



**July 2021**

Dedicated to improving public health through innovative strategies to reduce hazards in communities around the world.

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# Occupational Knowledge International

[www.okinternational.org](http://www.okinternational.org)

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## Environmental Organizations Tell Investment Banks to Avoid Clarios IPO

### The World's Largest Lead Battery Company told to Invest in Pollution Controls

OK International spearheaded an international coalition of environmental organizations including **Earthjustice, Greenpeace and the Sierra Club** to write to the CEOs of the largest investment banks demanding that they not participate in the planned initial public offering (IPO) of Clarios, the world's largest lead battery maker. In 2019 the company was sold for \$13 billion dollars by Johnson Controls to Brookfield Business Partners LP, a Canadian private equity firm. The firm announced that they plan to take the lead battery company public for an anticipated \$7 billion-dollar profit this summer.

The organizations sent a letter to the CEOs of **Goldman Sachs, Citigroup, Bank of America, JP Morgan Chase** and other investment banks telling them not to underwrite the IPO until the company upgrades all its facilities around the world (including their Mexican facilities and joint ventures in India and elsewhere) to meet, at a minimum, U.S. standards for ambient air emissions, stack emissions, water effluent and occupational exposure limits.

Clarios recently closed its newest and only U.S. recycling plant in South Carolina and laid off hundreds of workers. The company is expected to increase shipments of used lead batteries to their antiquated Mexican recycling facilities that have greater environmental emissions.

OK International recently obtained export records under the US Freedom of Information Act (FOIA) from the US Environmental Protection Agency (EPA) showing that the company was largest hazardous waste exporter responsible for 73% of used lead batteries shipped to Mexico in 2020. The company admitted in their IPO filing that their Mexican recycling plants "operate at a cost basis of 70% less" than other recycling options on a per ton basis.

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## Bringing Safer Mining Practices to Cameroon

Despite challenges of implementing projects during the Covid pandemic, we were successful in working with our partners at the Centre de Recherche et d'Éducation pour le Développement (CREPD) in piloting a safer mining program in a gold mining community in Eastern Cameroon.

With funding from the Conservation, Food and Health Foundation and the American Industrial Hygiene Association we completed a demonstration project in Eastern Cameroon to reduce exposures in ore processing with the use of wet spray misting equipment.

Artisanal and small-scale gold mining continues to grow in Cameroon. At the same time, there is a shift from mining alluvial deposits around rivers to underground hard rock deposits. This requires the ore to be brought to the surface and processed to a very fine flour like consistency. Grinding and milling ore releases dust containing hazardous metals and silica.

All miners are exposed to silica dust – a risk factor for silicosis and Tuberculosis (TB). Women and children are the most susceptible to the hazards of lead, mercury, and arsenic and make up the majority of the labor involved in processing gold ore. We plan to continue this work with an aim to expand the demonstration site to include several more crushing and grinding machines and to utilize this site to train other miners and government officials.



Water spray misting installed at ore processing machine.

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## World Bank Artisanal Small-Scale Mining (ASM) Report Falls Short

The World Bank issued the “2020 State of the Artisanal and Small-Scale Mining Sector Report” in May that failed to address the most significant public health concerns with this growing hazardous enterprise. Although a full chapter was devoted to Occupational Health and Safety, the document is silent on risk factors responsible for the majority of the morbidity and mortality among small-scale miners and ignores the available evidence regarding opportunities to reduce these exposures

The International Commission on Occupational Health (ICOH) is an international non-governmental professional organization wrote to the Bank to express these concerns. The letter outlined the omissions in the report and asked for an addendum to address these issues. The letter from ICOH stated that “we believe it is important to present a complete view of the hazards in small-scale mining and the opportunities for improving this sector. Unfortunately, the “State of the sector” report falls short of this goal.”

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## **CDC Advisory Committee Calls for Revising Blood Lead Reference Level**

The Centers for Disease Control and Prevention (CDC) Lead Exposure and Prevention Advisory Committee (LEPAC) in a meeting on May 14<sup>th</sup> recommended that the agency revise the blood lead action level for children from 5.0 ug/dl to 3.5 ug/dl. The reference level is intended to be used to prioritize children with exposures in excess of background blood lead levels among children in the U.S. The agency recommends that environmental investigations be conducted to identify potential sources of lead exposure be conducted when a child under exceeds the reference level. Laboratory reporting forms and doctors generally rely on the CDC guidelines when informing parents of blood lead test results.

The blood lead reference level is not a regulatory standard but state and local governments may elect to follow the agency's guidance. In recent years, many states including Maryland, Illinois, New York, Maine, and New Hampshire have adopted legislation requiring investigations for children at or below the CDC action level. The U.S. Department of Housing and Urban Development have also revised their regulations in recent years to adhere to the CDC guidelines for children residing in HUD associated housing. However, since the CDC lowered its reference level almost ten years ago, most States have not yet updated their definition of an elevated blood lead to reflect current guidance.

The need to update the reference level is the subject of an editorial authored by Perry Gottesfeld that has been accepted for publication in the September edition of the American Journal of Public Health. The article "**Finding the Next Flint: The Need to Update the Blood Lead Reference Value**" argues that the level must be lowered to identify vulnerable communities with the highest lead exposures. The persistent disparity in blood lead levels among minority and low-income communities underlines the need to update the blood lead reference value to identify and respond to over-exposed populations.

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## **Court Orders Revised Lead Paint, Dust and Soil Standards**

In May, the U.S. 9th Circuit Court has instructed the EPA to revise the lead paint, soil and dust standards that apply to lead in housing. Although the dust lead standards have been lowered in recent years, the standards for paint and soil that pertain to residential structures have not been updated in more than 20 years. The court noted that EPA's definition of lead-paint much higher than the Consumer Product Safety Commission's (CPSC) definition of 90 ppm for new paints.

The court's decision relied on the fact that all levels of lead are harmful to human health. For additional information see: [https://earthjustice.org/sites/default/files/files/19-71930\\_documents.pdf](https://earthjustice.org/sites/default/files/files/19-71930_documents.pdf)

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## **Elevated Blood Lead Levels Persist in U.S.**

In a study published earlier this year, the CDC reported that 385,775 children in the US (ages 1–11) had blood lead levels greater than or equal to the current CDC blood lead reference value of 5 ug/dl. In addition, higher blood lead levels are associated with non-Hispanic Black children, lower income families and the older housing. The racial disparities noted in blood lead levels have been persistent for decades. Overall blood lead levels among children in the U.S. have been reduced substantially in recent decades. For additional information see:

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## Undisclosed Conflicts of Interest: Influence of Lead Industry

In advance of its IPO (see related story above), the lead battery maker **Clarios** has made large grants to UNICEF and the U.S. NGO Pure Earth (AKA Blacksmith Institute) for lead poisoning prevention activities. In 2020, UNICEF and Pure Earth announced a three-year “partnership” and a financial grant from the Clarios Foundation reported to be in excess of \$6 million USD. The grant was announced on the same day that UNICEF and the NGO published “The Toxic Truth” a joint study on global lead poisoning, but they failed to disclose any potential conflicts of interest. After contacting the UN Agency, we have learned that unlike most academic journals, the organization has no policy requiring the disclosure conflicts of interest in their publications.

The UNICEF report places most of the blame on informal lead battery recycling and fails to call out the significant lead emissions from formal sector lead battery manufacturing and recycling plants around the world. It also failed to call for extended producer responsibility or take-back regulations to mandate that battery manufacturers take back used lead batteries for recycling.

At the time the report was released, OK International spearheaded efforts by 15 international NGOs that requested UNICEF to retract and correct some of the misleading statements in the report. After much discussion, the agency agreed to only change two sentences in the revised report posted online. Pure Earth also has a close working relationship with International Lead Association the major lead industry association of which Clarios is a member. In our dialogue with Unicef they have expressed no interest in adopting a policy to disclose potential conflicts of interest in technical publications, although this has become an accepted standard in scientific publications.

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## Hidden Cost of Electric Vehicles: Waste Lithium-ion Batteries

Global sales of electric vehicles rose 43% in 2020. In the push to promote electric vehicles to reduce greenhouse gas emissions and reduce health risks from vehicle emissions, few voices have emerged to question how the massive batteries required for this transition will be recycled. The newly announced electric Ford pickup truck has a lithium-ion battery that weighs more than 1,800 pounds (816 Kilograms). To help raise awareness of this growing problem, Perry Gottesfeld published an article in Undark Magazine describing the challenges of waste lithium-ion batteries.

The article notes that “None of the lithium-ion batteries in electric vehicles are recyclable in the same sense that paper, glass, and lead car batteries are.” The materials being extracted from these lithium-ion batteries are not useful for making new batteries but instead are generally



The article is available online at:

<https://undark.org/2021/01/21/electric-car-looming-recyclability-problem/>

exported to plants outside the U.S. where they are processed for lower quality uses. The article also notes that some low-income countries have provided incentives including tax waivers to import used hybrid and electric vehicles with these batteries while making no provision for collecting or recycling this waste. The full article is available online at:

<https://undark.org/2021/01/21/electric-car-looming-recyclability-problem/>

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## Production of Hazardous Quartz Countertops Shifts to Vietnam and India

Following the introduction of anti-dumping tariffs ranging up to 300% on US imports of artificial stone countertops from China in 2018, India and Vietnam have stepped up production to fill in the gap. Our research indicates that while US imports from China dropped by 99% since 2015, imports from India grew by 550% and imports from Vietnam by 300%.

Studies have documented that the production and installation of these countertops has been associated with a rapid onset of a severe form of silicosis among workers in Israel, China, Australia, U.S. and Spain. Many of these cases have led to progressive massive fibrosis (PMF), respiratory failure and many deaths among younger workers. The material also known as engineered or manufactured stone originated from an Italian company, but has been licensed to more than 50 producers around the world since the 1980s.

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