



The Lead Education and Abatement Design Group Incorporated aims to eliminate lead poisoning globally and to ensure that the ecosystem is protected from lead in all its uses. **ABN 25 819 463 114**

OECD Guidelines to Multinational Enterprises:

The Case Against Innospec's Continued Sale of TEL for Leaded Gasoline / Leaded Petrol

Supplemental submission by Zac Gethin-Damon, End of Leaded Petrol by End of 2011 Campaigner, and Elizabeth O'Brien, President, The Lead Education and Abatement Design (LEAD) Group Inc. Reviewed by James Rochow, President, Trust for Lead Poisoning Prevention.

This submission is supplemental to the emailed Letter from Elizabeth O'Brien of The LEAD Group Inc, dated 27th August 2011; To: NCPs (OECD National Contact Points) of Switzerland, Australia, the United States and the United Kingdom; CC: Prof Hatfield; James Rochow of the Trust for Lead Poisoning Prevention; RE: **Mediation to end the sale of leaded petrol globally**

This petition is being submitted under the procedural auspices of *U.S. NCP PROCEDURES FOR SPECIFIC INSTANCES UNDER THE OECD MNE GUIDELINES* - JUNE 2011, at <http://www.state.gov/documents/organization/167188.pdf> and at the request of Alan Yu, US NCP, in an email and couriered letter sent: Saturday, October 01, 2011 5:07 AM [Australian Eastern Standard Time]. Please note that the US term 'gasoline' is used interchangeably with the English term 'petrol'.

Count I.

Statement of Facts and Applicable Policy

INTRODUCTION

By continuing the sale of the octane-enhancing additive, Tetra Ethyl Lead (TEL), to the following countries: Afghanistan, Algeria, Burma (Myanmar), Iraq, North Korea and Yemen,

In general terms: Innospec does not conform to Section VI of the OECD Guidelines - <http://www.oecd.org/dataoecd/43/29/48004323.pdf> - namely, *'in consideration of relevant international agreements, principles, objectives, and standards, take due account of the need to protect the environment, public health and safety'*

The need to 'protect the environment, public health and safety' from exposure to lead is clearly stated in documents from various UN sources. For example:

In April 2011, the United Nations Environment Programme's Partnership for Clean Fuels and Vehicles (UNEP PCFV) included the following link in their *Partnership Newsletter*, Volume 9 Issue 1:
http://www.unep.org/Transport/PCFV/PDF/leadEvaluation_summaryreport.pdf

The following, compelling reasons for immediately ending the era of leaded petrol, and ensuring the OECD does everything in its powers, urgently, given the timeframe, to stop Innospec adhering to its planned 2012 phaseout, in other words to phaseout TEL sales in 2011, are taken directly from that link:

'The estimated global annual impacts of lead in fuels were found [by Hatfield and Tsai in a report currently being peer-reviewed and expected to be published in 2011] to be significant:

- *Close to 1.1 million deaths;*
- *A loss of 322 million IQ points;*
- *Close to 60 million crime cases;*
- *Economic loss of USD 2.4 trillion per year (4% of global GDP)'*

To further demonstrate the implications of Innospec's continued sale of leaded petrol additive, we refer to the document; 'Myths and Realities of Phasing out Leaded Gasoline by the Alliance to End Childhood Lead Poisoning (AECLP) [predecessor to the Trust for Lead Poisoning Prevention],' published on the UNEP's PCFV website:

<http://www.unep.org/transport/pcfV/PDF/Pub-AECLP-Myths.pdf> - which stated in **1999**:

'Leaded Gasoline Phase-Out Is an Urgent Priority. Leaded gasoline causes more widespread human exposure to lead than any other single source. This is due largely to the dispersive nature of its use. When leaded gasoline is burned, extremely fine particles of lead compounds are emitted into the air, where they can remain suspended for weeks. These particles can travel significant distances and are absorbed very easily through the lungs.

Lead eventually falls out into soil and dust, creating a reservoir of lead that can pose a health hazard for decades, if not centuries, to come. Young children, who are most vulnerable to lead's harmful effects, ingest lead in dust and soil as a result of their normal hand-to-mouth behavior.

These three factors – the dispersive nature of leaded gasoline use, the ease with which

it enters the human body, and the particular vulnerability of children to lead's harmful effects – combine to make leaded gasoline phase-out a pressing international environmental health and sustainable development priority. The projected increase in global motor vehicle use and the legacy of lead in soil and dust that leaded gasoline leaves behind make its phase-out all the more urgent.'

The OECD in its Resolution of the Council Concerning the Declaration on Risk Reduction for Lead, created in February 1996 clearly outlines the priority of the phase out of lead as its objective; the very first point of the annex demonstrating the importance of a phase out of lead to the organisation:

a) Progressively phase-down use of lead in gasoline except where needed for essential or specialised uses for which there are no practical, viable alternatives;

Fifteen years is far too long for Innospec to be let continue to see TEL after the OECD has decided that a phase-down of lead in gasoline was one of its priorities.

In regards to the PCFV the cessation of the provision of TEL for automotive fuel was a primary reason for its creation in 2002. The PCFV's very first "partnership objective" outlines the significance of a lead-phase out to the partnership: *Assist developing countries in developing action plans to complete the global elimination of leaded gasoline (REF: pg. 2 <http://www.unep.org/transport/pcfV/pdf/InfSheet.pdf>)*

Nine years after the creation of the PCFV, there still remains six countries who continue to allow the sale of leaded petrol.

Other, non-UN sources, which demonstrate the environment, public health and safety benefits associated with a phase-out of leaded petrol:

http://www.worstpolluted.org/projects_reports/display/66 Blacksmith Institute (circa 2010): *Arguably the first and the most important global environmental health improvement to date has been the phase out of lead in gasoline.*

<http://www.ncbi.nlm.nih.gov/pubmed/2238697> Shy C.M, Lead in petrol: **The Mistake of the XXth century (1990)**: *Available data now show that lead in petrol at the scale of use in the 1970s produced significant environmental lead contamination and increased average blood-lead levels in the general population National sample surveys of blood-lead levels in the United States carried out annually from 1976 show a decreasing trend closely correlated with the use of lead in petrol.*

Relief Requested

As stated in The LEAD Group's letter of 27th August 2011, we request:

The OECD to mediate an end to the sale of the lead additive TEL by the end of 2011, as phase-out by 2012 is an unacceptable outcome. Innospec should buy back stocks of TEL

from the six countries. Remaining stocks of TEL should only be supplied to those OECD and non-OECD countries which have made exemptions under the Rotterdam Convention, to allow the use of TEL in aviation fuel (AvGas) in their country.

SPECIFIC PROVISIONS OF OECD GUIDELINES TO MULTINATIONAL ENTERPRISES (MNE) NOT ABIDED BY INNOSPEC

These provisions are contained in the section on the Environment, Section VI, already referred to above:

VI. That Enterprises should, within the framework of laws, regulations and administrative practices in the countries in which they operate, and in consideration of relevant international agreements, principles, objectives, and standards, take due account of the need to protect the environment, public health and safety, and generally to conduct their activities in a manner contributing to the wider goal of sustainable development.

The LEAD Group contends that Innospec is NOT taking due account of these factors.

Each clause of this section will be noted in *italics* and underlined. An explanation will follow those clauses which The LEAD Group contends are not being abided by Innospec, giving reasons for this contention.

Count II.

Statement of Facts and Applicable Policy

1. Establish and maintain a system of environmental management appropriate to the enterprise, including:

a) collection and evaluation of adequate and timely information regarding the environmental, health, and safety impacts of their activities;

We would suggest that if Innospec has been collecting and evaluating the environmental, health and safety impacts information of TEL for leaded fuel distributors, sellers, purchasers **and** the general community exposed to automotive emissions in the countries purchasing it (Algeria, Afghanistan, Iraq, North Korea, Myanmar (Burma) and Yemen) they would have come to the conclusion that their product was doing harm and this would have led to a forward movement in the planned cessation of supply of TEL to some years before the present.

Relief Requested

If such a collection and evaluation has been done by Innospec then we ask that the OECD request to see it. We'd appreciate the opportunity to read it.

Count III.

Statement of Facts and Applicable Policy

b) establishment of measurable objectives and, where appropriate, targets for improved environmental performance and resource utilisation, including periodically reviewing the continuing relevance of these objectives; where appropriate, targets should be consistent with relevant national policies and international environmental commitments;

Innospec's targets are not consistent with international environmental commitments. An international environmental commitment of particular significance which is not abided by Innospec is the OECD's Resolution of the Council Concerning the Declaration on Risk Reduction for Lead, February 1996

(Ref: [http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=C\(96\)42/FINAL&docLanguage=En](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=C(96)42/FINAL&docLanguage=En))

'Having regard to the conclusions of the meeting of the United Nations Commission on Sustainable Development in May 1994 concerning the health impact to humans exposed to lead in gasoline, and encouraging further efforts to reduce exposure of humans to lead in gasoline (UN Economic and Social Council Official Records, 1994, Supplement No. 13, pp 32-34);'

The fact that a phase out of lead in gasoline is the first point in the annex indicates the importance of such a phase out to the OECD:

'a) Progressively phase-down use of lead in gasoline except where needed for essential or specialised uses for which there are no practical, viable alternatives;'

(Ref: [http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=C\(96\)42/FINAL&docLanguage=En](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=C(96)42/FINAL&docLanguage=En))

Relief Requested

That no reason stand in the way of phase-out of leaded gasoline by the end of 2011, as 15 years is already way too long for a priority phase-down to occur.

Count IV.

Statement of Facts and Applicable Policy

c) regular monitoring and verification of progress toward environmental, health, and safety objectives or targets.

As has been shown, TEL as a fuel additive has detrimental environmental, health and safety impacts which cannot, when used in automobiles, be avoided.

Relief Requested

Therefore progress towards environmental, health and safety objectives for Innospec means a **continued** phase-out of TEL; without doing this Innospec is not abiding by the MNE quoted above [c)].

Count V.

Statement of Facts and Applicable Policy

2. Taking into account concerns about cost, business confidentiality, and the protection of intellectual property rights:

a) provide the public and workers with adequate, measureable and verifiable (where applicable) and timely information on the potential environment, health and safety impacts of the activities of the enterprise, which could include reporting on progress in improving environmental performance; and

b. engage in adequate and timely communication and consultation with the communities directly affected by the environmental, health and safety policies of the enterprise and by their implementation.

The LEAD Group has not found any statement from Innospec that they have done so in the six countries still using leaded petrol. By comparison a plethora of information on this topic has been published since the early 1970s for instance; Health Effects of Environmental Pollutants Waldbott, G. L. C. V. Monsby 1973 ; An American study of the physical effects of air pollution , discussing in some detail the effects of various substances including that of lead Ref: Lead Pollution from Motor Vehicles 1974-86 A select Bibliography; Compiled by Penny Farmer 1987 Technical Communications by Elsevier Applied Science Publishers London and New York.

Relief Requested

The LEAD Group requests the OECD investigate what evidence is there that Innospec has provided the public and workers with the above-mentioned information, communication and consultation? We'd be particularly interested to read the verified English translations of such materials.

Count VI.

Statement of Facts and Applicable Policy

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3. Assess, and address in decision-making, the foreseeable environmental, health, and safety-related impacts associated with the processes, goods and services of the enterprise

over their full life cycle with a view to avoiding or, when unavoidable, mitigating them. Where these proposed activities may have significant environmental, health, or safety impacts, and where they are subject to a decision of a competent authority, prepare an appropriate environmental impact assessment.

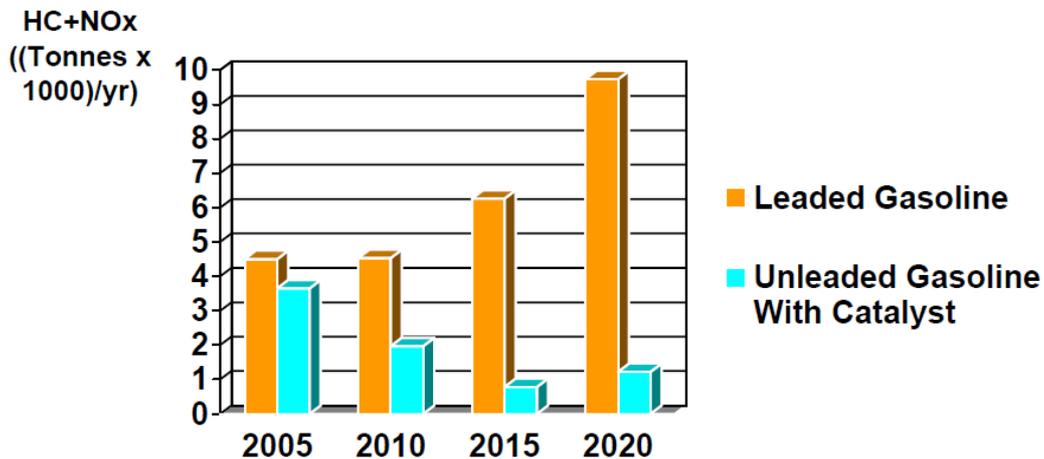
The environmental, health and safety-related impacts of TEL to distributors, sellers, purchasers and the general community exposed to automotive emissions in the remaining 6 countries purchasing it could be avoided by ceasing the sale of TEL.

Innospec's reasons for continuing the sale of a substance which is universally understood as having such unavoidable detrimental impacts are inaccurate, even deceptive.

Innospec states on its website that *"the economies of some countries continue to depend on this product. They do not have cars with catalytic converters capable of running on unleaded fuel so TEL remains by far the most cost-effective octane enhancer available"* Innospec webpage on Octane Additives (Ref: <http://www.innospecinc.com/octane-additives.html>).

Whereas Innospec claims that: *"the economies of some countries continue to depend on this product"* and *"TEL remains by far the most cost-effective octane enhancer available"*, in fact, leaded petrol carries a huge cost to any national economy, as noted above (Hatfield and Tsai 2011). Although it is possible that the lead additive TEL is cheaper in raising octane from X to Y level per litre of fuel than other non-leaded additives available on the market, the statement by Innospec leaves out the immense costs associated with the use of leaded petrol. Not only does lead in petrol cause death, reduction in lifetime earnings due to lowered IQ and increased crime, the use of leaded petrol stops a national government from being able to require that vehicles be equipped with catalytic converters. The following figure from 'The Case for Banning Lead in Gasoline' by Manufacturers of Emission Controls Association (MECA) 2003, [http://www.meca.org/galleries/default-file/lead0103_\(final\).pdf](http://www.meca.org/galleries/default-file/lead0103_(final).pdf), shows the huge amounts of Hydrocarbon (HC) and Oxides of Nitrogen (NOx) pollution which could be avoided if leaded petrol were banned from January 1st 2005. As the figure shows, an installation of catalytic converters possible only through the use of unleaded fuel, the use of leaded fuel in a car with a catalytic converter poisoning the catalytic converter and rendering it useless, will also greatly reduce HC and NOx emissions. Obviously HC and NOx pollution carry their own health costs e.g. increased asthma rates and lost work time, apart from the health costs of leaded petrol.

Figure 1. Unleaded Gasoline for Imported Pre-Owned Light-Duty Vehicles with Emission Control Catalysts Will Avoid Huge Amounts of Pollution



Assumptions: 1. Unleaded Available Jan. 1, 2005
 2. 2005 LDV Fleet of 100,000
 3. LDV Sales of 10,000/yr @1.08 Growth; Scrap 10,000 LDV/yr; Life of 10 yrs
 4. Baseline Leaded Gasoline Emissions of 1.5 g/mi HC, 2.5 g/mi NOx, 16 g/mi CO

Innospec’s attempt to confuse and mislead existing customers through the statement of their website as mentioned above is further demonstrated through the following examples of facts taken from the PCFV’s info sheet;

<http://www.unep.org/transport/pcfV/pdf/InfSheet.pdf>

- *vehicle fleets in developing countries can, in general, switch from leaded to unleaded fuel without any need for additives or adjustments;*
- *emission-reduction technologies are widely available, like catalytic converters and technology to reduce sulphur and particulate emissions;*
- *in many areas at present, unleaded fuel is cheaper and/or more widely available than leaded fuel;*
- *modern engine technology is becoming standard in developed countries and is slowly spreading to developing countries;*
- *increasingly, vehicles – both new and second-hand – that are equipped with catalytic converters are being imported from western countries and Japan, and in these cases, only unleaded fuels must be used to gain the benefits.*

Breaking down the statement by Innospec further reveals the deception inherent within it.

‘They do not have cars with catalytic converters’ – We do not contest this statement.

However, it is true BECAUSE it is futile to import a car with a catalytic converter or to retrofit a catalytic converter to a car if unleaded fuel is not both available and

clearly marked as ‘unleaded’, in the marketplace. The use of leaded fuel in a car with a catalytic converter will poison the catalytic converter rendering it useless. The whole purpose of introducing unleaded petrol, which is labeled as such, into a marketplace is, in one action, to protect the population from lead exposure, AND allow the use of catalytic converters which reduce other automotive emissions.

‘They do not have cars with catalytic converters capable of running on unleaded fuel...’

This is a doubly deceptive statement, as it appears to be an attempt to say that a catalytic converter is necessary in order to run on unleaded fuel.

First, as stated above, catalytic converters are poisoned if they are run on LEADED fuel, so it’s just as well the countries in question *don’t* have cars with catalytic converters; secondly, cars *without* catalytic converters can run on both leaded and unleaded fuel.

...‘*so TEL remains by far the most cost-effective octane enhancer available*’- According to the PCFV; ‘vehicle fleets in developing countries can, in general, switch from leaded to unleaded fuel without any need for additives or adjustments’, so how can TEL be more cost effective than NO octane enhancer?

The PCFV states that; ‘in many areas at present, unleaded fuel is cheaper’. Even if Innospec could demonstrate that TEL is the most cost effective octane enhancer then the question arises, as to why Innospec has not raised its prices in order to achieve its intention, stated in the last four years’ annual reports; “to manage the decrease in the sales of TEL for use in automotive gasoline to maximize the cash flow through the decline.” If it has raised its prices in order to achieve its intention then how can the product still be the most cost effective octane enhancer? Ref: Innospec’s last four years Annual Reports:

2008-

http://www.innospecinc.com/assets/_files/documents/mar_09/cm_1238500858_2009-03-31_Form_10-K.pdf

2009- [http://innospec.ir.edgar-](http://innospec.ir.edgar-online.com/fetchFilingFrameset.aspx?FilingID=7066578&Type=HTML)

[online.com/fetchFilingFrameset.aspx?FilingID=7066578&Type=HTML](http://innospec.ir.edgar-online.com/fetchFilingFrameset.aspx?FilingID=7066578&Type=HTML)

2010-

http://www.innospecinc.com/assets/_files/documents/apr_11/cm_1301911642_Form_10-K_2011.pdf

2011-

http://www.innospecinc.com/assets/_files/documents/apr_11/cm_1301911642_Form_10-K_2011.pdf

Relief Requested

Innospec should be asked whether they tell their customers the full costs of the use of leaded petrol or do they just ply these lies from their website.

Innospec should be required to reveal how much it charges for TEL, so that it can be compared to the cost of other non-lead octane enhancers to determine who is correct, the PCFV or Innospec, about the price of adding lead to petrol.

Since Innospec has seen fit to web-publish such deceptive statements, we ask that the OECD request to see copies of the training materials for training for “*refiners and blenders involved in the manufacture of leaded gasolines*”. (REF: <http://www.innospecinc.com/octane-additives.html>)’ – see below on section 7.

Count VII.

Statement of Facts and Applicable Policy

6. Continually seek to improve corporate environmental performance, at the level of the enterprise and, where appropriate, of its supply chain, by encouraging such activities as:

a) adoption of technologies and operating procedures in all parts of the enterprise that reflect standards concerning environmental performance in the best performing part of the enterprise;

b) development and provision of products or services that have no undue environmental impacts; are safe in their intended use; reduce greenhouse gas emissions; are efficient in their consumption of energy and natural resources; can be reused, recycled, or disposed of safely;

TEL is not a product with ‘no undue environmental impacts,’ and is demonstrably not safe in its ‘intended use.’ By providing it, Innospec is not abiding by clause 6 b). TEL is unsafe. The use of leaded petrol creates a poisonous legacy. As noted in The LEAD Group’s *LEAD Action News*, vol 11 no 4, in an article on the six countries where leaded petrol is still sold: “Afghanistan, Algeria, Burma (Myanmar), Iraq, North Korea and Yemen, it seems fair to say, have more on their minds than a switch to unleaded petrol. *Therefore the only way seems to be to cut off the supply of lead additives.*”
http://www.lead.org.au/lanv11n4/LEAD_Action_News_Vol_11_No_4.pdf

The incompatibility of TEL with a safe environment is acknowledged by countries which have phased out leaded petrol, and demonstrated by the importance given to its phase-out by various international environmental organisations, notably the World Bank, the OECD and the PCFV of UNEP.

Relief Requested

That the OECD act urgently to mediate the cessation of supply of TEL for leaded petrol, and failing immediate success with that, that the OECD act urgently to mediate the cessation of supply of lead by Xstrata / BRM to Innospec, as for all the reasons stated in this Supplemental Submission, since Innospec is not abiding by the MNE Environmental Guidelines, then Xstrata / BRM is also not abiding by the Guidelines.

Count VIII.

Statement of Facts and Applicable Policy

6c) promoting higher levels of awareness among customers of the environmental implications of using the products and services of the enterprise, including, by providing accurate information on their products (for example, on greenhouse gas emissions, biodiversity, resource efficiency, or other environmental issues):

As noted above, we have only found evidence on Innospec's website that they have provided false or misleading information about the environmental issues caused by the use of TEL in leaded petrol.

Relief Requested

The LEAD Group Inc. request documentary evidence (verifiably translated into English) from Innospec to demonstrate that they have promoted awareness among their customers of the environmental implications of the storage and transport of TEL and the use of leaded petrol in automotive vehicles.

Count IX.

Statement of Facts and Applicable Policy

6d) exploring and assessing ways of improving the environmental performance of the enterprise over the longer term, for instance by developing strategies for emission reduction, efficient resource utilisation and recycling, substitution or reduction of use of toxic substances, or strategies on biodiversity.

In continuing the sale of the octane additive TEL - a 'toxic substance' - Innospec have failed to recognise that substitution of TEL with non-lead additives is a priority of every country and every organisation which is concerned to protect people and the environment from hazardous emissions of motor vehicles. Good management of Innospec from the day the company changed its name, January 30th 2006, from Octel, which is clearly associated with TEL, to Innospec; which is derived from the combination of the words 'Innovation' and 'Specialty Chemicals' would have made the decision to stop making TEL additive or at least concentrate on the non-octane additives side of the business. While the CEO of Innospec at the time, Paul Jennings, was being quoted in the online news media, probably in an effort to increase share sales, as saying:

The name change was meant to emphasize that the firm, which had sales of \$528 million last year, now gets two-thirds of its sales from non-lead fuel additives and other specialty chemical businesses it has built over the years. "Lead is a declining product" that was associated with the Octel name,

Jennings says. The bulk of sales for the firm are now in innovative specialties, he adds. "We have a future now."

[Ref: Business, Chemical and Engineering News published by the American Chemical Society, April 24, 2006, Volume 84, Number 17, p. 26

<http://pubs.acs.org/cen/business/84/8417bus2.html>]

So although the above reference demonstrates that Innospec was, in 2006, giving the impression to potential shareholders that they were ‘*exploring and assessing ways of improving the environmental performance of the enterprise over the longer term*’, through their lack of action (to either cease making TEL and/or start making a non-lead octane additive) they demonstrated only the ability to plan for the slowest possible improvement to the environment (and to maximize cash flows to the company).

Relief Requested

That the OECD mediate to ensure Innospec walks the walk, instead of just talks the talk.

Count X.

Statement of Facts and Applicable Policy

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7. Provide adequate education and training to workers in environmental health and safety matters, including the handling of hazardous materials and the prevention of environmental accidents, as well as more general environmental management areas, such as environmental impact assessment procedures, public relations, and environmental technologies.

Although Innospec declares that “*Appropriate training is provided to our customers before we supply our product*” ‘customers’ apparently refers only to “*refiners and blenders involved in the manufacture of leaded gasolines*” (REF: <http://www.innospecinc.com/octane-additives.html>). Innospec does not claim to educate or train distributors and sellers, that is, the workers who potentially have the greatest exposure to TEL, albeit blended in the leaded petrol. We can only assume looking at the example of Burma, that in the six countries which continue to allow the sale of leaded petrol (a ‘*hazardous material*’), that distributors and sellers are not properly educated in the handling of the hazardous material leaded petrol. In Burma for instance, many individuals with motorbikes or cars fill up their tank then siphon out the fuel (potentially involving breathing the fumes or even swallowing some of the fuel), selling it on in small quantities to small unregulated roadside outlets whose ‘*bowser*’ consists of plastic bottles (see photos below).

Some examples of Burmese 'Bowsers'



http://1.bp.blogspot.com/_FwVuPdMPByI/TFvpqyjck8I/AAAAAAAAAM3Y/7O-ba5AbMkA/s1600/Hpa-An+petrol+station.JPG



http://2.bp.blogspot.com/_FwVuPdMPByI/TFvpSRNrJTI/AAAAAAAAAM3Q/rFpziDfpRvE/s1600/Myitkyina+petrol+station.JPG

Relief Requested

That the OECD request to see copies of educational or training materials Innospec uses with workers who handle leaded gasoline in the six countries. The LEAD Group would very much like to review the accuracy / usefulness of any verifiable English translations of such materials. Better still, just request that the contractors who will be required to abate the storage facilities for TEL in these countries, once TEL supplies are all shipped back to the Innospec in the United Kingdom, be adequately trained in handling TEL residues and dealing with TEL-contaminated tanks and other infrastructure.

Count XI.

Statement of Facts and Applicable Policy

8. Contribute to the development of environmentally meaningful and economically efficient public policy, for example, by means of partnerships or initiatives that will enhance environmental awareness and protection.

The LEAD Group, as a Partner of the UN Partnership for Cleaner Fuels and Vehicles, has ensured that Innospec has been invited to Partnership meetings but they have never deigned to send a representative, although it's not too late to send a representative to the very last Partnership meeting that should ever need to have the end of leaded petrol on the agenda – the meeting set down for 26th and 27th October 2011 in Nairobi.

Relief Requested

The LEAD Group requests to know if Innospec has contributed to the development of environmentally meaningful and economically efficient public policy in any forum.

Signed:



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