

Environmental Management (Prohibition of Lead in Paint and  
Coating Materials) Regulations, 2026

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IT is hereby notified that the Minister of Environment, Climate, and Wildlife has, in terms of section 140 of the Environmental Management Act [Chapter 20:27], made the following regulations:—

*Title*

1. These regulations may be cited as the Environmental Management (Prohibition of Lead in Paint and Coating Materials) Regulations, 2026.

*Interpretation*

2. In these regulations—

“authorised officer” means any person designated in writing by the agency, or by another competent authority acting in coordination with the agency, to perform inspections or other enforcement functions in terms of these regulations;

“coating material” means a product, in liquid, paste or powder form, which, when applied to a substrate, forms a layer possessing protective, decorative and or other specific properties;

“manufacturer” means any person who undertakes the physical or chemical transformation of substances into a new product, performed either by power-driven machines or by hand, and markets this new product under his or her name, trademark or private label;

“material change” means a change to the design, manufacturing process, or source of component parts, for the paint or similar coating material, which the manufacturer or importer, exercising due care, knows or should know affect compliance with the permissible lead concentration;

“lead” means elemental lead and any compound containing lead that may release lead ions;

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“paint” means a pigmented coating material which, when applied to a substrate, forms an opaque dried film having protective, decorative or specific technical properties;

“person” includes any natural or legal person, enterprise, manufacturer, importer, distributor, or retailer;

“product family” means a group of paints or coating materials that share the same base formulation and raw materials, and differ only in non-substantive characteristics such as tint concentration or quantity (colour variations created from the same pigment, differing in amount) or pack size;

“total lead content” means the total concentration of lead in a product, expressed as elemental lead (PB), measured in parts per million (PPM) by dry weight.

*Application*

3. These regulations apply to the manufacture, sale, distribution, import and export of all paints or similar coating materials intended for use in residential, commercial, institutional, industrial, or artistic applications.

*Permissible lead concentration*

3. The total lead concentration applicable to paints or coating materials must not be more than 0.009 *per centum* (90 ppm) or 90 mg/kg total lead (calculated as lead metal), based on the weight of the total non-volatile content of the paint or weight of the dried paint film.

*Compliance obligations*

4. (1) Every manufacturer or importer of paint or coating materials shall before commercial distribution and importation—

- (a) ensure that all products comply with the 90ppm total lead content limit;
- (b) conduct testing of representative product formulations or product families, as referred to in section 4 for the first production or importation batch, provided that the

manufacturer or importer maintains documentation showing how the tested formulation represents the family, as specified in the First Schedule;

- (c) in the event of a material change, use one of the testing methods as specified in the Second Schedule, or another method approved in writing by the Agency; and maintain documentations demonstrating how tested formulations represent covered products in accordance with the First Schedule;
- (d) issue a declaration of conformity corresponding with the form specified in the First Schedule for each product or, where justified, for a product family covered by a representative test as provided paragraph (b) and maintain such documentation for a period of not less than five (5) years. Such declarations shall be submitted in English, unless the Agency provides written authorisation for submission in another language;
- (e) in coordination with other competent authorities, the Agency arrange for translations of declarations of conformity into local languages to support public awareness and compliance;
- (f) make such declarations and supporting test results available to the agency upon request;
- (g) make such declarations available on their website;
- (h) the compliance declaration certificate must be made available immediately following the effective date of these regulations and in the event of a material change, every manufacturer and importer must submit such certificate within three months of the change.

(2) Every importer of paint or coating materials may rely on a foreign manufacturer's test results to issue its own declaration of conformity.

(3) Every importer relying on a foreign manufacturer's test results under sub-paragraph shall—

- (a) exercise due care to ensure the manufacturer's test results meet the requirements of these regulations; and

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- (b) obtain records of the laboratory test results and attestations, containing sufficient information on how the testing was conducted.
- (4) Paint containers shall be clearly labelled with—
  - (a) the name and address of the manufacturer or importer;
  - (b) a statement confirming that the product complies with the 90ppm lead content limit; and
  - (c) a batch number or production code traceable to the declaration of conformity.

*Enforcement*

6.(1) The Agency shall be responsible for monitoring compliance and enforcing these regulations.

(2) The Agency or any authorised officer may, at any reasonable time—

- (a) inspect any premises where paint or coating materials are manufactured, stored, or sold;
- (b) take samples of products for the purpose of testing; or
- (c) request documentation and test results from any manufacturer or importer.

(3) Where appropriate the Agency may coordinate enforcement actions with other competent authorities, such as Ministry of Health and Child Care and the Consumer Protection Commission and may exchange information and conduct joint inspections where appropriate.

*Offences and penalties*

7. Any person who contravenes these regulations shall be liable to specific penalties, which may include—

- (a) a fine of up to level 14 or imprisonment of up to one (1) year or both;
- (b) suspension or revocation of licences or permits;
- (c) seizure or recall of non-compliant products.



*Supersession of prior provisions*

8. Notwithstanding anything contained in any other enactment, these regulations shall have overriding effect with respect to the regulation of lead content in paints and coating materials.

*Transitional provisions*

9. (1) These regulations shall come into operation one year from the date of publication and shall apply to all products manufactured, imported, or offered for sale.

(2) Manufacturers and importers shall comply with these provisions within a six-month grace period from the date of publication.

(3) After the period specified in subsection (2), all non-compliant products shall be withdrawn from the market.

FIRST SCHEDULE (Section 5)

*Suggested testing methods for total lead content*

For the purpose of determining compliance with the total lead content limit established in section 3 of these regulations, any of the following internationally recognised testing methods may be used:

*A. Wet Chemistry Methods*

1. ISO 6503: Paints and varnishes — Determination of total lead content — Flame atomic absorption spectrometric method.
2. ASTM D3335: Standard Test Method for Low Concentrations of Lead in Paint by Atomic Absorption Spectroscopy.
3. US EPA SW-846 Method 3050B: Acid digestion of sediments, sludges, and soils (used in combination with Method 6010 or 7000 series for detection).
4. ISO 3856-1: Paints and varnishes — Determination of “soluble” metal content — Part 1: Determination of lead content — Flame atomic absorption spectrometric method and dithizone spectrophotometric method.

*B. Instrumental Methods*

1. ISO 11885: Water quality — Determination of selected elements by inductively coupled plasma optical emission spectrometry (ICP-OES).

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2. USEPA Method 6020B: Inductively coupled plasma-mass spectrometry (ICP-MS).
3. US EPA Method 7000B: Flame atomic absorption spectrophotometry.
4. X-Ray Fluorescence (XRF): Provided the method is calibrated against a wet chemistry method and the sample matrix is validated.
5. NIOSH Method 7303: Analysis of Elements in Bulks by Inductively Coupled Plasma Optical Emission Spectroscopy (ICP-OES)

### Notes:

- Laboratories conducting tests should be accredited to ISO/IEC 17025 or a nationally recognised equivalent standard.
- Test results must be traceable to the paint formulation batch number.
- The Environmental Management Agency may issue additional guidance or specify preferred methods in line with available national laboratory capabilities.

### SECOND SCHEDULE (Section 5)

#### *Declaration of conformity template*

Manufacturer or importer's logo

Certificate of Compliance Declaration in terms of Environmental Management (Prohibition of Lead in Paint and Coating Materials) Regulations, [Year]

I \_\_\_\_\_ (person in charge of the paint and coating materials manufacturing or importing company) hereby certify that the following paint and coating materials including, where applicable, product families sharing an identical base formulation and differing only by tint concentration or pack size, (manufactured or imported [select]) by, \_\_\_\_\_ (the trade name and physical address of the manufacturer or importer), are in compliance with the prescribed 0.009 percent (90 ppm) or 90 mg/kg total lead limit (calculated as lead metal), based on the weight of the total non-volatile content of the paint or weight of the dried paint film.

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| Paint or coating material product family | Paint or coating material product name | Pigment/tinting system | Production date | Batch code |
|------------------------------------------|----------------------------------------|------------------------|-----------------|------------|
|                                          |                                        |                        |                 |            |
|                                          |                                        |                        |                 |            |

I further affirm that the above-mentioned information is to the best of my knowledge true, correct and complete.

\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Full name of the person in charge of the paint and coating materials manufacturing or importing company)

Date: \_\_\_\_\_

