

A conversation with IPEN, May 19, 2019

Participants

- Bjorn Beeler – General Manager & International Coordinator, IPEN
- Dr. Sara Brosché – Global Lead Paint Elimination Campaign Manager, IPEN
- James Snowden – Senior Research Analyst, GiveWell

Note: These notes were compiled by GiveWell and give an overview of the major points made by Mr. Beeler and Dr. Brosché.

Summary

GiveWell spoke with Mr. Beeler and Dr. Brosché of the International Persistent Organic Pollutants Elimination Network (IPEN) as part of the second round of investigating applicants to the 2019 GiveWell Grants for Global Health and Development in Southeast Asia and Bangladesh (<https://www.givewell.org/research/grants-southeast-asia-bangladesh-2019/application-details>). Conversation topics included IPEN's work on lead paint, case studies of its lead paint regulation campaigns, other international organizations working on lead paint, and IPEN's room for more funding.

IPEN's work on lead paint

From the 1960s to 1980s, most Western nations (e.g. US, Australia) enacted regulations on lead paint. However, approximately 67% of countries do not currently regulate lead paint in any capacity. Additionally, some countries have only restricted paint with very high levels of lead, despite the fact that paint should contain less than 100 parts per million of lead in order to be considered a safe product.

IPEN is currently involved with 20-25 lead paint regulation campaigns in a number of African, Asian, Latin American and Eastern Europe/Central Asian countries and at various stages of development (e.g. early discussions, consistent activities). IPEN's campaigns have sometimes involved adjusting existing but ineffective regulations (e.g. campaign in India).

Organizational structure

IPEN is a global network of organizations focused on reducing the prevalence of toxics, including lead paint. Its leadership consists of a General Assembly, Steering Committee, and Executive Committee (including two Co-Chairs). Partners (called "Participating Organizations") are responsible for setting IPEN's priorities and electing a Steering Committee and Co-Chairs to pursue those priorities.

Staffing structure for lead paint regulation campaigns

IPEN's lead paint regulation campaigns can involve a variety of staff, including:

- Global campaign manager (Dr. Brosché)

- Communications staff
- IPEN Regional Hubs staff (for follow-up activities such as translation)
- Local colleagues (e.g. for the campaign in the Philippines, one part-time and one full-time employee based locally)
- Subcontractors (typically for larger campaigns)

IPEN aims to spend a maximum of 25-30% of its budget for lead paint regulation work on internal operations, with the intention of directing the large majority of funding to in-country partners for direct activities.

Partnerships with local organizations

IPEN's national-level work on lead paint regulation largely involves supporting in-country partners rather than directly engaging with policymakers or other stakeholders. Partner organizations are often involved in a variety of other issues and view lead paint regulation as a broader strategy for raising awareness of toxics.

Development of campaigns with partners

IPEN's lead paint regulation campaigns are typically driven by NGO partners rather than requests from external donors. When it has more funding available, IPEN solicits work proposals from the network, e.g. during the annual International Lead Poisoning Prevention Week of Action. Campaigns may also result from IPEN identifying specific opportunities and connecting with relevant partners that had formerly expressed interest in lead paint regulation.

Instead of making demands or unilateral decisions, IPEN collaborates with its partners to develop campaign strategy. It typically provides partners with a general framework, although strategies are adjusted based on a partners' suggestions for navigating local context (e.g. lack of press freedom).

Communications with partners

IPEN communicates frequently with partners to understand local context and provide necessary assistance. During the more intensive phase of a campaign, IPEN exchanges emails (its primary mode of communication because of unstable internet and phone connections) with partners multiple times a week, while a less intensive phase may only require communicating every two weeks or every month.

Follow-ups are also conducted where needed using online tools such as Zoom, Skype and other.

Campaign approach

Emphasis on raising and maintaining awareness

Instead of convincing policymakers of the damage caused by lead paint (which is already widely acknowledged), IPEN's work mostly involves raising awareness that lead paint is an issue in a particular country, and ensuring lead paint regulation is prioritized. Most low-income countries are engaged with a number of public health and development issues (e.g. malaria, HIV/AIDS), making it difficult for lead paint regulation to remain a high priority for policymakers. To ensure that action is taken,

IPEN's campaigns emphasize continued awareness-raising among different stakeholders. Specific strategies include:

- **Generation and public dissemination of evidence** – IPEN's first step in building momentum for regulation is to generate and publicly disseminate local evidence on lead paint. For example, after IPEN publicly released results from a study in Sri Lanka demonstrating the availability of lead paint, local pediatricians began publishing articles condemning the government for its inaction. The increased public awareness and discussion exerted pressure on government, which then enacted lead paint regulation. Without evidence and public awareness, internal government stakeholders would find it difficult to make a strong case for prioritizing lead paint regulation.
- **Customer and industry mobilization** – Although the typical consumer is unable to exert pressure directly on government, they can influence policy through purchasing decisions. For example, if a media campaign causes people to begin asking for lead-free paint at local stores, paint manufacturers that produce lead-free paint will begin to receive a larger market share. A coalition of manufacturers can then be mobilized to request that the government enact regulations in order to ensure fairness across the industry.
- **Collaboration and engagement with industry** – Industry does not often directly oppose lead paint regulation but is typically more concerned with potential costs for paint reformulation. IPEN's partners engage directly with industry stakeholders, providing technical support and ensuring that industry is involved in the process for developing national regulation. IPEN has found that some paint manufacturers, after understanding the harmful nature of lead paint, begin independently reformulating their products.

Governments have publicly and privately acknowledged that lead paint regulation would not have been enacted without IPEN's campaigns.

Lack of resources for follow-up evaluation

IPEN has been unable to consistently conduct follow-up studies to evaluate the effects of its national-level campaigns for lead paint regulation, except in a select few projects that received sufficient funding. Follow-up studies typically cost IPEN approximately \$5,000, and when it has limited resources, it prioritizes the allocation of available funding to campaign activities—specifically in countries where no action on lead paint has yet been taken. Ideally, IPEN would like to always conduct studies of lead paint both before and after regulations have been passed.

Lead Safe Paint® certification

Paint producers around the world often seek third-party verification for lead-free paints in order to ensure customer trust. In 2015, upon realizing that no third-party service was available, IPEN worked with the Philippine Association of Paint Manufacturers to develop the Lead Safe Paint® certification. Approximately 80% of paint produced in the Philippines, accounting for small businesses, is now Lead Safe Paint® certified. Paint producers in Sri Lanka and Bangladesh also currently utilize

the Lead Safe Paint® certification, and producers in Mexico have expressed strong interest.

The Lead Safe Paint® certification is managed by SCS Global Services. IPEN does not generate revenue from or incur costs for certification.

Case studies of IPEN's lead paint regulation campaigns

Successful lead paint regulation in Ethiopia

Initial study

As part of an agreement with the UN Environment Programme (UNEP) for studies of lead paint in nine countries, IPEN and its in-country partner jointly conducted a study in 2013 demonstrating that paint with dangerous levels of lead was widely available in Ethiopia. IPEN was responsible for providing protocols and materials to its partner, which then collected paint samples and submitted them for testing.

Core campaign

Although the Ethiopian government and other stakeholders were alarmed by the initial study's findings, IPEN was unable to move forward with a campaign until it received significant, multi-year grant funding from the Global Environment Facility (GEF) in 2015—at which point IPEN's in-country partner conducted a larger study of lead in solvent-based paints from all brands in Ethiopia.

Results from the second study were used to raise awareness and build a coalition of stakeholders, the most important of which were the Ministry of Environment, Forest, and Climate Change and a large and influential paint manufacturer in Ethiopia. IPEN's partner also connected with health professionals and other civil society groups to raise awareness.

Approval and passage of legislation

Ethiopia's lead paint regulation was drafted by a government-formed group, with technical support from IPEN's partner. The draft legislation was then sent to other ministries for approval and finally to Ethiopia's Council of Ministers for adoption. In 2018, Ethiopia enacted its lead paint regulation, which is one of the strongest in the world.

Enforcement of legislation

Paint manufacturers in Ethiopia are required to apply for a license. The newly enacted regulation now also requires that licensing applications include proof that paints are being produced without lead. This process is relatively straightforward, as the Ethiopian paint industry includes only 8-10 producers. In the Philippines, which has a fragmented paint industry of very small producers, IPEN needed to conduct a series of studies to ensure that every available brand of paint was complying with the national regulation.

Follow-up evaluation

IPEN was able to conduct a follow-up evaluation of lead paint in Ethiopia at the end of its GEF-funded project in 2017. Although the nation had not yet enacted a regulation, the study demonstrated that a downward trend of lead in paint was already occurring.

IPEN has not been able to conduct an additional evaluation since the passage of regulation in Ethiopia.

Importance of industry support to the campaign in Ethiopia

IPEN believes that one of the core contributors to the success of its lead paint regulation campaign in Ethiopia was the support of industry. One key paint manufacturer began reformulating its paint prior to the passage of regulation—which, due to its size and influence, signaled to other producers that lead should not be used in paint. Furthermore, paint manufacturers in the nation understood that the government was beginning to take action on lead paint and that commencing an early transition to lead-free paint would be advantageous.

Challenges with campaigns in Cameroon, Indonesia, and Thailand

Lack of sustained interest in Cameroon

Although IPEN has found that sustained funding directed to in-country partners typically results in the passage of a lead paint regulation, the process can sometimes be slower and more complicated.

IPEN's lead paint regulation campaign in Cameroon began with a study of lead in available paints and dissemination of the results to the government and through media outlets. However, the initial interest of Cameroon's Ministry of Environment, Nature Protection and Sustainable Development (MINEPDED) could not be sustained over longer periods of time.

Ultimately, after multiple attempts to engage with MINEPDED, IPEN's partner found that the nation's Ministry of Public Health was a stronger and more consistent champion of lead paint regulation. After a couple of years' collaboration on this issue, Cameroon adopted a strong regulatory limit on lead in all types of paint in Cameroon in 2018.

Unanticipated events in Indonesia

IPEN has been consistently conducting a small lead paint regulation campaign in Indonesia since 2012. Since the campaign's launch, the nation has experienced multiple natural disasters and changes in government—which has slowed the passage of regulation.

Industry resistance in Thailand

Through a 3.5 year grant from EuropeAid for projects in eight Asian countries, IPEN conducted a lead paint regulation campaign in Thailand from 2012 to 2016 (initial paint studies were conducted prior to the campaign launch). At the outset of the

campaign, local industry stakeholders expressed strong resistance to lead paint regulation. However, over time, industry began engaging more with Thailand's Ministry of Public Health and ultimately supported the passage of a regulation.

IPEN is unaware of continued industry opposition against any of its in-country partners over long periods of time.

Other international organizations working on lead paint

IPEN and its partners are largely responsible for direct activities related to national lead paint regulation. International agencies such as the World Health Organization (WHO), UNEP, and the US Environmental Protection Agency provide a global framework for lead paint policy and raise awareness of lead paint at the global level. They also conduct workshops on a regional level. These organizations are based on consensus of member states.

WHO database for lead paint regulation

Every year, WHO requests information on lead paint regulation from national ministries of health in order to compile a database. IPEN has its own internal database on lead paint regulations around the world based on information from its country partners, which also includes an assessment of the protectiveness of the regulation (e.g. are the allowed limits low enough, it is enforced, etc). Because of their different set-ups and sources of information, the two databases sometimes contradict each other. IPEN believes its own internal list of policy changes is more likely to be correct than the WHO database when they contradict each other since IPEN's list is based on reports from their partnering organizations working on the issue, whereas WHO's database is generally based on reports from Ministries of Health, which in some cases are not responsible for this issue and hence may be less familiar with it.

Cross-collaboration with IPEN

IPEN's partners are often able to provide international organizations such as WHO or UNEP with national-level context, which can then be referenced at large conferences or events on lead paint and other toxics issues.

IPEN's partners are able to reference material from international organizations when making the case for national lead paint regulations, although the value of these references is limited at this initial stage. At a stage when governments are already beginning to draft regulations, however, IPEN has found that the model law for lead paint regulation—developed by UNEP in support of the Global Alliance to Eliminate Lead Paint—can be highly useful, particularly for governments that may have weak existing regulatory frameworks.

Room for more funding

Use of additional funding

Funding is IPEN's main constraint to increasing the scale of its work on lead paint regulation. Additional funding can be easily absorbed and immediately directed to in-country partners for national campaigns. For example, IPEN conducted a study of lead paint in Thailand in 2009 but was unable to move forward with a targeted campaign until it secured funding in 2012.

Allocation of funding

IPEN is committed to allocating funding to work on lead paint regulation, which is one of its priority program areas. It is generally able to transfer unrestricted funding between programs based on its priorities.

Level of funding necessary for success

When it is unable to raise sufficient funds from donors, IPEN may only be able to provide in-country partners with funding for a small media campaign or study of lead in paint. However, it has found that in order to achieve significant success, partners require consistent funding that enables a scale-up of operations and the hiring of dedicated campaign staff.

IPEN has achieved significant efficiency in conducting lead paint regulation campaigns, typically incurring an all-inclusive cost of \$50,000 per year of a campaign.

*All GiveWell conversations are available at
<http://www.givewell.org/research/conversations>*