



## SECTION 1

# INTERNATIONAL POPS ELIMINATION NETWORK (IPEN)

&

# QUALITY COUNCIL OF INDIA (QCI)

**Voluntary Certification Scheme for  
Lead Safe Paints**

## INTRODUCTION

## Introduction

### 1. Back ground information

**1.1** Lead is a well-known neurotoxin and is known to damages, destroy or impair the function of the nervous system. Historically it has been used by paint manufacturers as a colouring agent, to enhance durability, longevity and to make it corrosion resistant.

**1.2** Lead in paints is a toxic threat to the young children, especially between the age group of 0-6 years. It impacts 40 million children worldwide, over 97 per cent of whom live in developing countries. Health and environmental concerns have prompted the governments across the globe to ban the use of lead in household paints. It has been reported by medical journals that the global metal pollution scenario shows that the emissions are much more than the production. This results in 15–18 million children in developing countries suffering from permanent brain damage due to lead poisoning.

**1.3** Lead in paints is not such an emerging issue in the developed world. Many European countries banned the use of lead in 1935 while the United States did so in 1971. However, it is an emerging issue for the developing countries, particularly due to lack of public awareness. Also, issues related to technology and formulations add to the grim scenario. Imported lead free pigments are available in the market but in large quantities that make it difficult for the small and medium manufacturers to purchase imported pigments as their requirements are small. These bottlenecks faced by the paint industry hinder them from shifting from lead to lead free paints.

### 2. Status at International and National levels

**2.1** Although, the World Health Organization (WHO), while reviewing the current science on Lead toxicity, has declared that there is “no safe blood lead level” in humans, the current internationally prevalent standard for Lead in paints is 90 parts per million (PPM). Further, although countries like Brazil, Canada, China, Sri Lanka and USA have standards and regulations in place while with respect to Lead content in paints, countries like India do not have any mandatory standards and regulation for Lead in Paint.

**2.2** In India, some paint companies have voluntarily shifted from lead to lead free formulations of decorative paints. But even if lead is not added directly to the paint, still

the paint can have varying levels of lead content due to the raw materials like resins, etc, containing lead used during formulations. It has been reported that in case of lead pigments, there are no 100% alternatives available in the market and thus the manufacturers are forced to use lead based pigments. Alternatives are available only to a few, but not for SMEs as they require much less quantities for their operations. However, many paint companies today are supportive of any initiative towards elimination of lead from decorative paints. It is also apparent that the paint industry themselves are aware of the health problems due to lead and are eager to be part of such initiative.

**2.3** Many developing countries, including India, today do not have any regulations concerning limit of Lead in paints. Although in India, the Bureau of Indian Standards (the national standards body of India) has introduced limit for Lead content varying from 90 – 1000 PPM for different categories of paints and also has a product certification scheme in place, there is no third party certification scheme offering certification against a single attribute (Lead content only) standard for paints. The BIS certification scheme covers all requirements of paints as covered in its paint standards.

### **3. Initiation of the project on Lead Safe Paint Certification Scheme**

**3.1** Considering the above aspects, under the **EU funded Lead Paint Elimination Project, Quality Council of India (QCI)** was contracted by the **INTERNATIONAL POPS ELIMINATION NETWORK (IPEN)** for developing a workable Scheme, in line with international practices and through a multi-stakeholder consultation process and by setting up committee(s), as necessary to develop the certification criteria/standards and rules for certification, etc and to secure buy-in to the scheme by participating stakeholders, including in particular, participating paint companies.

**3.2** The scheme is formulated to fulfil the following objectives:

Objective 1: Promote awareness about the ill-effects of lead and to inform consumer about the source of leads especially so with respect to the Lead in Paints

Objective 3: Formulate a scheme that provides with alternatives available to adopt reduction/elimination of lead from paints

Objective 4: Present consumer with an alternative choice that has a system of verification of claim made by the manufacturer which is backed up by certification mark or conformity statement.

Objective 5: Provide information to consumers and painters about the lead content of paints to allow them to make informed purchasing decisions and to minimize

exposures.

**3.3** As per the contract, in collaboration with IPEN, represented by **Toxics Link** as the Indian Project Partner of the EU-funded Lead Paint Elimination Project, QCI was required to organize a series of meetings to bring together a small group representing the following stakeholder groups like Paint manufacturers, Government Representatives, Consumer NGOs, Medical Community, Major Purchasers.

**3.4** Subsequently through consultative meetings among the committee members, the QCI was made responsible for developing the Voluntary Certification Scheme for the Paint Industry consistent with the objectives of the Switch Asia Lead Paint Elimination Project. As per the mandate prepared, the Scheme is required to include issues like Scope and objectives, Intended Use, Certification criteria, Certification process, Governance Structure, Requirements (linked to objectives) including initial and ongoing testing procedures, labeling requirements, and record keeping, requirements for Certification Bodies and the plan for how to implement the Certification scheme.

**3.5** Accordingly, a **Lead Safe Paint Certification Scheme** was developed and handed over to IPEN for implementation at international level in different economies as per IPEN's initiative. At the same time using the same consultative mechanism, an India specific scheme was also developed.

**3.6 Implementation of the Lead Safe Paint Certification Scheme in India –** Recognising the need for a mechanism for sensitizing consumers and all major paint purchasers and specifiers to select safer paint products, encouraging good manufacturing practices by means of certification, and introducing Lead Safe Paint™ in the Indian market, an MOU was signed between IPEN and QCI on 27 April 2016, according to which the Scheme is jointly owned by IPEN and QCI and QCI has been entrusted the responsibilities for managing the operations in India. Through the release of the scheme specific documents the Lead Safe Paint product certification scheme is being formally launched in India.

### **3.7 About the organizations involved**

**3.7.1 IPEN (International POPs Elimination Network)** – Is a leading global organization promoting policies and controls on the production, use and disposal of toxic substances to protect human health and the environment. IPEN has established 8 regional hubs with more than 700 Participating Organizations in 116 countries. Activities by member organizations are building an international leadership that is changing approaches to chemical safety internationally and within member countries. It has nationally and internationally recognized leaders and experts in the fields of

science, health, environment and public policy. IPEN has regional hubs in Latin America, Anglophone Africa, Francophone Africa, Middle East, Central Europe, Eastern Europe, Caucasus and Central Asia (Russian speaking), South Asia and Southeast Asia. More information can be obtained from IPEN website [www.ipen.org](http://www.ipen.org).

**3.7.2 Toxics Link** - is a not-for-profit initiative of the Just Environment Charitable Trust based in New Delhi, emerged from a critical need to address a vacuum that existed on the issue of toxicity and its impact on life and environment. Toxics Link is constituted by a group of people working together for environmental justice and freedom from toxics, with specific mandate to collect and share information about the sources and dangers of poisons in our environment and bodies, as well as about clean and sustainable alternatives for India and the rest of the world. More information can be obtained from Toxics Link website <http://toxicslink.org/>.

**3.7.3 Quality Council of India (QCI)** is registered as a non-profit society with its own Memorandum of Association and is governed by a Council of 38 members with equal representations of government, industry and consumers. The Council is playing a pivotal role at the national level in propagating, adoption and adherence to quality standards in all important spheres. The principal tasks are to establish and operate national accreditation structure and promote quality through National Quality Campaign. More information can be obtained from QCI website [www.qcin-org](http://www.qcin-org).

#### **4. Broad Outline of the Lead Safe Paint Certification Scheme and the relevant Documentation**

**4.1** The Scheme is based on a “Criteria for certification”, which has been evolved through discussions among the members of a Technical Committee constituted by QCI. The members of the committee represented different stakeholders like industry associations, consumer associations, NGOs, academic and research organizations, test laboratories, accreditation body, certification bodies, etc. as per the deliberations of the technical committee, a certification criteria specific to India was developed. .

The criteria thus developed is based on single attribute – Lead content and has also specified certain process related requirements as enablers. This criteria has been enclosed vide section 3.

**4.2** In order to regulate the operation of the Scheme and promote uniformity in its operation and the interaction between the Certification Bodies (CBs), the Paint manufacturers seeking product certification and the Lead Safe Paint Scheme owners, a document has been established, which details the certification process. This document, which has been enclosed vide Section 4, explains the processes for

certification under the Lead Safe Voluntary Certification Scheme and lays down the requirements that shall be followed in order to obtain, operate and maintain the Certification.

**4.3** Under this Scheme, each paint manufacturing unit is required to obtain a certification for use of Lead Safe Certification Mark from an approved certification body (CB) which is accredited to the international standard governing operation of product certification bodies, namely ISO/IEC 17065:2012 (Conformity assessment — Requirements for bodies certifying products, processes and services), by the National Accreditation Board for Certification Bodies (NABCB) and a document called the “Requirements for Certification Bodies” elaborates the requirements specified in ISO/IEC 17065:2012, as applicable to the Certification Bodies operating the Voluntary Certification Scheme for Lead Safe Paints. This document has been enclosed at Section 6.

The Certification Bodies, for the purpose of getting approval for operating this scheme are required to establish their internal systems in accordance with the requirements specified in ISO/IEC 17065:2012 as read with the “Requirements for Certification Bodies” and are required to get accreditation against these requirements from NABCB.

**4.4** The Scheme also prescribes the use of a Certification Mark and the rules for the use of the Certification Mark by the paint manufacturers certified under Scheme by the certification bodies approved by the Scheme Owners (IPEN + QCI) have been developed and are enclosed vide Section 5.

**4.5 Provisional Approval System for Certification Bodies** - This document, which is enclosed at Section 7, sets out the requirements to be fulfilled by CBs desirous of operating under the Scheme pending formal accreditation by NABCB. Section 8 encloses the Application for Certification Bodies, applying for Provisional Approval and Section 9 encloses the Agreement between Certified Lead Safe Manufacturing units and the Scheme Owner for use of Lead Safe Paint Certification Mark.

**4.6 Governing Structure** - In accordance with the MOU between IPEN and QCI and for the purpose of operation and maintenance of the Lead Safe Paint Certification Scheme in India, a Governing structure has been established. The details of this are given in Section 2 of the Scheme documents.

**4.7** The complete set of documentation for Voluntary Lead Safe Paint Certification Scheme consists of the following sections:

Section	Title
Section 1.	Introduction
Section 2.	Governing Structure
Section 3.	Certification Criteria
Section 4.	Certification Process
Section 5.	Rules for use of Certification Mark
Section 6.	Requirements for Certification Bodies
Section 7.	Provisional Approval System for Certification Bodies
Section 8	Application for Certification Bodies, applying for Provisional Approval
Section 9	Agreement Between Certified Lead Safe Manufacturing units and the Scheme Owner for use of Lead Safe Paint Certification Mark

**5. Verbal Forms used** - The following verbal forms have been used throughout the various documents comprising this scheme:

- a) “Shall” is used to indicate requirements to be followed;
- b) “Should” is used to indicate a recommendation, indicating that instead of the means prescribed, any other mean may also be used;
- c) “May” is used to indicate what is permitted;
- d) “Can” indicates a possibility or a capability.