



**CANADIAN PAINT
AND COATINGS
ASSOCIATION**

**ASSOCIATION CANADIENNE
DE L'INDUSTRIE DE LA PEINTURE
ET DU REVÊTEMENT**

October 3, 2016

Global Alliance to Eliminate Lead in Paint

United Nations Environment Programme
Chemicals Branch
Division of Technology, Industry and Economics
International Environment House
11-13, Chemin de Anémones
CH-1219 Châtelaine, Geneva
Switzerland

CC: IPPIC Secretariat
Mr. Stephen Sides
Secretariat
International Paint and Printing Ink Council, Inc.
1500 Rhode Island Ave. NW
Washington, DC 20005

RE: CPCA Support of IPPIC and Objectives of GALEP

The Canadian Paint and Coatings Association (CPCA) fully endorses IPPIC's statement of support for the Global Alliance to Eliminate Lead Paint (GALEP) "International Week of Support" for lead poisoning prevention.

The Canadian Paint and Coatings Association works with Health Canada, relevant stakeholders and industry generally to help prevent product-related injuries and to promote safety and the responsible use of household products in Canada. Health Canada is the lead federal department for the control of hazardous products under such Acts as the Canada Consumer Product Safety Protection Act and the Controlled Products Regulations, and it:

- Conducts research on potential hazards associated with consumer products;
- Raises awareness of potential risks of injury through our product safety advisories, warnings and recalls;

- Develops and enforces product safety regulations and standards; and
- Provides channels for reporting product-related injuries, deaths, and safety-related issues with consumer products.

The lead content of consumer paints sold, imported or advertised in Canada is regulated under the Surface Coating Materials Regulations. Corrective action (e.g., product recalls) is taken on consumer paints that contain more lead than is permitted by law and that has been done in recent years where imported products were found to have exceeded the established lead limits in Canada. In October 2010, the Government amended the *Surface Coating Materials Regulations (SCMR)* to significantly lower the level of total lead allowed in paints and other surface coating materials from 600mg/kg to 90 mg/kg - which is equivalent to a lead concentration of 0.009%. This new Canadian lead limit is among the strictest in the world.

Following Health Canada's analysis of the lead content in surface coatings on several consumer paint products in 2009 and 2010, CPCA was recently informed that Health Canada will be undertaking cyclical enforcement activities of the *SCMR* with respect to artists' paints for lead concentrations. The focus will be on arts, crafts, hobby paints, and specialty paints dedicated to art supply stores. CPCA has provided Health Canada with additional up-to-date information on US and Canadian players in the Canadian artist paint market and Health Canada will contact these members directly.

Health Canada has undertaken a comprehensive review of the current toxicological and toxicokinetic data on lead. The proposed risk management objective for lead is to provide continuing support for existing federal management actions under the Canadian federal *Risk Management Strategy for Lead*, and to pursue additional management measures to reduce exposure to lead, and hence associated risks, to the greatest extent practicable. Please see the following link to the risk management strategy. http://www.hc-sc.gc.ca/ewh-semt/pubs/contaminants/prms_lead-psgr_plomb/index-eng.php

The Canadian Paint and Coatings Association will continue its ongoing support for IPPIC's work and the objectives of GALEP. For further information on Health

Canada's role in lead paint, visit their website (<http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/prod/paint-peinture-eng.php>) as well as the Association's website (<http://www.canpaint.com/lead-paint>).

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary LeRoux", with a stylized flourish at the end.

Gary LeRoux
President & CEO
Canadian Paint & Coatings Association