



Centre de Recherche et d'Éducation Pour le Développement
Research and Education Centre for Development

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Déclaration d'Association No 000408/RDA/J06/BAPP

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To: European Commission and members of the REACH Committee

July 1, 2016

Dear Sir/Madam:

Ref: Application by Dominion Colour Corporation for an authorisation for continued manufacture and sale of two lead chromate pigments.

We, as organizations and individual scientists in non-EU countries that will be affected by the upcoming decision, request that the European Commission and members of the REACH Committee reject the application by Dominion Colour Corporation for an authorisation to continue manufacturing and selling two lead chromate pigments.

The following reasons why the application should be rejected are, in our opinion, compelling:

- 1) Dominion Colour Corporation has stated that one reason why it is seeking the authorisation is to allow Small and Medium Enterprises (SME) to compete in exports of these lead chromate paints to non EU countries.¹
- 2) The measures included in the proposed EU authorisation, such as requiring protective equipment for workers and monitoring, would have no application in countries in Africa or Asia or elsewhere that the lead chromate pigments could be exported.
- 3) If the REACH Committee grants the authorisation, it would be facilitating the export of lead pigments to countries outside the EU, where there will be no compliance with the EU monitoring, an absence of any national regulations on occupational exposure to lead or to hexavalent chromium, and absence of regulations controlling how these lead pigments are used in the marketplace.
- 4) Akzo Nobel, the world's leading paint and coating industry has stopped using these lead chromate pigments, and early this year PPG announced that it will phase out all lead paints in its global operations.
- 5) If it approves the application, the EU would be undermining efforts by the paint industry to stop use of lead and would be undermining the UN initiative through the Global Alliance to Eliminate Lead Paint.

We therefore ask that you reject the application by Dominion Colour Corporation to continue manufacturing, selling and exporting the two lead chromate pigments.

Yours sincerely,

ORGANISATIONS:

1. Gilbert KUEPOUO, Ph.D., Executive Director, Research and Education Centre for Development (CREPD) CAMEROON
2. Mohit Gupta, coordinator, Occupational and Environmental health Network of India (OEHNI)
3. Tadesse Amara, Executive Director, Pesticides Action Nexus, ETHIOPIA
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7. Mwachini Myanza, MA Economics, Irrigation Training and Economic Empowerment Organization – IRTECO, TANZANIA
8. Elorm Kokou AMEGADZE, Environmental Journalist, Friends of the Earth, Togo (Amis de la Terre (ADT) Togo), TOGO
9. Perry Gottesfeld Executive Director, Occupational Knowledge International (USA)
10. Kathleen Ruff, director, RightOnCanada.ca, CANADA
11. Silvani Mng'anya, General Secretary, AGENDA, TANZANIA
12. Ram Charitra Sah, Executive Director, CEPHED , NEPAL
13. Mr. Noli Abinales, President, EcoWaste Coalition, PHILIPPINES
14. Penchom Saetang, Director, Ecological Alert and Recovery - Thailand (EARTH), Nonthaburi, THAILAND
15. Saree Aongsomwang, Secretary General, Foundation for Consumers, Bangkok, THAILAND
16. Yuyun Ismawati, Senior Advisor, BaliFokus Foundation, MALAYSIA
17. S.M. Mohamed Idris, President Consumers Association of Penang, MALAYSIA
18. Xavier Sun, Project Manager, Taiwan Watch Institute, TAIWAN
19. Julián Casasbuenas G. - Colnodo / Red de Desarrollo Sostenible, COLOMBIA
20. Satish Sinha, Associate Director, Toxics Link, IINDIA
21. Fernando Bejarano G. Centro de Análisis y Acción en Tóxicos y sus Alternativas (CAATA)/ MEXICO
22. Shahriar Hossain, Ph.D. Ecologist, Journalist & Social Justice Advocate, Environment and Social Development Organization (ESDO), BANGLADESH

INDIVIDUAL SIGNERS:

NOTE: Institutions given for identification purpose only

1. Mohamed F Jeebhay, MBChB, MPH (Occ Med), PhD, Head of Department and Director, School of Public Health and Family Medicine, Faculty of Health Sciences, University of Cape Town, SOUTH AFRICA
2. Philip J. Landrigan, MD, MSc, FAAP, Dean for Global Health, Arnhold Institute for Global Health; Professor of Preventive Medicine & Pediatrics, Icahn School of Medicine at Mount Sinai, New York, USA; President, Collegium Ramazzini

3. David R. Boyd, Ph.D., J.D., Adjunct Professor, Resource and Environmental Management, Simon Fraser University, Burnaby, BC, CANADA
4. Bruce Lanphear, MD, MPH, Professor, Faculty of Health Sciences, Simon Fraser University, Burnaby, BC, Canada; council member, International Society for Children's Health and the Environment
5. Colin L. Soskolne, Ph.D., Professor emeritus, University of Alberta, Canada; Adjunct Professor, Faculty of Health, University of Canberra, Australia; Fellow, American College of Epidemiology; Fellow, Collegium Ramazzini; Past-Chair, International Joint Policy Committee of the Societies of Epidemiology
6. Dr Jukka TAKALA, Adjunct Professor, DSc, MSc, BSc, Singapore; Director emeritus of ILO/SafeWork and EU-OSHA; President, International Commission on Occupational Health

¹ Presentation by Dominion Colour Corporation, CHEMCON CONFERENCE, THE AMERICAS 2014, **“REACH Authorisation Application for PY.34 and PR.104: Process and Lessons Learned”**, Slide 13: **“Are these pigments needed in the EU? YES - Allows SME to compete in exports to non EU countries.”**