Regional Workshop for Central and Eastern Europe: Case Studies on Lead Paint

Republic of Moldova
Elena Jardan – Ph.D.
Senior consultant, Ministry of Health, Labor and Social Protection
Natalia Efros - Environmental Pollution Prevention Office

19.03.2019
Driving factors that have led to action on lead paint (1)

! The tragic past when Republic of Moldova was the transit country for lead gasoline.

! Over 25,000 tones/year national production of paints. Imported products (raw materials) amount > 30,000 USD/year.

! Multiple exposure routes/existing vulnerable groups, in special children 6+.

! Long term research (5+ years) on lead exposure of Moldovan citizens.

! Lack of awareness that this problem exists.

! Existing technical regulations are not protective.
WHO International lead poisoning prevention week of action, 2018

Since 2013, Republic of Moldova organize the International Lead Poisoning Prevention Week of action in accordance with Ministry of Health Order, and based on WHO methodological support,
- Was developed and disseminated leaflets, articles, posters,
- Published articles in national library about the impact of lead in paints,
- With others, organise round tables, conferences and interviews at TV and radio to draw the attention of the community and to the problems caused by lead contamination.

Republic of Moldova part of GAELP, next meeting – May, 2019
## Data based on scientific evidence

<table>
<thead>
<tr>
<th></th>
<th>Experimental area /Normative value</th>
<th>Control area /Normative value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air, mg/m³</td>
<td>0.19±0.02/0.0007</td>
<td>0.09±0.05/0.0005</td>
</tr>
<tr>
<td>Soil mg/kg</td>
<td>30.78±0.12/30</td>
<td>16.56±1.5/20</td>
</tr>
<tr>
<td>Lead incorporation with</td>
<td>0.86/24 h</td>
<td></td>
</tr>
<tr>
<td>consumption of food products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>BLL adults average µg/dL</td>
<td>0.253</td>
<td>0.1±0.003</td>
</tr>
<tr>
<td>BLL children, µg/dL</td>
<td>2.83</td>
<td>0.1±0.003</td>
</tr>
<tr>
<td>Urine lead level, µg/dL</td>
<td>1.5</td>
<td></td>
</tr>
<tr>
<td>Lead in hair adults, µg/g</td>
<td>0.205</td>
<td></td>
</tr>
<tr>
<td>Lead in hair children, µg/g</td>
<td>0.572</td>
<td></td>
</tr>
</tbody>
</table>
Existing legal provisions

- National Health Program 2020 approved by Government
- Law nr. 10/2009 on State Surveillance of Public Health
- Government Decision nr. 808/2015 regulates Lead in Toys: 13.5 mg/kg (dust), 3.4 mg/kg (liquid), 160 mg/kg (scraped)
- Government Decision nr. 1207/2016 regulates Lead in cosmetics: Lead and lead compounds prohibited in cosmetic products
- Indicate to elaborate a regulatory mechanism to ban lead in paint
- Lead in Paints are subject to sanitary approval
- New legal document to regulate lead in paint
Law on Chemicals no. 277 of 29.11.2018 transposes 13 European Directives, including:

- Regulation (EU) 649/2012 concerning the export and import of hazardous chemicals
- Regulation (EC) 1272/2008 on classification, labelling and packaging of substances and mixtures
Requirements for the use of hazardous chemicals, including persistent organic pollutants, such as mercury, lead, cadmium, hexavalent chromium, phthalates, ozone depleting substances, including hydrochlorofluorocarbons, in electrical and electronic equipment, in vehicles, accumulators and batteries, packaging or components of packaging and other articles or devices manufactured or placed on the market shall be established by special legislation.
Roadmap for Law implementation

February, 2020 - Law enters into force in 12 from publication in the Official Gazzette

- establishment of the Chemicals Agency and strengthen its capacities;
- Development of the secondary framework; REACH, CLP, PIC

February 2021 - 1 year after entering into force

- amendment to the relevant normative acts;
- Establishment of the Informational System "Register of chemicals placed on Molodvan market."

March, 2021 (2 months after entering into force)

- The legal persons handling the following chemicals shall obtain an authorisation for detergents; substances posing risk to human health and environment; industrial hazardous chemicals, ozone depleting substances
- The legal persons selling particularly hazardous chemicals shall apply for permit for selling, distribution and/or transfer of such chemicals

2021

- Grant authorisations for BP, (1 year since the establishment of the Agency)

2022

- Grant authorisations for PPP, (2 years since the establishment of the Agency)
- Gradual establishment of the Classification and Labelling System and Inventory
<table>
<thead>
<tr>
<th>Regulation</th>
<th>Substances</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft PIC regulation</td>
<td>• Lead compounds, Tetraethyl lead, Tetramethyl lead - subject to PIC procedure</td>
<td></td>
</tr>
<tr>
<td>REACH Regulation – to be</td>
<td>• Lead chromate, Lead sulfochromate yellow (C.I. Pigment Yellow 34), Lead</td>
<td>subject to authorization</td>
</tr>
<tr>
<td>developed</td>
<td>chromate molybdate sulphate red (C.I. Pigment Red 104) – subject to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>authorization</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Lead carbonates (PbCO₃  2PbCO₃ - Pb(OH)₂) and Lead sulphates (PbSO₄) Pbₓ</td>
<td>shall not be placed on the market, or used, as substances or in mixtures,</td>
</tr>
<tr>
<td></td>
<td>SO₄) - shall not be placed on the market, or used, as substances or in</td>
<td>where the substance or mixture is intended for use as paint</td>
</tr>
<tr>
<td></td>
<td>mixtures, where the substance or mixture is intended for use as paint</td>
<td></td>
</tr>
<tr>
<td>CLP regulation – to be</td>
<td>• The packaging of paints and varnishes containing lead in quantities</td>
<td>subject to PIC procedure, REACH Regulation – to be developed, CLP regulation –</td>
</tr>
<tr>
<td>developed</td>
<td>exceeding 0,15 % (expressed as weight of metal) of the total weight of the</td>
<td>to be developed</td>
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<tr>
<td></td>
<td>mixture shall be labelled</td>
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</table>
Law on atmospheric air protection 1422-XIII din 17.12.1997 establishes prohibitions and restrictions on production, import, placing on the market and use of hazardous chemicals, including lead in paint, fuel, and other products, including tetramethyl lead and other products.
### National standards

Excerpt from the **List of Related National Standards** on varnishes and paints:

- GOST 10503-71 Oil paints ready for use Specifications
- GOST 11279.1-83 Organic dyes. Testing method of dyeability (concentration), shade and purity
- GOST 11279.8-83 Organic dyes. Testing method of PVC film colours fastness to dry and wet rubbing.
- GOST 11481-75 Water colour paints for artists use. Specifications
- GOST 11583-74 Polimer materials, building and finishing. Methods for the determination of light resistance and uniformity of painting and lightness
- GOST 11826-77 Oil paints and pentaoil for artists use. Specifications
- GOST 18958-73 Silicate paints
- GOST 19279-73 Polymer-cement paints
- GOST 28196-89 Water-dispersion paints. Specifications
- GOST 8292-85 Oil and paste colour paints. Specifications

The following **national standards** may be used for laboratory tests to determine the lead content in varnishes, paints, painters and glazed tiles:

The main barriers in setting the limits:

• Lack of appropriate regulatory frameworks to control the manufacture, import, export, sale, and use of lead paints and products coated with lead paints

• Poor enforcement of laws and regulations due to poor institutional, infrastructure and monitoring capacities

• Lack of unique and clear standards or limit values (EU – the REACH Regulation, Central Asia – the Technical Regulation of the Customs Union)

• Inconsistencies within the existing regulations (REACH and Technical Regulation of the Customs Union) as regards the limit values (dry matter – 50-90 ppm and content in mixture - <600 ppm)

• Lack of laboratory capacities (monitoring and standards) to conduct regular testing of lead paint or to conduct biomonitoring programmes

• Lack of awareness among producers and consumers

• Financial constrains
Proposed actions to have legal limit on lead in paint by 2020

• Enforcing Laws and Regulations – ban or restrict by setting a limit of lead content in paint
• Establishing clear limit values basing on existing regulations supported by scientific expertise as well existing alternatives
• Updating the methods of determination lead compounds in paints
• Adopting the procedure for norming lead in paints
• Setting clear roles and responsibilities of all the stakeholders (Government, business, NGO; civil society)
• Awareness rising and capacity building activities
• activities among producers/importers/consumers
• Establishing dedicated trade /producers /importers /distributors associations
• Identifying incentives for industries to reduce or eliminate lead in paint or in pigments
Process that resulted in proposal of law that limits lead in paint

• To establish legal limits and laws on lead in paint in order to prevent children’s exposure to paints containing lead.

• To achieve the phase-out of the manufacture and sale of paints containing lead and to eventually eliminate the risks on health and environment.

• Increase awareness and increase opportunities for partners to engage.
Factors that contributed to success in establishing a law

• To create an inter-sectorial working group for drafting regulation.
• Approve the Draft of National Strategy and Action Plan to Eliminate Lead in Paint.
• Learn the successful case studies from other partners.
• Methodological support.
Thank you for your attention!

Elena Jardan – Ph.D, Senior consultant, Ministry of Health, Labor and Social Protection
E-mail: elena.jardan@msmps.gov.md

Natalia Efros – Consultant, Environmental Pollution Prevention Office
E-mail: natalia.efros@eppo.md