM; Component 1: Promoting regulatory and voluntary action by government and industry to phase out lead in paint" will coordinate to carry out the project. The project will accelerate the adoption of legal limits to lead in paint in at least 40 countries by December 2021 by providing legal and awareness raising support.

GOVERNMENTS

- Governments without legal limits on lead in paint should **establish and implement such limits, building on the Model Law** developed by UNEP in consultation with WHO, US EPA and other Alliance Partners.
- Governments with legal limits should take all necessary measures to **ensure full compliance.**
 - Governments in countries where existing regulations or legal limits on lead in paint exist but are not protective of public health are encouraged to strengthen these regulations.
- In addition, governments with legal limits can:
 - Serve as government "champions" to encourage other governments to take action, especially for regional efforts and activities.
 - Share their experiences with passing legislation and implementing programs on lead paint, through regional or national workshops or other means.
 - Publish their experiences and information to help other countries in the development of lead paint laws.
- Governments establishing legal limits should:
 - Ensure that the regulatory framework includes not only standards but other policies, such as set timelines to comply with the legal limit.
 - Seek to solicit a workable commitment from paint manufacturers and suppliers by establishing a timeline for phasing out lead in paint for ease of implementation and enforcement of the regulatory standards.

NON-GOVERNMENTAL ENVIRONMENTAL AND HEALTH ORGANIZATIONS (NGOs)

Non-governmental environmental and health organizations can help countries achieve legal limits by taking these actions:

- Engage with governments to support the development and implementation of legal limits on lead in paint.
- Engage with national industry, including small and medium enterprises, to encourage reformulation of lead paint and support for lead paint laws.

- Continue to conduct paint sampling studies in countries without legal limits in order to raise awareness and support for action to develop legal limits and, in countries where legal limits have been established, to help evaluate their effectiveness.
- Provide information to policy makers, parents and others interested in child health on the dangers of lead paint and how to prevent lead poisoning and engage with other stakeholders as relevant, including health professionals, consumer safety organizations, workers organizations, trade unions and others.

LEGAL COMMUNITY

The legal community, which includes legal professional organizations and law schools, can:

- Join efforts of the international community, governments, industry, and nongovernmental organizations to promote the phase-out of lead paint.
- Urge lawyers, law firms, bar associations, and other professional and non-profit organizations to support adoption and implementation of laws to phase out and eliminate lead paint through pro bono support, educational initiatives, and other appropriate means.
- Build an international network of legal experts to help with development and implementation of lead paint laws.

INDUSTRY

• Industry should engage with governments and civil society to support the development and implementation of legal limits on lead in paint.

ACTION AREA 2: ACTIVITIES TO VOLUNTARILY STOP MANUFACTURE, IMPORT AND SALE OF LEAD PAINT

UNEP, WHO AND ADVISORY COUNCIL MEMBERS

UNEP, WHO and Lead Paint Alliance Advisory Council Members can work with industry to voluntarily stop manufacture. Import and sale of lead paint, through these actions:

- Engage with suppliers of paint raw materials to explore opportunities of supply chain interventions facilitating lead paint elimination nationally, regionally and globally. (WCC, EPA, UNEP, WHO, IPEN)
 - Involve more alternative raw material suppliers, potential lead "user groups" and "technical societies" as a way of spreading awareness. (WCC)
- Engage ISO Technical Committee 35 (Paints and Varnishes) to convey alternatives to lead use among their membership. (WCC)

- Encourage appropriate organizations and companies to provide information to consumers on paints that do not contain added lead. (IPEN)
- Encourage the delivery of technical support for SMEs (small- and medium-sized enterprises), including in testing of paints in factories and on the market in order to demonstrate their commitment to comply.
- Build on existing efforts to engage the paint manufacturers, including SMEs, and the lead pigment industry in a productive way to encourage them to voluntarily stop the manufacture and sale of lead paints, especially for residential and decorative paints containing lead additives in countries where legal limits are not currently in place.
- Work through the UNEP SAICM GEF Project Lead Paint Component to address technical barriers faced by SMEs.
 - This project focuses on seven countries with SMEs producing lead paint: Jordan, Ecuador, Indonesia, Peru, Colombia, China, and Nigeria. In Ecuador, Peru, Colombia, China and Jordan the project works through National Cleaner Production Centres (NCPCs) to help SMEs phase out lead in paint. In Nigeria and Indonesia, the project works through IPEN partner organizations, SraDev and Balifokus, respectively.
 - Planned activities include SME guidance on reformulation (using alternatives) to be finalized by NCPCs based on existing guidance from IPEN and SME reformulation pilot demonstrations.
- Collaborate with the labour sector, including the International Labour Organization (ILO), other relevant labour authorities, and research organizations working on occupational health and safety.
- Encourage dissemination of the Lead Paint Reformulation Technical Guidelines to SMEs and others to promote lead paint reformulation.

INDUSTRY

To address the dangers of lead in paint and prepare for new legal limits, industry can:

- Voluntarily stop the manufacture, import and sale of lead paint in countries where legal limits are not yet in place, and show commitment to comply with a legal limit where such limit exists or is being established.
- Identify ways for regional paint associations and large multinational paint and pigment manufacturers to provide expertise or encouragement to other companies interested in stopping their use of lead additives, and to assist national governments interested in setting legal limits on lead paint.
- Engage specifically with small and medium enterprises to encourage their reformulation of lead paint.

- Engage ISO Technical Committee 35 (Paints and Varnishes) as a way of conveying alternatives to lead use among country participants and observers.
- Industry representatives can invite Alliance Partners to industry meetings to discuss the efforts of the Lead Paint Alliance and the health and environmental risks of lead paint.
- Companies that produce paints without added lead can participate in third-party certification of their paint products to help consumers recognize lead-safe paints.
- Industry (multi-national companies and SMEs) can participate in the work of the UNEP SAICM GEF Project Lead Paint Component to support paint reformulation.
- Industry associations can disseminate the UNEP Lead Paint Reformulation Technical Guidelines to SMEs and others to promote lead paint reformulation.

INTER-GOVERNMENTAL ORGANIZATIONS

- Support projects and activities to help SME paint manufacturers address barriers to stopping their use of lead additives, such as the lack of knowledge of and access to lead-free alternatives.
- Explore a role for UNIDO (including through their involvement in the Resource Efficiency and Cleaner Production Network) in engaging industry and in disseminating the Paint Reformulation Guidelines, especially focusing on SMEs
- Engage financing institutions (e.g., World Bank, Asian Development Bank, African Development Bank, others) in facilitating lead paint elimination.

LEGAL COMMUNITY

• The legal community can consult with industry experts to better develop enforceable and effective lead paint laws.

NON-GOVERNMENTAL ENVIRONMENTAL AND HEALTH ORGANIZATIONS (NGOs)

- NGOs can encourage industry to phase out lead paint through consumer choice and awareness raising.
- NGOs can engage with national industry, including SMEs, to encourage reformulation of lead paint and facilitate support there of as appropriate and relevant. For instance, NGOs can disseminate the guidelines on paint reformulation through their network.
- Workers' organizations can encourage industry to phase out lead paint to prevent occupational exposure.

ACTION AREA 3: ACTIVITIES TO INCREASE AWARENESS OF THE NEED TO PREVENT AND MITIGATE THE HEALTH AND ENVIRONMENTAL RISKS POSED BY LEAD PAINT, INDLUCING BUT NOT LIMITED TO HELPING PROMPT ACTIONS BY GOVERNMENTS AND MANUFACTURERS TO STOP THE PRODUCTION AND SALE OF LEAD PAINTS

WHO, UNEP & ADVISORY COUNCIL MEMBERS

- Continue to support and encourage participation in the International Lead Poisoning Prevention Week, held annually in October.
 - Promote and facilitate in-country stakeholder collaborations to increase awareness of the risks of lead paint, especially during the International Lead Poisoning Prevention Week.
- UNEP and WHO will communicate Alliance goals, progress and tools with partners, stakeholders and other priority audiences, including through regular newsletters, social media posts, periodic outreach to Alliance partners and regular updating of the Alliance website.
- Support awareness raising at the national level to promote development of a lead paint law, as described in the *Suggested Steps Toward Laws* fact sheet, which encourages governments to:
 - Identify the appropriate target audience(s) for awareness raising. Raise awareness of relevant government ministries, the public or industry to gain support for the development or implementation of lead paint laws; and
 - Conduct targeted awareness raising to promote the development or implementation of laws. Awareness raising topics could include adverse health, societal and economic impacts of lead, lead paint as a major source of exposure, alternatives to lead ingredients in paint, impacts of control measures and the sustainable action to eliminate lead in paint.
- Use opportunities of bi-lateral, regional and international meetings to increase awareness
 of governments and industry regarding the health and environmental risks of lead paint,
 and the need for governments to establish legal limits on lead paints.
 - Potential opportunities include UNEP Assembly (UNEA) side events; SAICM meetings and side events; Global Network of Women Ministers of Environment (interested in children's health issues); World Health Assembly side events; WHO Regional Committee meetings (such as PAHO); UN Habitat; WHO guidelines on housing and health and on management of lead exposure and prevention of lead exposures; Environmental Management Group of UN agencies, including IOMC Participating Organizations (POs); International Labour Organization (ILO); United Nations Educational, Scientific and Cultural Organization (UNESCO); United Nations

International Children's Emergency Fund (UNICEF)

- Use opportunities for advocacy for promotion of "WHO Guidelines on the Clinical Management of Lead Exposure" and add information about lead paint interventions to the WHO Guidelines on prevention of lead exposure which are under development.
- Through the SAICM GEF Knowledge Management Component,
 - WHO will develop an infographic promoting why countries should develop lead paint laws, and engage countries who have requested assistance with awareness raising.
 - UNEP will continue to maintain the SAICM Knowledge Management portal, including a wide range of lead-paint content for awareness raising and policymakers developed by a wide range of stakeholders.
 - The Lead in Paint Community of Practice will engage a wide range of stakeholders and practitioners through relevant conversations about establishing lead paint laws and addressing lead paint.

GOVERNMENTS

- Plan events or other activities for the International Lead Poisoning Prevention Week, held annually in October, and facilitate awareness raising during national, regional or international events, such as Children's Day and others.
- Governments can conduct awareness raising during national, regional or international events during the year.
- Government agencies and ministries can encourage and support awareness raising and educational efforts, for example through the school and health systems.
- Facilitate the involvement of other sectors and stakeholders such as academics, associations of physicians and paediatricians, institutions of occupational health, trade unions; home construction organizations; housing authorities and environmental organizations.

NON-GOVERNMENTAL ENVIRONMENTAL AND HEALTH ORGANIZATIONS (NGOs)

- Plan events or other activities in the International Lead Poisoning Prevention Week held annually in October.
- IPEN and individual NGOs can identify additional ways for NGOs to help increase awareness of risks, such as through paint testing, so as to promote the development of national legal limits on lead in priority countries or regions.
- Health NGOs can initiate outreach to the medical community and health care providers, both internationally and nationally:
 - To paediatricians
 - To other physicians such as psychologists

• Provide outreach to schools or other organizations in countries without legal limits on lead paint, and in countries with existing high levels of lead in residential or decorative paints.

INDUSTRY

- Plan events or other activities for the International Lead Poisoning Prevention Week of Action, held annually in October. (WCC)
- Continue to spread awareness of the risks of lead paint during national, regional and global industry events.

ACTION AREA 4: ACTIVITIES TO ENCOURAGE PARTNERS TO FULLY REALIZE THE GOALS AND OBJECTIVES OF THE ALLIANCE

UNEP, WHO & ADVISORY COUNCIL MEMBERS

- Welcome and encourage engagement of new partners as an important way to further raise awareness of the issue, stimulate action to eliminate lead paint, and increase the profile of the partnership.
- Encourage partners to fully realize the goals and objectives of the Alliance through actions that:
 - o Identify and reach out to new strategic partners of the Lead Paint Alliance.
 - Update UNEP Lead Paint Alliance website partner page to include examples of ways that partners can engage in the Lead Paint Alliance.
 - Utilize Alliance partner database and other existing listservs to share information and updates. Continue to provide a regular newsletter to partners and other interested parties.
- Continue to reach out to alternative raw material suppliers, potential lead "user groups" and technical societies to spread awareness and encourage them to join and engage.
- Reach out to the International Maritime Organization about interest in the Lead Paint Alliance to potentially support their work with paint manufacturers in the arena of biofouling and global marine anti-fouling coatings.