



a toxics-free future

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International SAICM Implementation Project (ISIP)

In 2010, in an effort to demonstrate SAICM implementation via IPEN Participating Organizations, IPEN launched an International SAICM Implementation Project, also known as ISIP. ISIP aims to mobilize resources for initial enabling activities pertaining to national priorities, in keeping with the work areas set out in the strategic objectives of section IV of the SAICM Overarching Policy Strategy.

In particular, the ISIP supports the Governance objective of SAICM's Overarching Policy Strategy paragraph 26, which calls for enhanced "cooperation on the sound management of chemicals between Governments, the private sector and civil society at the national, regional and global levels."

In addition, ISIP builds on the 2008-2009 Global SAICM Outreach Campaign to raise awareness about SAICM and strengthen collaboration among the public interest, health and labor sectors.

ISIP Objectives

ISIP's four objectives include:

- Promoting the need for sound chemicals management
- Advancing National SAICM Implementation
- Promoting global SAICM implementation by global civil society
- Building capacity among NGOs developing countries and countries with economies in transition

Title of activity: Collection of Lead Based Paint Samples in Uganda

NGO: Uganda Network on Toxic Free Malaria Control (UNETMAC)

Country: Uganda

Date: March, 2012

Elements of SAICM Covered:

Participation in activities related to the Global Partnership to Eliminate Lead Paint including identifying potential lead exposure, raising awareness of toxicity to human health and the environment and alternatives, prevention programs to reduce exposure, and promotion of national regulatory frameworks; Follow up recommendations and options for the SAICM OEWG and ICCM3 (57, 157, ICCM2 decision II/4)

Description of the harms of lead exposure, including suspected harm:

Although lead improves paint performance, it is a dangerous substance. It is especially damaging to children under age of six whose bodies are still developing. Lead causes

nervous system damage, stunted growth, and delayed development. It can cause kidney damage and affects every organ system of the body. It is also dangerous to adults, and can cause reproductive problems for both men and women. Lead paint is particularly dangerous because it tastes sweet, therefore encouraging children to put lead chips and toys with lead dust in their mouths (Coles G V, 1971).

Description of the Global Partnership and decision taken at ICCM2, including any national initiatives to advance this decision:

In May 2009, the Second International Conference on Chemical Management (ICCM2) endorsed a proposal from an IPEN participating organization from India, Toxics Link, to form a partnership to promote the global phase-out of lead in paints, which was also endorsed by the G8 and by the industry itself, via the International Paint and Printing Ink Council. Despite this effort, the issue of lead paint has not been given the due attention in Uganda. There is no specific study that has ever been done on lead paint in Uganda and the few studies that have been done on lead in Uganda are general in nature.

Description of any existing national laws or policies about lead in paint:

In Uganda, there is no specific law to deal with lead in paint, nor is there any specific law to deal with heavy metals. Generally, there are no inclusive laws for chemicals management in Uganda. The laws which are in place are scattered in different legislations. There are some legal instruments in place to help in the management of chemicals in Uganda, but these laws/legislations do not adequately address all the chemical concerns. These include;- the 1995 Ugandan Constitution, the National Environment Act Cap 153, the Public Health Act 269, the Control of Agricultural Chemicals, Statute 8/1989, the National Drug Statute 1993, the National Environment Statute 1995, the Uganda National Bureau of Standards Act, the Plant Protection Act. Cap. 244 of 1964, the Protection of Animals (anaesthetics) Acts 1954/64, the National Medical Stores Act 2000, the Factories Act 2000, the Employment Decree of 1975 and the East African Community Customs Management Act 2004, among others.

There are also other regulations such as- the Chemicals Regulations (Registration and Control) 1998; the Guidelines for Inspection issued by- Agrochemicals Board, Uganda National Bureau of Standards (UNBS) and the National Drug Authority (NDA); the Modalities for safe disposal of chemicals Regulations; the National Environment (Waste Management) Regulations 1999; the Environment Impact Assessment Regulations 1998; the National Environment Standards for the discharge of Effluents onto Land or Water Regulations 1999; the Regulations on Ozone Depleting Substances; the National Environment (Minimum Standards for the Management of Soil Quality) 2001; the National Environment (Waste Management) Regulations 2001; the National Environment (Conduct and Certification of Environmental Practitioners) Regulations 2003; the Guidelines for Solid Waste Management in Uganda 2004; and the Environmental Audit Guidelines for Uganda 2006, among others.

Due to the fragmented nature of the chemicals laws/legislations/regulations in Uganda, it has been and is very difficult to implement and enforce them. The other factors that contribute to difficult enforcement and implementation are: pecuniary constraints, lack of appropriate monitoring tools and equipment, ill-motivated law enforcement personnel, inadequate penalty provisions, lack of institutional co-operation in some aspects and lack of adequate technical personnel to handle chemical related problems. For instance, the National Environment Management Authority (NEMA), during the situation analysis for the national implementation plans (NIPs) under the POPs project in 2010, considered the regulation on pesticides to be inadequate, although it incorporates all the

international techniques for the management of pesticides. Management of industrial and other chemicals is still deficient and needs to be addressed.

Uganda is a party to several international Conventions and Agreements related to the management of chemicals. These include- the Stockholm Convention on Persistent Organic Pollutants (POPs), the Vienna Convention on the Protection of the Ozone Layer, the Montreal Protocol on substances that deplete the Ozone Layer, the Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction, among others. Although Uganda is a signatory to these wonderful agreements, the national implementation of the principles of these Agreements cannot be said to be excellent. There is therefore a need for a comprehensive legislation covering all chemicals

Description of types of paints available on the market, including paints that do not contain lead:

There are so many paints on the Ugandan market, some of which are manufactured locally, while others are imported from countries such as China (Bartrop et al, 1973). The construction sector is one of the fastest growing sectors in Uganda. Construction companies, estate developers, hardware shops, and institutions, as well as individuals, are the potential consumers of paint products in the country. Some of the paints on the Ugandan market include: water-based paints (which are cheap), and the primers, textured paints and decorative paints (whose prices are slightly higher). There are also emulsion paints and enamel or oil based paints on the Ugandan market. The basic key players in the business include; Sadolin paints, Basco paints, Peacock paints, Regal paints, Trust paints, Global paints, Imperial paints, Victory paints, and Ritver paints, among others. The most common manufacturing companies of paints in Uganda are: Peacock Paints (U) Ltd, Revlon Paints (U) Ltd, Sadolin Paints (U) Ltd, Crown Berger (U) Ltd, Kanoni Plastic Works Co. Ltd, BPC Chemicals Ltd, Quality Plastics (U) Ltd, Ritver Paint Ltd, Afri Plast Industries Ltd, Air Cond, East African Paints Manufacturers Ltd, Hengchang Plastic (U) Co. Ltd, High Tech Rubber Products, Marchinery & Plant Ltd, and Omega Plastics Ltd.

Description of the concentrations of lead in the paints tested:

Out of the eight brands of the paint samples tested from Uganda (Basco paints, Global paints, Imperial paints, Peacock paints, Regal paints, Sadolin paints, Trust paints and Victory paints), three brands (Victory paints, Regal paints and global paints) were found to contain significant concentrations of lead, ranging from 2200-7700 ppm.

Project Outcomes:

Description of the activity conducted to advance the Global Partnership to Eliminate Lead in Paint:

Paint samples were from the Ugandan market by Uganda Network on Toxic Free Malaria Control (UNETMAC). Two (2) samples were prepared from every single paint container. Thus, out of the 50 paint containers, 100 samples were prepared. The preparation was done at the laboratory of the Chemistry Department at Makerere University (MUK) under the technical guidance of Dr. John Wasswa. In total 50 paired (100) paint samples (8 Basco paints, 4 Global paints, 6 Imperial paints, 5 Peacock paints, 6 Regal paints, 8 Sadolin paints, 8 Trust paints and 5 Victory paints). The method for collecting and preparing paint samples was based on the lead paint inventory and testing protocol by the Occupational Knowledge International (OK

International). Of the 100 samples collected, 98 of them were sent using FedEx to the Forensic Analytical Laboratories of the OK International in the US for analysis.

Additionally, 1,000 copies of policy briefs were prepared and produced, and some were disseminated at a press conference. Others were distributed to multi-sectoral participants at a workshop to review the draft regulation on sound management of chemicals in Uganda, organized by the National Environment Management Authority (NEMA).

Impact on target groups:

Upon the receipt of the results by UNETMAC, 1,000 copies of policy briefs were prepared and produced in consultation with the IPEN Regional Hub Coordinator and the IPEN General Manager (International Coordinator). These were disseminated to the general public. Lead in paints being a major threat to children, the policy briefs were tailored in a simple language that can easily be understood. This project feeds very well into the existing international NGO efforts, especially IPEN's International Campaign to Eliminate Lead from Paint and the Global Partnership to Eliminate Lead in Paint. It is anticipated that the target groups will better understand the negative effects of lead paint exposure on human health and the environment, and this will act as an eye opener for them to change to non-lead containing paints.

Impact on target policies:

This project is expected to act as an eye opener to the public, especially to the paint manufacturers, traders and policy makers (specifically those policy makers responsible for regulating the use of chemical related products in the country; for instance, Uganda Revenue Authority (URA)). As NEMA is in the process of formulating a comprehensive national law on chemicals management in Uganda, this project is a golden opportunity; as such, UNETMAC intends to use this opportunity to influence NEMA's processes.

Outreach to stakeholders:

During the designing of this project, some stakeholders like the National Environment Management Authority (NEMA) were consulted. The Department of Chemistry, Makerere University, was also consulted and engaged during the designing and implementation of this project. The reports and materials generated by this project will be posted on IPEN's and UNETMAC's websites, and this will easily be accessed by different stakeholders. A press conference was organized for the dissemination of the policy briefs and press release was published in one of the national newspapers.

Deliverables, outputs and/or products:

The specific deliverables of this project include:-

- 50 lead based paint samples collected and tested;
- 1,000 copies of policy briefs produced and disseminated;
- News paper clipping; and
- Project Report

Communication efforts:

After the publication of the policy briefs, a press conference will be convened. This will provide an opportune moment for the dissemination of the analysis results to the general public.

SAICM National Focal Point: .

The SAICM National Focal Point is Mr. Ntuju G., Isaac an officer at the National Environment Management Authority (NEMA). His contact email is: iigtujju@nemaug.org and tel: **+256 (0) 772 699 828**. The details at NEMA can be accessed at: www.nemaug.org

NGO Recommendations for next steps:

- More research is needed, including identifying potential lead exposure. For instance, more lead based samples should be collected from other parts of the country and tested. Research is also needed on examining the impact of lead exposure on human health and environment.
- Public awareness about the toxicity of lead exposure to human health and the environment is highly wanted. The public also should be educated on the existence of alternatives.
- There is a need to advocate and lobby for prevention programs to reduce lead exposure, and for promotion of national regulatory frameworks.
- NGOs also should continue to make a follow up recommendations and options for the SAICM OEWG and ICCM3 (57, 157, ICCM2 decision II/4)