



## **International POPs Elimination Project**

*Fostering Active and Efficient Civil Society Participation in  
Preparation for Implementation of the Stockholm Convention*

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# **Inter-Agency and Inter-Sectoral Cooperation at National and Local Levels to Address POPs-Associated Problems English Summary**

**Independent Ecological Expertise" NGO  
("Partner Initiative" Coalition)**

720028 Kyrgyz Republic, Bishkek, 7th district, build. 30, ap.1  
phone/fax: 996-312- 47-83-72 E-mail. : [expertise@infotel.kg](mailto:expertise@infotel.kg)

**The project working group:**

**Oleg Pecheniuk, the project manager, expert "Independent Ecological  
Expertise" NGO ("Partner Initiative" Coalition)**

**Ludmila Sapozhnikova, expert  
"Partner Initiative" Coalition**

**Tatiana Filkova, expert  
Ministry of Ecology and Emergency Response of the Kyrgyz Republic**

**Natalia Vashneva, expert  
Public Health Ministry of the Kyrgyz Republic**

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### **About the International POPs Elimination Project**

On May 1, 2004, the International POPs Elimination Network (IPEN <http://www.ipen.org>) began a global NGO project called the International POPs Elimination Project (IPEP) in partnership with the United Nations Industrial Development Organization (UNIDO) and the United Nations Environment Program (UNEP). The Global Environment Facility (GEF) provided core funding for the project.

IPEP has three principal objectives:

- Encourage and enable NGOs in 40 developing and transitional countries to engage in activities that provide concrete and immediate contributions to country efforts in preparing for the implementation of the Stockholm Convention;
- Enhance the skills and knowledge of NGOs to help build their capacity as effective stakeholders in the Convention implementation process;
- Help establish regional and national NGO coordination and capacity in all regions of the world in support of longer term efforts to achieve chemical safety.

IPEP will support preparation of reports on country situation, hotspots, policy briefs, and regional activities. Three principal types of activities will be supported by IPEP: participation in the National Implementation Plan, training and awareness workshops, and public information and awareness campaigns.

For more information, please see <http://www.ipen.org>

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The views expressed in this report are those of the authors and not necessarily the views of the institutions providing management and/or financial support.

This report is available in the following languages: English Summary and Full report in Russian

# Inter-Agency and Inter-Sectoral Cooperation at National and Local Levels to Address POPs-Associated Problems

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## **Introduction**

After the declaration of independence, the Kyrgyz Republic altered its international status and became an independent nation-state. As a result, the country became involved in international processes, including *inter alia* the process of ratification of international treaties and conventions. As a party of many environmental conventions, the country had serious commitments to implement them. The Stockholm Convention on POPs is one of the most important ones (our country signed the convention on May 28, 2002)

However, due to lack of sufficient experience of participation in international processes, serious internal problems, lack of skilled and trained personnel, weak interagency and intersectoral co-operation, the country's participation is inefficient and does not allow using potential opportunities that international processes could provide for the country's development and full-scale international cooperation.

Until recently, persistent organic pollutants (POPs) were not paid due attention as priority pollutants in the course of development and implementation of national environmental policy. POPs pollution problems in the republic are further aggravated by 2 additional factors: specific geographic conditions and POPs' capacity to migrate and precipitate. Glaciers represent a potential zone of accumulation of persistent organic pollutants that migrate with air flows from other territories.

## **Assessment of POPs management capacity of the country**

Establishment of a democratic state in Kyrgyzstan generated political and financial support from international organisations. Now, the Kyrgyz Republic is a Party to 13 environmental conventions and protocols including the Basel Convention and the Rotterdam Convention. The decision concerning the Stockholm Convention has not yet been made.

In line with the Stockholm Convention, the Kyrgyz Republic set the following priorities in the sphere of POPs management:

- Strengthening and development of institutional mechanisms for chemical management, particularly management of POPs;

- Development and implementation of mechanisms for prevention of POPs import into the territory of the Kyrgyz Republic;
- Conducting a comprehensive inventory and ensuring safe elimination of obsolete pesticides, including conducting an inventory of POPs in food products;
- Technical capacity building for POPs management;
- Efficient public governance, sustainable economic growth and development.

### **Assessment of existing institutional frameworks for POPs management in Kyrgyzstan**

The range of key executive agencies of relevance to POPs management incorporates: the Ministry of Ecology and Emergency Response, the State Forestry Service, the Ministry of Agriculture, Water Management and Processing Industry, the State Register, the State Agency for Geology and Mineral Resources, the Ministry of Foreign Affairs, the Public Health Ministry, the Ministry of Finance, the State Agency for Power Industry under the Government of the Kyrgyz Republic, the Ministry of Justice, the Ministry of Interior, the Ministry of Economic Development, Industry and Trade, the State Agency for Geology and Mineral Resources, the National Committee for Statistics, the State Commission for Drugs Control, the Ministry of Labour and Social Protection, the Ministry of Defence, the Ministry of Transport and Communications.

In the framework of capacity assessment, the above ministries and agencies were considered as policy-making bodies in the sphere of POPs management. Besides that, they fulfil co-ordinating, regulating and supervisory functions in the sphere.

The system of public governance in the country underwent frequent reorganisation, now, the Ministry of Ecology and Emergency Response of the Kyrgyz Republic is the key actor, responsible for all aspects of chemical management.

#### **The Ministry of Ecology and Emergency Response of the Kyrgyz Republic.**

The key objectives of the Ministry incorporate implementation of the state environmental management, development and implementation of coherent policies in the sphere of hydrometeorological support, environmental quality control and rational use of natural resources at the territory of the Kyrgyz Republic.

By Governmental Decree No. 688-R of November 14, 2003, the Ministry of Ecology and Emergency Response of the Kyrgyz Republic was authorised to serve as the co-ordination and executive body to facilitate implementation the Stockholm Convention on POPs. The Ministry incorporates departments for ecology and natural resource use; monitoring, forecasting and managements of tailings; prevention and mitigation of emergencies; the State Inspectorate for Supervision of Industrial Safety and Mining Control; the Directorate-General for Hydrometeorology.

In particular, their functions incorporate:

- setting resource use limits (emission/discharge limits, waste disposal limits), issuance and withdrawal of licences for recycle, disposal, elimination and burial of toxic substances and waste (including radioactive ones);

- transportation (including transboundary transportation) of toxic production waste;
- state registration (jointly with other ministries, state committees, agencies, economic actors) of use of natural resources, pollution releases, other adverse environmental impacts and their sources;
- analysis of environmental quality and trends to forecast extremely high environmental pollution levels and to notify governmental bodies and economic actors on these matters.
- state on-site environmental control over storage, registration and use of highly toxic substances in production processes;
- systemic monitoring of meteorological, hydrological, agrometeorological parameters; monitoring of pollution levels of surface water bodies, ambient air (including radiation levels);
- production of weather forecasts, river flow and crops yield forecasts,
- warning on natural and extremely high pollution levels;
- ensuring collection, analysis and processing of information for purposes of sustainable development of the Kyrgyz Republic.

### **The Directorate-General for Hydrometeorology of the Ministry of Ecology and Emergency Response of the Kyrgyz Republic (Kyrgyzhydromet)**

The Directorate-General has necessary capacity to monitor levels of some persistent organic pollutants in the ambient air and surface water bodies (DDT, HCCH). Analytical laboratories of the Directorate are not certified by the state and do not have necessary equipment, but their personnel members are highly skilled and experienced.

The Directorate maintains the database of benz(a)pyrene air contamination in Bishkek (1986 - 1999), residual pesticide levels (DDT, HCCH) in surface water bodies and soil (1979 - 1992). However, the bulk of the above information is maintained as paper documents. Analytical laboratories have necessary methodological documents and regulations.

The Directorate maintains a network of fixed air monitoring posts in Bishkek, Kara-Balta, Tokmok, Cholpon-Ata - these monitoring posts are equipped with necessary instruments to take samples for determination of benz(a)pyrene.

Besides that, the Directorate-General for Hydrometeorology of the Ministry of Ecology and Emergency Response of the Kyrgyz Republic submits monthly analytical reports on environmental quality.

Capacity assessments of the Directorate-General suggest that, due to lack of funds, the system of environmental monitoring of polycyclic aromatic hydrocarbons and POPs pesticides does not operate at a sufficient level.

### **The Public Health Ministry of the Kyrgyz Republic**

The Ministry incorporates the Directorate for State Sanitary and Epidemiological Control, research and medical treatment facilities. The Directorate monitors sanitary and epidemiological situation in the republic. The Ministry has relevant subordinate units at the oblast and district levels.

The research and production association "Prevention Medicine" has necessary research capacity to study impacts of POPs on human health in the country.

In order to study POPs' impacts on human health in the country, the Public Health Ministry has necessary skilled personnel, certified laboratories, equipped with modern instruments, regulations (harmonised with international requirements), results of long-term socio-sanitary monitoring and results of scientific research on these matters.

The underlying laws and regulation of the Public Health Ministry incorporate:

- Law on Public Health in the Kyrgyz Republic;
- Law on Sanitary and Epidemiological Wellbeing of the Population;
- Regulations of the State Sanitary and Epidemiological Service of the Kyrgyz Republic, approved by Governmental Decree No. 778 of December 10, 2001;
- The National Environment and Health Action Plan (NEHAP);
- The Code of Administrative Offences of the Kyrgyz Republic;
- Law on Licensing;
- Lists of maximal permitted concentrations and maximal permitted levels of pollutants and hazardous substances;
- Sanitary standards and rules, methodological recommendations and occupational safety, hygiene and sanitary manuals for hazardous facilities;
- Approved laboratory testing techniques.

The database contains:

- Statistical reporting forms F18;
- Sanitary and epidemiological certificates of compliance with applicable sanitary standards and rules;
- Laboratory testing records;
- Sanitary certificates of sites under current sanitary and epidemiological supervision, including pesticide storage facilities;
- The national register of potentially toxic chemicals;
- Sanitary examination records of territorial sanitary and epidemiological facilities;
- Forms of preliminary and periodical medical examinations of categorised patients;
- Results of in-dept medical examination of children and adolescents;
- Registration cards of occupational disorders;
- Population morbidity data of the Republican Medical Information Centre;
- Results of laboratory testing of territorial sanitary and epidemiological facilities;
- Data of the Republican Information and Statistics Committee;
- Scientific research results of research and production association "Prevention Medicine" of the Public Health Ministry;
- "Health and Environment" yearbooks.

Notwithstanding existing capacity of the Public Health Ministry of the Kyrgyz Republic, due to lack of funds, specific research works to study POPs impacts on public health in the country are

not implemented. The underlying laws and regulations need some adjustments to incorporate separate provisions on POPs-containing substances.

### **The Ministry of Economic Development, Industry and Trade of the Kyrgyz Republic**

The Ministry of Economic Development, Industry and Trade of the Kyrgyz Republic:

- incorporates Industrial Department, that includes:
  - Metallurgy and Engineering Section;
  - Fuel and Energy Complex Section;
  - Light and Local Industry Section.
- regulates all industries (engineering, mining, metallurgy, construction materials, fuel and energy),
- oblast/district level State Administrations incorporate relevant industrial units;
- maintains information on PCBs sources in the country;
- maintains information on export/import of products.

The list of potential PCBs-containing items in the Kyrgyz Republic incorporates:

- electric equipment items (capacitors, transformers) at sites of fuel and energy complex facilities, ferrous and non-ferrous metallurgy plants, chemical, petrochemical facilities, engineering and other facilities, including decommissioned ones;
- industrial waste disposal sites;
- municipal landfills;
- illegal waste dumps;
- paint-production facilities;
- transport facilities.

Due to organisational restructuring, units of the Ministry did not have powers to assess quality of PCBs-containing items and did not provide for compliance with occupational safety rules in the course of operating these equipment items.

Notwithstanding the existing capacity of the Ministry of Economic Development, Industry and Trade of the Kyrgyz Republic, due to lack of funds, specific research works to study impacts of PCBs on human health (occupational exposure) and environment in the country are not implemented. The underlying laws and regulations need adjustment to incorporate separate provisions on PCBs-containing equipment items.

### **The Ministry of Finance of the Kyrgyz Republic**

The Ministry of Finance of the Kyrgyz Republic is a state body of relevance to control of POPs-containing chemicals. The Ministry incorporates:

- the Customs Service Department that monitors import/export flows of goods via the border of the Kyrgyz Republic.
- the Department of Economy and Structural Policy that deals with social and economic development of the country and fulfils co-ordination functions.

The above departments may facilitate study of the following issues:

- import/export of PCBs, pesticides and other POPs-containing chemicals,

- socio-economic conditions for reduction (elimination) of PCBs, pesticides and other POPs-containing chemicals;
- identification of sources of funds for implementation of the National Action Plan for eventual implementation of the Stockholm Convention on POPs.

### **The Ministry of Agriculture, Water Management and Processing Industry of the Kyrgyz Republic**

The Ministry of Agriculture, Water Management and Processing Industry of the Kyrgyz Republic incorporates the Ministry of Agriculture, Water Management and Processing Industry, that, in its turn, incorporates 7 oblast-level and 43 district-level centres staffed by skilled personnel.

The range of key functions of the above centres includes:

- state governance in the sphere of safe management of pesticides and agricultural chemicals, control of plant sanitary and agrochemical developments in the course of their production, sale, transportation, storage, use, neutralisation, recycle, elimination, burial and import/export to/from the Kyrgyz Republic;
- maintenance of state control of compliance with laws and regulations of the Kyrgyz Republic in the sphere of safe management of pesticides and agricultural chemicals by all governmental, public organisations, bodies and facilities, agricultural co-operatives, farmers and other economic actors, regardless their subordination and ownership forms, as well as by all officials.

Laboratory equipment was purchased to equip 2 toxicological control laboratories - the equipment allows measurement of all pesticides and their residual amounts in food products of plant origin, soil and water samples. These toxicological control laboratories have been certified and have necessary specialists, however, the department does not control pesticide burial sites that are not protected and are easily accessible for local residents.

### **The National Committee for Statistics of the Kyrgyz Republic**

The National Committee for Statistics of the Kyrgyz Republic maintains institutional linkages with ministries and agencies according to Law on Statistics and mutual co-operation agreements for mutually beneficial exchange of economical and statistical information.

The National Committee for Statistics incorporates oblast/district committees and data processing centres. Statistical data are collected and processed annually along territorial lines. Notwithstanding a broad range of statistical information processed, the National Committee for Statistics does not collect/process information on POPs. Due to the fact, that persistent organic pollutants are not produced in the country (all POPs are imported), their inflow may be traced by statistical information of the Customs (using specific foreign trade product codes).



Main ministries and agencies of relevance to implementation of the Stockholm Convention		
No.	Ministries and agencies	Functions
1	The Ministry of Ecology and Emergency Response of the Kyrgyz Republic	State environmental governance, development and implementation of coherent policies in the sphere of hydrometeorological support, environmental quality control and rational use of natural resources.
1.1	The Department for Ecology and Natural Resource Use of the Ministry of Ecology and Emergency Response of the Kyrgyz Republic	Implementation of coherent scientific and technical policies on environmental protection matters, co-ordination of activities of ministries, agencies, facilities, bodies and organisations in the sphere; monitoring of environmental pollution sources. Maintenance of state control of compliance with the due environmental legislation.
1.2	The Directorate-General for Hydrometeorology	Environmental monitoring. Development of weather, hydrological and agricultural forecasts.
1.3	The State Inspectorate for Supervision of Industrial Safety and Mining Control	Implementation of coherent state policies to protect ambient air from chemical impacts. Ensuring safety in the course of production and use of chemical products. Ensuring safety in the course of application of chemical substances. Organisation and implementation of state regulation of industrial safety and state control of compliance with occupational safety rules and requirements to safety of equipment and production processes of hazardous chemical production facilities.

1.4	The Department for Prevention and Mitigation of Emergencies	Implementation of necessary actions to prevent and mitigate emergencies and disasters associated with use of chemicals.
1.5	The Department for Monitoring, Forecasting and Managements of Tailings	Implementation of necessary actions to prevent and eliminate emergencies and disasters associated with tailing dumps.
2.	The State Forestry Service of the Kyrgyz Republic	Implementation of coherent state policies for forest protection (including protection from impacts of chemical industry, application of pesticides and other chemicals).
3.	The State Agency for Registration of Real Estate Rights	State control of use and protection of land, control of compliance with the due land legislation, including in the course of use of chemicals.
4.	The State Agency for Geology and Mineral Resource	State control of rational use and protection of mineral resources, including in the course of use of chemicals.
5.	The Public Health Ministry of the Kyrgyz Republic	Development and implementation of coherent state policies for prevention of adverse health and environmental impacts of chemicals; registration of toxic chemicals, general co-ordination of policies for safe use of chemicals.
6.	The State Committee for Drugs Control	Prevention of adverse health and environmental impacts of drugs, psychotropic substances and precursors, general co-ordination of policies for safe use of these substances.

7.	The Ministry of Agriculture, Water Management and Processing Industry of the Kyrgyz Republic, the Department for Chemicals Application and Plant Protection	Implementation of coherent policies and necessary actions for application of fertilisers and pesticides in agriculture, control of chemical substances in food products, protection of water bodies from chemical contamination.
8.	The Ministry of Labour and Social Protection of the Kyrgyz Republic	Implementation of coherent state occupational safety policies in the course of production and use of chemicals.
9	The Ministry of Economic Development, Industry and Trade of the Kyrgyz Republic	State regulation of export and import of chemicals, including procedures of import/export and use of hazardous waste. Issuance of export and import licenses.
10	The Ministry of Transport and Communications of the Kyrgyz Republic	Implementation of necessary actions and development of rules for transportation of chemicals by different means of transport.
11	The State Agency for Power Industry	Development and implementation of necessary activities for production and use of chemicals in the fuel and energy complex (including waste processing).
12	The State Agency for Science and Intellectual Property under the Government of the Kyrgyz Republic (KyrgyzPatent)	Implementation of coherent scientific and technical policies in the sphere of production and use of chemicals (including waste treatment).
13	The Ministry of Finance of the Kyrgyz Republic	Financing of all activities of national significance in the sphere of chemical management.

13.1	The Customs Inspectorate	Control of POPs import.
14	The Ministry of Foreign Affairs	Co-ordination and control of implementation of international commitments.
15	The Ministry of Interior of the Kyrgyz Republic	Organisational arrangements and implementation of state control over illegal use of chemicals.
16	The Ministry of Defence of the Kyrgyz Republic	Development and implementation of necessary activities to control production and use of chemicals in defence industries (including control of waste treatment).
17	The Ministry of Justice of the Kyrgyz Republic	Approval and registration of all regulations in the sphere of chemical management.
18	The National Committee for Standards and Metrology	Development and implementation of coherent state policies for development of standards and requirements to chemicals and their use, as well as control of compliance with these standards and requirements.

### **Intersectoral co-operation**

The country has already accumulated some experience of intersectoral co-operation in the sphere of addressing environmental problems (both positive and negative).

In this particular context, the intersectoral co-operation is understood to cover co-operation between three social sectors: public authorities, businesses and civil society institutions. Local self-government bodies serve as an intermediate level between civil society institutions and public authorities. They are closer to civil society as their functions incorporate addressing local problems under their jurisdiction; however, actually they represent a local level of public authorities and depend on "upper-level" decision-making.

Now, local self-government bodies in the country are at the stage of development. Their underlying laws and regulations are being developed, their structures, functions and powers are under discussion, as well as issues of delineation of functions and powers between governmental and local self-government bodies.

Important objectives of local self-government bodies may incorporate:

- public participation in decision-making;
- development of real mechanisms of public control over activities of local self-government bodies;

- promotion of grass-roots initiatives to address issues of local significance.

In practical terms, these objectives are often pursued by NGOs and international organisations. Such a scheme allows local self-government bodies to ascertain positive aspects of social partnerships and engage NGOs and community-level organisations into planning of territorial development and implementation of local projects.

Examples of co-operation are more often seen in relations between the governmental sector and the general public, between the general public and local self-government bodies. Examples of co-operation with involvement of businesses are rarer. However, in recent time, there was some growth of non-profit organisations of business representatives, e.g. the Association of Forestry Product Processing Businesses, unions of entrepreneurs, the Association of Taxpayers, etc. Generally, these organisations are established to protect and promote interest of their members.

Governmental bodies started to realise that public participation in decision-making and development of programs and strategies could substantially facilitate ongoing reforms.

Non-governmental organisations participated as experts in development of national state programs, including the project "Support for the Kyrgyz Republic in Implementation of the Stockholm Convention".

NGOs independently initiate and implement such projects as implementation of the Aarhus Convention into the national legislation; public environmental expert assessments of projects and economic activities, appeals against some governmental decrees, development of draft regulations, etc.

In terms of impact on governmental bodies, the most efficient NGOs usually either have former officials as their members, or maintain personal contacts with acting governmental officials. A relatively small part of the third sector organisations actively participate in national and international processes - they are predominantly concentrated in the capital city, oblast centres and industrial centres of the country.

It is worth to note the positive experience of intersectoral co-operation of coalitions and information/specialised networks of NGOs at the national and international levels. It is necessary to use the already existing capacity of NGOs in the course of fulfilment of international commitments under the Stockholm Convention and in POPs management at the territory of the Kyrgyz Republic.

POPs management processes in the Kyrgyz Republic substantially depend on participation of NGOs, local communities (e.g. farmers and their associations, such as associations of water users) in decision-making and development of strategies and programs. The already existing laws and regulations provide beneficial preconditions for such participation.

Now, there are certain beneficial preconditions for development of intersectoral co-operation in the country, including:

1) At the system level - political will of higher governmental authorities, provisions of national program and strategies, international programs and documents; the legislation of the Kyrgyz Republic.

2) At the institutional levels – provisions of action plans for implementation of programs and strategies (public participation in decision-making, support of NGOs, establishment of public information centres) and internal programs of ministries and agencies on development of social partnerships for implementation of national programs and strategies.

3) At the individual level - actual implementation of the country's commitments on strengthening intersectoral co-operation in the course of addressing different problems.

Intersectoral co-operation is easily achievable in the following spheres:

- Development of programs and strategies
- Development and implementation of local projects
- Joint participation in international projects
- Joint drafting and lobbying for regulations
- Analytical groups
- Information exchange.

It is worth to note that now NGO members are generally involved in projects as individual experts. However, in their reports, project managers and donors generally refer to NGOs these experts represent. Alternatively, notification on a project may be reported as participation in decision-making. As a result, donors' requirements are met formally, while actually these requirements are not met.

### **Problems of interagency and intersectoral co-operation in the sphere of environmental protection**

The following problems may prevent efficient intersectoral co-operation in the sphere of POPs management:

At the system level:

- Lack of a coherent policy in the sphere of environmental protection, rational resource use and sustainable development.
- Low priority of environmental issues at the governmental level.
- Lack of interagency co-ordination of governmental bodies.

At the institutional level:

- Lack of regulations on matters of social partnerships and social contract opportunities;
- Scattered monitoring of POPs by different ministries and agencies;
- Environmental statistics is not dealt with as a separate statistical data block by state statistics bodies and relevant ministries/agencies. Generally, these activities are made in parallel with other activities;
- Separate monitoring results are inadequate due to application of different methodologies;
- Low use of information technologies: the majority of information is kept in paper documents (processing of paper documents is time intensive);

- Ministries and agencies report information-gathering difficulties in connection with fragmentation of large facilities, their reorganisation, changes in ownership, etc.

At the individual level:

- Lack of common objectives in the sphere of environment and sustainable development;
- Lack of procedures for intersectoral co-operation;
- Weak information exchange;
- Low level of environmental awareness at all levels, including the level of decision-makers;
- Low awareness of capacity of other sectors,
- Social stereotypes;
- Intersectoral mistrust - as a result, opportunities for association and resource sharing (intellectual, finance, institutional, etc.) are not used.

### **Involvement of civil society and a strategy to raise public awareness of POPs**

Analysis of existing laws and regulations on public participation processes suggests that the legislation of the Kyrgyz Republic in the sphere is sometimes of a declarative nature. If a legislative provision is duly incorporated into the legislation, its efficiency should be primarily assessed by its practical applications.

However, the problem of public participation is associated with lack of opportunities to materialise the right to participate - as there are no mechanisms of participation. This means that the right exists as a law on paper, but the lack of mechanisms for its materialisation makes it impossible to use the right as a law in practice. Fulfilment of international commitments under the Stockholm Convention requires substantial efforts of ministries, agencies and regional authorities. Moreover, civil society also should make its substantial contribution. In this connection, it is necessary to ensure active involvement of the third sector into POPs management. To this end it will be necessary to raise public awareness of adverse health and environmental impacts of POPs, to ensure active public participation in decision-making on POPs-related matters, in POPs elimination and neutralisation works. It is necessary to launch a broad public information campaign on hazards of POPs generation and migration.

In this connection, it is necessary to develop a clear strategy in order to raise public awareness of POPs. The strategy should be accompanied by a program of specific actions for its implementation.

Besides that, it is necessary to develop economic mechanisms to facilitate public participation in POPs management.

### **Conclusions:**

- The country lacks a coherent system of POPs management - relevant functions are scattered between different ministries and agencies, while the Government of the Kyrgyz Republic does not fulfil its co-ordinating role (as stipulated by Law on the Government of the Kyrgyz Republic). The lack of interagency co-ordination hinders fulfilment of international commitments.

- Now, the country lacks a framework law on chemicals, while numerous national laws and regulations on POPs-related matters are inadequate.
- Fulfilment of specific functions in the sphere of POPs management by relevant ministries and agencies is regulated by narrow regulations (e.g. instructions on handling of separate chemicals - pesticides, hazardous cargo items, drugs, medical preparations, etc.). As a result, application of a comprehensive approach to monitoring and decision-making is impossible.
- POPs management matters are dealt with by numerous agencies, but they lack mechanisms of co-operation.
- Control powers are delegated to several ministries and agencies - such a scheme results in duplication and inconsistency of efforts.
- The country lacks a system of state reporting on POPs.
- No inventory works are made to control POPs in use.
- Environmental monitoring is financed inadequately, monitoring facilities are scattered and the majority of monitoring laboratories are not certified. All these factors prevent efficient decision-making on monitoring management matters.
- The country lacks a coherent information system in the sphere of POPs management.
- Low public awareness of POPs and low level of public participation in POPs management.
- POPs-related risks may be reduced by improvement of intersectoral and interagency co-operation in the sphere of POPs management.

#### Recommendations

- In order to improve the system of environmental management in the Kyrgyz Republic, to enhance intersectoral and interagency co-operation for implementation of the Stockholm Convention;
- In the framework of development of environmental policies, improvement of the legislation in the sphere of environmental protection and rational use of natural resources;
- In order to strengthen institutional capacity and opportunities for all groups of interests for implementation of international commitments of the Kyrgyz Republic, the Project Working Group proposes the following recommendations:

#### The system level:

- To establish a co-ordination body under the Government of the Kyrgyz Republic to prevent duplication and to join efforts for fulfilment of commitments under the Stockholm Convention.
- To co-ordinate activities for fulfilment of commitments under three key conventions (Stockholm, Basel and Rotterdam conventions) in order to reduce adverse health and environmental impacts on hazardous chemicals and waste.
- To integrate actions for implementation of the Stockholm Convention into short-term, medium-term and long-term national, sectoral and territorial plans and programs;
- To co-ordinate use of budgetary and extrabudgetary resources for implementation of the Convention;
- To develop the system of pollutant release and transfer registers at the national and regional levels;



- To organise exchange of information on findings of inventories of banned and obsolete pesticides, pesticide treatment and elimination plans, monitoring results between relevant governmental bodies and members of the general public, who participate in identification of unauthorised storage and use of banned and obsolete pesticides, focusing on agricultural districts and private gardens;

The institutional level:

- To incorporate mechanisms of participation of all stakeholders in implementation of the Convention into agency-specific regulations.
- The Government of the Kyrgyz Republic should develop and introduce mechanisms of intersectoral social partnerships by initiation and lobbying for laws on social partnership and state contracts.
- The due legislation, pertaining to accession to international treaties, should stipulate (stronger) sanctions against relevant officials for non-compliance with the due procedures of making international commitments.
- To approve a regulation to introduce personal (administrative/criminal) responsibility of senior officials for their individual/corporate decisions, execution and consequences of these decisions;
- To introduce special provisions into statutory laws/regulations of relevant ministries and agencies, stipulating responsibility of officials for quality of objects of regulation they manage (forests, biodiversity, water bodies, land resources, air, etc.), including POPs contamination aspects.
- The specially authorised body for implementation of the Stockholm Convention (the Ministry of Ecology and Emergency Response) should permanently develop contacts with international organisations, dealing with health impacts of pesticides, alternative agriculture, and introduction of environment friendly agricultural technologies.

The individual level

The specially authorised body for implementation of the Stockholm Convention (the Ministry of Ecology and Emergency Response) should:

- Develop programs to enhance practical skills of representatives of all social sectors in the sphere of application of procedures and mechanisms of intersectoral co-operation in processes of making significant decisions and controlling use and movements of POPs.
- Optimise the system of professional training of specialists in different sphere of environmental protection and natural resource use, incorporating specific agencies as subjects of the education process; raise legal awareness of responsibility of resource users and decision-making bodies (including development and making international commitments).
- Facilitate the process of implementation of the Convention by focusing on partnership-based pilot projects for POPs inventories and elimination with participation of local communities.

- Use already existing networks of NGOs, local self-government bodies, the Congress of Local Communities, the Association of Local Self-government Bodies of Villages and Townships of the Kyrgyz Republic, associations of water users, centres for support of associations of water users under the Water Management Department in order to improve access to information on pesticides and safe alternatives for reduction of impact risks and introduction of methods of control over application of highly toxic pesticides.