

# Strategic Approach to International Chemical Management (SAICM) Regional SAICM Implementation Report

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<b>Region</b>	Central and Eastern Europe
<b>Hub</b>	Arnika – Toxics and Waste Programme

## 1. State of SAICM implementation

NGOs are not usually part of a government implementation committee or process and the level of encouragement of their involvement is very limited. Involvement of NGOs in developing strategies and openness of governments to involve NGOs in their SAICM implementation activities are in general low. However, some NGOs have been carrying out activities directly focused on SAICM implementation in their countries and in the region.

According to experiences of NGOs from the CEE region, National SAICM Focal Points seem to be accessible. At the same time the NGOs rarely contact them, as activities focused primarily and explicitly on SAICM implementation are not common in the region. Also, the NGOs are probably not motivated to work with Focal Points or are not aware of possible benefits of communicating with the Focal Points. However, some NGOs do engage with them- for example, the NGOs in Hungary and Albania are in a good contact with their national Focal Points.

IPEN CEE region is divided into two parts: EU member states and non-EU states. While implementation of chemical safety legislation and its enforcement is governed according to EU rules in the northwestern and central part of our region, it is very differentiated in its eastern and southeastern part. EU member states in our region are the following countries: Bulgaria, Czech Republic, Hungary, Estonia, Lithuania, Latvia, Poland, Romania, Slovakia and Slovenia. Following are non-EU countries: Albania, Belarus, Bosnia and Hercegovina, Croatia (EU accession country), Macedonia (EU accession country), Montenegro, Serbia (including Kosovo) and Turkey (EU accession country).

EU-ruled countries have to meet many obligations regarding chemical safety rules. There are specific EU directives (needed to be introduced into the national legislation by national laws) or regulations (directly applied to national legislation). This includes regulation on Registration, Evaluation and Authorization of Chemicals known under its abbreviation as REACH. Unfortunately, it doesn't mean that everything is going well in EU member states. For example, Pollutant Release and Transfer Register (PRTR) in the Czech Republic is under continuous pressure from industry, because it also requires chemically specific reporting on wastes. Waste management regulation is under pressure within the EU in general (e.g. limit values for dioxins).

Chemical safety in the region is improving in general, but it could be faster, according to NGOs.

## **2. What are the major gaps in SAICM implementation in your region?**

The major problems in the CEE region haven't changed much since the last Citizens Report was released.

There are still sites contaminated by industrial activities where there is a need for clean up. Contaminated sites include both working enterprises and obsolete factories and dumpsites. Many landfills in both EU and non-EU countries are in unsatisfactory conditions (for example, missing drainage systems, etc.), which is especially problematic when combined with the low level of hazardous waste separation. Clean-up activities can be considered slow and non-transparent due to insufficient enforcement and insufficient finances available. Also, there's a lack of compulsory action plans.

Inadequate waste management and weaknesses of new waste legislation regarding chemical safety are a significant problem. The waste framework directive and Persistent Organic Pollutants (POPs) regulations allow the release of high volumes of POPs through the waste flow, promotion of technologies producing new POPs (such as incineration of wastes), and more open borders to waste movement. Also, e-waste is for sure an important issue, mainly in non-EU and new EU member countries. Procedures and facilities for adequate treatment for this emerging type of waste are still lacking and their enforcement is weak. Also in the EU the procedures for collection and management of e-waste are sometimes not clear enough. A significant amount of e-waste continues to be mixed with municipal waste in both EU and non-EU countries.

Another example of a gap in handling waste properly is the European Pollutant Release and Transfer Register, where waste is not required under chemically specific reporting, but only in total amounts of hazardous waste generated by facilities reporting to PRTR. European PRTR also does not cover all industries, but by majority only those for which Integrated Pollution Prevention and Control IPPC permits are required.

EU policy on POPs is heavily oriented on air releases mainly and does not pay enough attention to other pathways of pollution by POPs.

Additionally, there are still double standards in chemical policy between EU and non-EU countries. The non-EU countries still have different (usually weaker) legislative and other measures to control chemicals. In these countries the lack of clear communication and information sharing procedures between various state institutions and the absence of an integrated program of chemicals management are problems.

There's also a need for strengthening of the multi-stakeholder approach to development of chemicals management strategies on national level. Although communication among stakeholders might be relatively vital, the tools and formal procedures for involvement of the public and NGOs in development of strategies are weak or lacking. This fact resonates with increasing lack of funding for civil society activities due to the economic situation of European countries. The lack of financial sources results in elimination of civil society services and activities. It is also an obstacle in building capacities of civil society and independent experts. It

needs to be said that in some countries the budgets of state environmental and health institutions have also been cut.

Lack of regular monitoring data and their low accessibility by the public is common in most of the non-EU countries in the region. This is also due to the lower capacity of laboratories available in these countries. However, even the situation in some EU countries is not satisfactory. Usually there's a problem with low emphasis on awareness-raising, ability of public to use the information and also adequacy of monitoring.

In general, there are still many highly hazardous pesticides being used; many hazardous substances (like EDCs) are on the market, in cosmetics, food, and other everyday products (pesticides, phthalates, triclosane, etc.); multiple pesticide residues can still be found in food (especially in food from non-EU countries) and substitution within REACH is not happening.

### 3. Inventory of NGO activities supporting SAICM implementation

In general, actions of NGOs in the CEE region focused on the issues connected to SAICM are rather limited. We assume that this is mainly due to the low availability of funding for such activities and by the high popularity and attractiveness of other environmental issues (energy, global warming etc.) among the public and NGOs in the region. However, there's still a number of NGOs systematically working on the issue of chemicals management. Most of the activities fall under the Knowledge and Information category, but there is also significant amount of activities focused on Capacity Building and Governance.

SAICM Objective	NGO Activity and Results	Names of NGOs	Country
Risk Reduction	Pilot project of e-waste collection in Minsk	CES	Belarus
	Surface and drinking water monitoring (found illegal pesticide pollution in drinking water in Budapest)	CAAG & CEPTA	Hungary & Slovakia
	Soil and water measurements around red mud sites: Kolontar and Almasfuzito (found many polluted sites)	Greenpeace CEE - HU	Hungary
	Fruit and vegetable testing, 4 rounds (found several pesticides above EU MRLs)	CAAG & PAN Europe	Hungary & other EU countries
Knowledge and Information	Research work on vaccines in Macedonia, resulting in preparing an issue paper	Eco-Sense	Macedonia

	Development of 5 fact sheets on mercury	Eco-Sense	Macedonia
	Conducting hair sampling of 33 people for mercury levels	Eco-Sense	Macedonia
	Dissemination of consumer advices on lifestyle changes for natural decrease of mercury contamination	Eco-Sense	Macedonia
	Study of public awareness about lead contamination around an old battery factory in Uznova	EDEN Center	Albania
	Awareness raising campaign for local inhabitants about risks connected to former Used Lead Batteries factory in Berat	EDEN Center	Albania
	Short investigative movie on Vlora PVC plant	EDEN Center	Albania
	Assesment of chemicals in food products and awareness raising campaign	EDEN Center	Albania
	Analyses of PVC wallpapers and floor coverings	Arnika	Czech republic
	Assesment of chemicals (PFC, BFRs) in Czech fish and river sediments	Arnika	Czech republic
	Project focused on chemicals in medical equipment and waste (EMAS for hospitals)	Arnika	Czech republic
	Assessment report of the situation of e-waste	CES	Belarus
	Awareness raising activities on e-waste	Za Zemiata	Bulgaria

	Awareness raising events & translation of WECF chemicals guides into local languages	WECF, Baltic Environmental Forum, Women's Movement for Integral Development (al), Journalists for Women and Children Rights and Environmental Justice (mk), Resource Center Leskovac (srb)	Albania, Macedonia, Serbia
	Establishment for a public centre information centre for chemical safety	CES, Arnika	Belarus
	The Fight to Know? Substances Of Very High Concern & The Citizens' Right To Know Under Reach (analyses for phthalates in consumer products and right to know exercise under REACH)	CAAG (part of larger EU report with BUND, SSNC, WECF and EEB)	Hungary
	Measurements & press action against illegal POP storage in Gdansk next to the Baltic see (we found high pollution)	Greenpeace CEE - Poland	Poland
	Information to the public on pesticides, water & drinking water pollution	CAAG & CEPTA	Hungary & Slovakia
	Awareness raising and a demonstration against the planned giant cyanide gold mine in Rosia Montan	Greenpeace	Romania
Governance	Development of Waste Action Plan for the city of Vrbovec	Zelena Akcija	Croatia
	Assesment of effects of Croatian membership in EU on issues of health and	Zelena Akcija	Croatia
	Campaign against reduction of the Czech Integrated Pollution Register	Arnika	Czech republic
	Meetings with Belarusian authorities regarding public involvement in decision making about planned building of incinerators	CES, Arnika	Belarus

	Waste prevention – necessary step towards sustainable development in Visegrad countries	Friends of the Earth - SPZ	Slovakia
	Information on pesticide residues in food to the public, to supermarkets and to decision makers	Greenpeace CEE - HU	Hungary
	Initiated EU infringement procedure against polluting red mud site at Almasfuzito	Greenpeace CEE – HU	Hungary
	NGO comments on the National Action Plan on Sustainable Pesticide Use	Greenpeace CEE – HU & CAAG	Hungary
Capacity Building	Seminar with 4 lectures on pesticides prevention and integrated pest management followed by a booklet for farmers	IRRE	Croatia
	Development of a 23 page manual on Integrated Pest Management for producers	IRRE	Croatia
	Waste management symposium and Waste action plan workshop	Zelena Akcija	Croatia
	Multi-stakeholders trainings on products and chemical safety in Albania, Serbia and Macedonia	WECF, Baltic Environmental Forum, Women’s Movement for Integral Development, Journalists for Women and Children Rights and Environmental Justice, Resource Center Leskovac	Albania, Serbia, Macedonia
	Training to farmers and to NGOs on pesticide reduction and pesticide alternatives	CAAG & CEPTA	Hungary & Slovakia
Illegal Traffic			

#### **4. NGOs actions on emerging policy issues**

In 2011 the Belarusian NGO CES implemented a project focused on e-waste and batteries in particular. They initiated a pilot battery collection project accompanied with an awareness raising campaign. They were also able to cooperate with the Minsk municipality. In 2010 CES developed an assessment report on the situation of e-waste management in Belarus. Za Zemiata from Bulgaria also run a campaign focused on waste and e-waste in particular. Their activities are mainly on an awareness-raising level (discussions, screenings, subtitles for movies...).

Arnika – Toxics and Waste Programme as IPEN Dioxin and Waste Working Group secretariat, coordinated activities focused on Chemicals in Products. Samples of baking paper and carpet paddings were collected and analyzed for the presence of PFC and PBDE. NGOs from Albania, Belarus, Bulgaria, Czech Republic, Hungary, Macedonia, Romania, Serbia and Slovenia participated in this activity. Also, analyses of PVC wallpapers and floor coverings were done by Arnika in Czech Republic, and 4,85-17 percent of phthalates were found in each product. DEHP was found in 2 products. The results were publicized via media. Arnika also runs a project focused on chemicals in medical equipment and waste. The project includes awareness raising activities, analyses and joint work with hospitals on improving chemicals management.

WECF, in cooperation with Baltic Environmental Forum, Women's Movement for Integral Development, Journalists for Women and Children Rights and Environmental Justice, and Resource Center Leskovac, have been implementing an EuropeAid project focused on products and chemicals safety in the Balkans. The project includes activities such as inventory-comparison of the actual and legal situation in the partner countries, development of an internet tool and training kit, capacity building multi-stakeholder trainings in 3 partner countries, and awareness raising activities or organization of a corporate social responsibility conference.

#### **5. Interesting case-study examples of SAICM implementation**

Zelena Akcija from Croatia implemented a project on waste management in Vrbovec city. They initiated a waste separation pilot project, organized a conference and prepared a scientific paper. Based on these activities they prepared a Waste Action Plan for Vrbovec city. During the implementation phase, different stakeholders (municipality representatives, NGOs, scientists) were approached. The project significantly contributed to improvement of waste management in the city of Vrbovec; some practices were adopted by the municipality and the project can be used as a replicable pilot example.

Center for Environmental Solutions (Belarus), in partnership with Arnika (Czech Republic), have been implementing a project focused on strengthening public participation on environmental decision-making and SAICM implementation in Belarus. A consultation centre for chemical safety serving to concerned citizens was opened in Minsk. CES are also working on establishment of a network of environmental NGOs. One of the activities of the network focused on incinerators. A meeting with officers of relevant ministries was held, a media event was organized, a press release was released, etc. These activities helped to postpone building of a planned incinerator and supported aims of deeper environmental assessment.

In 2012 Greenpeace CEE worked in Poland to uncover the pollution of a hazardous waste incinerator and storage site. The company stored HCB, HCH and DDT wastes in an absolutely improper way 60 meters from the Baltic Sea. Greenpeace took samples around the area of Port

Service. Despite the Basel Convention, hazardous waste, including POP wastes, was stored in loose, leaking plastic bags, so the POP wastes are polluting the environment. Different types were stored together. In all samples, even 20-50 meters from the fence of Port Service, HCB was measured. The most dangerous substances were alpha-HCH, HCB and DDT. The Polish HCB limit is very high for industrial areas. In many countries the maximum limit value is 1 mg/kg, but the Polish law allows 15 mg/kg. For atrazine, which also a hazardous substance, but does not accumulate in human tissues, the limit value is just 0,05 mg/kg. For that reason HCB levels did not breach the limit value for industrial areas, but atrazine exceeded the Polish maximum limits almost 20 times outside the plant and 50 times inside the plant. Stricter alpha-HCH and DDT industrial limits were exceeding the limits in the sample from inside the plant. Based on the analysis an awareness raising campaign was launched and recommendations for policy improvement were submitted to decision makers.