



### Frequently asked questions (FAQs)

1. Can paint be labelled as “lead-free” or “lead-safe”? No. Labels must not claim “lead-free” or “lead-safe” because trace amounts of lead (up to 90ppm) may still occur.

Following a 24-month grace period, all labels must be updated by 17 May 2026.

2. Then how can I show my customers that our products are compliant? Every paint product must carry the statement: “Complies with the South African legal lead limit of 90ppm or less.

” 3. Can XRF devices be used to test for lead in paint? A portable XRF (pXRF) is a handheld device that uses harmless X-rays to quickly check what elements are in a material. A pXRF can give an instant reading of whether lead is present and in what approximate amount. pXRFs are a valuable screening tool, but are not precise enough on their own for legal enforcement. For official confirmation, paint samples must still be tested in an accredited laboratory.

4. Do the regulations apply only to raw materials? No. Compliance is measured on the final paint formulation, so manufacturers must test the finished product, not just the inputs.

5. What testing is required for new reformulated products? The regulations require first batch testing of any newly reformulated product in a SANAS-accredited laboratory. If the formulation does not change, there is no requirement for repeated testing.

6. Can self-testing or supplier SDSs replace lab testing? No, the final product must be tested in a SANAS-accredited lab

7. Can manufacturers, retailers, or distributors sell old stock which contains lead content >90ppm? No, the manufacture, sale, import or export, of paint or coating materials with lead content >90ppm is prohibited after 17 May 2025

8. Will imported paints and coating materials also be checked for compliance? Yes, imported products will be subjected to the same requirements as domestic products.