This survey was produced by Eco-Accord Centre with the participation of the following NGOs - Armenian Women for Health and Healthy Environment (Armenia), Ruzgar (Azerbaijan), Ecovision (Georgia), Independent Ecological Expertise (Kyrgyzstan), the Centre for Promotion of Sustainable Development (Kazakhstan), Greenwomen (Kazakhstan), Ecotox (Moldova), Volgograd-Ecopress (Russia), "Dront" (Russia), Chapaevsk Medical Association (Russia), the Fund for Support of Civil Initiatives (Tajikistan), ARMON Centre (Uzbekistan), and MAMA-86-Kharkov (Ukraine).

1. State of SAICM implementation

Since 2009, EECCA countries shifted to a qualitatively new level of implementation of the Strategic Approach to International Chemicals Management (SAICM). In the period from 2006 to 2009, SAICM-related activities were of a rather fragmentary nature, and only separate projects were implemented that were heavily dependent on available funds. Projects generally ceased after termination of their financing. In the majority of cases, the countries lacked understanding of the need to apply a more comprehensive and structured approach for achievement of sound chemicals management. However, the situation started to improve gradually after the second session of the International Conference on Chemicals Management in 2009.

In several EECCA countries, coordination centres for SAICM implementation were established under ministries and agencies in charge of chemicals management. Some coordination centres seek to cooperate with non-governmental organisations.

EECCA countries started to develop their national legislation for long-term strategic planning in the sphere of chemical safety. National environmental policy strategies incorporate objectives, key priorities and dimensions of national environmental policy and are accompanied by development of draft long-term National Environmental Action Plans.

Development of national chemical management profiles was an important step in the establishment of national chemical security policies - the profiles entail comprehensive surveys or existing national legal, institutional, administrative and technical infrastructures associated with rational use of chemicals. Such profiles were developed in Armenia, Belarus, Georgia, Kyrgyzstan, Kazakhstan, Moldova and Uzbekistan. In those countries, development of national profiles allowed the governments to ascertain/identify existing and potential chemicals-related problems, as well as available options to address the problems. The national profiles also allowed identification of gaps or shortcomings of existing systems, thus making initial steps in defining areas for future efforts in the sphere of improvement of national legislative frameworks. The profiles revealed potential duplicities in control systems and other manifestations of inefficiency hindering rational use of already available resources.

A major step forward in realisation of counties' abilities to implement SAICM was made in the course of national assessments of SAICM implementation capacity (National SAICM Capacity Assessments). Such assessments were produced in Georgia, Kyrgyzstan, Kazakhstan and Uzbekistan. Relevant documents incorporate Assessments of National Management Frameworks and Assessments of Capacity to Address Priority Problems of Sound Chemical Management.

In recent years, NGOs were increasingly active in implementation of SAICM-related projects. Since 2009, 16 projects were implemented in EECCA countries, including Armenia, Azerbaijan, Georgia,

Moldova, Ukraine, Russia, Tajikistan, Kazakhstan, Kyrgyzstan and Uzbekistan. These projects fully met IPEN priorities, namely:

- Identification of pollution (POPs and heavy metals) hot spots;
- Chemicals in products;
- Description of a national situation in terms of mercury contamination and/or identification of mercury contamination in food products; and
- Enhancement of public participation in decision-making on chemical safety matters.

NGOs often initiated mobilisation of funds of international donor institutions for their countries. As an example, we may refer to the initiative of NGOs of Tajikistan and Kyrgyzstan for development of national systems of chemicals' classification and labelling with their eventual harmonisation with the Globally Harmonised System of Classification and Labelling of Chemicals. These projects were approved by the Trust Fund of the SAICM Quick Start Program. Besides that, in response to an initiative of Tajikistan NGOs, the UNDP Small Grants Programme approved a project on analysing and strengthening the national environmental policy on mercury pollution. All these three projects were supported by national SAICM coordinators of Kyrgyzstan and Tajikistan.

Intensive activities of NGO-run SAICM focal points promoted the growing attention of governments to problems of toxic environmental contamination. As a result, Chemical Safety Commissions were established in several EECCA countries with the participation of NGO representatives. For example, in 2009, in Armenia, a SAICM Steering Committee was established under the Ministry of Nature Protection, and a specialised commission was established under the Ministry of Emergency Response to address safety problems of the burial site of obsolete and banned pesticides. The Ministry of Urban Development of Armenia established a commission in charge of municipal waste collection, transportation and neutralisation. It is worth emphasising that representatives of NGOs were incorporated into all the above Armenian commissions. In July 2012, in Kyrgyzstan, the Coordination Commission was established to facilitate safe management of chemicals. In addition to the first deputy PM and other deputy ministers, the commission also includes representatives of NGOs.

Such active participation of NGOs in activities of governmental chemical safety commissions promotes higher awareness of NGOs and the general public on different on-going and planned national processes and improves transparency of the decisions made. Besides that, NGOs have opportunities to promote their opinions actively and to insist on their positions at the high governmental level. As an example, we may refer to participation of EECCA NGOs in development of National Implementation Plans under the Stockholm Convention on POPs. For example, Eco-Accord NGO developed its recommendations in the sphere of public awareness-raising on POPs - the recommendations were incorporated into the Russian National Implementation Plan of the Stockholm Convention. In particular, Eco-Accord proposed to establish the Information Consortium on POPs and Implementation of the Stockholm Convention with participation of national authorities, NGOs, representatives of industries, local authorities, academic community and international organisations. Eco-Accord's recommendations particularly focused on synergies of chemical conventions and SAICM. These materials were presented at the session of the Inter-agency Working Group on the Stockholm Convention in March 2012 and were included into the draft of the Russian National Implementation Plan under the Stockholm Convention on POPs.

NGOs participated actively in the development and discussion of papers on chemical safety during the establishment of the regulatory framework of the EurAsEC Customs Union. In particular, the Center "Cooperation for Sustainable Development," being part of the Working Group on the safety of

chemical products, was involved in the development of technical regulations of the EurAsEC Customs Union for the safety of chemical products (which introduces the basic principles of the GHS within the Customs Union), the safety of synthetic detergents, as well as paints and varnishes. In the latter document, proposals on the elimination of lead in paint were made.

In October 2010 NGO «Ecoproject» (Belarus), Local Self-Government Development Centre (Kazakhstan), «Independent Ecological Expertise» (Kyrgyzstan) and Eco-Accord (Russia) initiated a CSO Forum on STRENGTHENING CAPACITIES OF CIVIL SOCIETY ORGANISATIONS FOR NATIONAL AND REGIONAL SAICM IMPLEMENTATION IN THE EECCA REGION. More than 40 NGOs working on SAICM implementation participated in the Forum. The discussion was based on the following main documents: Needs Assessment and Identification of Mechanisms for Efficient Dissemination of Information on SAICM among the General Public of the Republic of Belarus, Kazakhstan and Kyrgyzstan; Introduction to SAICM and latest achievements; SAICM and three chemical conventions: synergy and COP outcomes; EECCA NGO participation in the implementation of SAICM at the international, regional, national and local level; NGO position at SAICM regional meetings and other meetings related to SAICM implementation; and NGO resolutions on SAICM emerging policy issues. 17 presentations were made by NGO leaders from different NGO groups working on SAICM implementation. In addition, a Strategy for involvement of NGOs from Belarus, Kazakhstan and Kyrgyzstan on SAICM implementation for the period from 2011 to 2020 was presented. A Resolution was signed as the Forum outcome which was further presented to the EECCA Ministers on Environment at the Ministerial Environment for Europe Conference held in September 2010 in Astana.

In October, 2011, Independent Ecological Expertise NGO (Kyrgyzstan) developed its draft Concept for Development of Comprehensive Measures for Kyrgyz Republic in the Sphere of Mercury Management at All Stages of its Life Cycle. The document was circulated among CSOs representatives and submitted to the Government for review. Later on, the draft Concept was posted on the web-site of the KR State Agency for Environment and Forestry: www.nature.kg, and on the following web-sites: www.caresd.net, www.ekois.net, www.eco-expertise.org, www.nature.kg.

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

Notwithstanding some progress of activities in the sphere of chemical safety in EECCA region, there are some specific problems that need to be addressed urgently. Main problems that prevent efficient SAICM implementation in many EECCA countries include the following ones:

- Lack of national SAICM coordinators that might bridge efforts of different agencies and organisations for development of chemical safety systems;
- Lack of national centres for synergies of chemical conventions and SAICM;
- Poor coordination of activities of different ministries, agencies and organisations in charge of chemical management and ensuring chemical safety;
- Gaps in collection, exchange and provision of information on chemicals in relations between different agencies and organisations and in provision of the information to the general public;
- Low public participation in substantive decision-making on matters related to ensuring chemical safety;
- Almost all EECCA countries lack monitoring of chemical contamination of the environment as well as timely and accurate information on hazardous emissions and discharges from fixed pollution sources to air, water and soils. . There is no national Pollutant Release and Transfer Register (PRTR) in the EECCA which does not provide general public with the right on access to

environmental information. Some countries try to establish local PRTRs but they do not provide complete information about pollutant emissions and transfer in the countries. Though several EECCA countries have ratified the PRTR Protocol to the Aarhus Convention they are not in compliance with the Protocol requirements.

- ;
- Many EECCA countries lack systems for inventorying, classifying, recycling, neutralisation and elimination of industrial waste (including chemicals waste) that often pose public health hazards and contaminate the environment. Substantial accumulation of stockpiles of chemical waste is observed (including toxic waste);
- The majority of EECCA countries lack systems for classification and labelling of chemicals, as well as registers of potentially hazardous chemical and biological substances - such situations substantially complicate mitigation of adverse health and environmental impacts of hazardous toxic substances; and
- A poor technological and laboratory capacity of EECCA countries does not allow them to conduct epidemiological research studies on health impacts of chemicals or to analyse toxic contents in products (including consumer goods). The countries have almost never assessed risks of health impacts of hazardous chemicals, and as a result people are more vulnerable to impacts of some chemicals.

- The EECCA countries have lack or no system of providing compensation to workers suffering from occupational diseases and their families. This is true for all industrial processes including such generally accepted as asbestos mining, production and use. Countries have no system of providing compensation for non-employee cases when people get sick while living close to dangerous industrial facilities and even in case when their disease is strictly linked to exposure of toxic chemicals.
-

While numerous national level programs and projects were initiated in EECCA countries, general results in the sphere of ensuring chemical safety in the region still remain poor. The underlying causes are associated with uncoordinated activities of governmental agencies, their reluctance to share information and duplication of many efforts - all these factors hinder progress in addressing the problem. On the one hand, the case of the destroyed pesticide burial site in Armenia may be considered as a positive example - monitoring was ensured and the burial site was temporarily sealed after its destruction. But on the other hand, the case demonstrated the inability of responsible governmental bodies to respond in a timely way to a threat that entailed serious environmental contamination.

The majority of EECCA countries lack mechanisms to discuss lessons learned in the course of implementation of projects and programs. All EECCA countries conducted primary inventories of their stockpiles of banned and obsolete pesticides in the early years of this century, but later on these works decelerated. Repeated inventories in some countries revealed substantially higher amounts of banned and obsolete pesticides compared to earlier data. NGOs provided substantial information about real amounts of obsolete pesticides. Projects that helped NGOs to provide additional information on obsolete pesticides were implemented in Armenia, Azerbaijan, Russia and Ukraine. However, the situation is still far from being settled. No complete elimination of big obsolete pesticide burial sites and stockpiles has been conducted. No health monitoring of people leaving close to pesticide burial site has been conducted. Some projects initiated and implemented by NGOs confirm the negative impact of pesticide burial sites on the health of local residents. People increasingly often complain about respiratory problems, allergies, gastro-intestinal and cardiovascular diseases. Birth defects and prenatal development

pathologies were observed in the regions located close to pesticide burial sites. The overwhelming majority of respondents reported pathologies of the gastro-intestinal tract, nervous and cardiovascular systems. In addition, there were numerous complains about skin and eye irritation. It is worth noting a high incidence of endocrine disorders (e.g. diabetes and thyrotoxicosis). In addition, there were numerous cases of reported surgeries in connection with uterus adenomyoma, ovary polycystic disease and other malignant tumours. Older respondents tend to report health problems more often. In the case of surveyed women of the reproductive age, 51.6% of such respondents reported intoxication symptoms (skin irritation, rushes, dizziness, nausea, nose bleeding, allergies and asthma). Reproductive disorders inc. spontaneous abortions, premature birth, alterations of the menstrual cycle, stillborn cases, anaemia, birth defects, foetal asphyxia, etc. were observed among 56.7% of the surveyed women comparatively to 21.2% in the control group.

It is still necessary to focus on problems of long-term pesticide contamination of soil, water and food, caused by numerous pesticide storages at national territories, as well as elimination of large-scale pesticide burial sites.

The problem of stockpiles of obsolete pesticides in EECCA countries is associated with a grievous heritage of political leadership of the former USSR who sought to ensure total chemicalisation of all economic sectors. Many countries of the region inherited tens of thousands of tons of obsolete pesticides that - like "delayed action bombs" – now pose serious health and environmental hazards to all EECCA countries and their neighbours. From 2008 – 2010, research studies were conducted in the course of the World Bank project “Obsolete pesticides technical study in Kyrgyz Republic, Republic of Tajikistan and the Republic of Uzbekistan” at burial sites of obsolete pesticides "Navruz" and "Yangibazar" in Surkhandaryinskaya and Navoinskaya oblasts of Uzbekistan. The studies revealed serious problems, including technical quality of pesticide storages and 13 burials, quality of packaging materials for hazardous chemicals, cases of intrusion into burials and application of pesticide packaging for household purposes. It is clear that awareness-raising activities in the sphere of chemical safety are inefficient and local residents are not duly informed on adverse health and environmental impacts of pesticides.[1] The problem of pesticide-contaminated drums is considered as a serious one in EECCA. Local citizens often use empty drums to store potable water, vegetable oil or flour, as well as other types of food and animal feedstuff. Drums are partially thrown to the landfills, including illegal landfills. There have been cases of acute poisoning among people who used pesticide-contaminated drums for their household needs. Livestock poisoning was also registered in Tajikistan as a result of pesticide-contaminated drums use. According to the available information in Tajikistan, local citizens use about 40,000 pesticide-contaminated drums. In the frame of GEF/UNEP project on the development of National Implementation Plan to the Stockholm Convention on POPs in Tajikistan, 264 samples of missed pesticides and contaminated soils were analysed. Mainly DDT and its metabolites were diagnosed in the samples. In some regions many samples also contained aldrin, dieldrin, endrin, HCB and heptachlor. Thus preliminary inventory revealed 17,55 tons of DDT as well as 8266,6 rg of other POPs pesticides. Further inventory is needed to obtain more accurate data as well as analyse the health status of people affected by obsolete pesticides. In the frame of the IPEN project

[1] http://www.adb.org/documents/translations/russian/lss-strategy-ru.

in Tajikistan, a pesticide burial site (inc. DDT-based pesticides) in Vakhsh district of the country was observed. A fairly poor situation of the site was revealed- the burial site was looted and the toxic chemicals are easily accessible. The burial site was not guarded, it was not even fenced.

NGOs of EECCA countries many times insisted on the need to study routes of human exposure to toxic substances, to develop methodologies for assessment of health risks of pesticides and for identification of routes of human exposure to pesticides and other toxic chemicals. Development of such methodologies would substantially contribute to the development of implementation plans for improvement of environmental quality and human heath in countries of the region, particularly in communities where health impacts of toxic chemicals were ignored for decades and where storage sites of banned and obsolete pesticides are located.

Environmental agencies of EECCA countries poorly control import of hazardous chemicals and contamination of national territories by pesticides and other chemicals, including phenols, heavy metals, etc. It is necessary to address the problem of management of medical, household and electronic waste; as well as the problem of control of quality of imported food products, toys and consumer goods.

The problem of mining and export of raw materials is equally grave in EECCA countries. For example, Geopro Mining, Vallex group, Allumin Corporation, Geotim, Deno Gold Mining and Cronimed Mining extract mineral resources in Armenia, causing economic and irreparable environmental damages. These companies operate open cast mines with all associated consequences, including contamination of soils, air and water, and adverse health impacts. It is worthwhile to note a new trend observed in Armenia - new mining sites are launched at protected territories and in forested areas. The Government issues licences for new mining facilities without prior consultations with the general public and local residents, thus ignoring the human rights to safe and healthy environments.

Another important chemical security problem is associated with regular releases of toxic chemicals to the ambient air and accumulation of toxic waste. For example, according to the State Committee for Statistics of Uzbekistan, annual generation of consumption and production waste in the country reaches more than 100 million tons, including over 14% of toxic waste. In Ukraine, according to expert estimates, the overall amount of accumulated industrial waste reaches more than 25 billion tons, covering an area of over 160 thousand hectares. The level of industrial pollution (waste per land area) in Ukraine is 6.5 higher than in the USA and 3.2 times higher than in EU countries.

The situation in Azerbaijan is not much better. According to findings of the project implemented by NGOs in the framework of SAICM, the country annually generates over 1.5 million burned, broken and unusable fluorescent bulbs. However, these mercury-containing devices are still disposed of in municipal landfills (sometimes even in illegal waste dumps), where they are broken and release their mercury contents into the soil.

The problem of mercury contamination by broken mercury-containing instruments is rather acute in all EECCA countries. In particular, according to the Institute of Mineralogy, Geochemistry and Crystalochemistry of Rare Elements in Russia, every year from 1998 to 2002 up to 9 million mercury-containing thermometers were broken, releasing about 18 tons of metal mercury. Application of mercury-containing bulbs and thermometers in household settings, in childcare and public health

facilities results in numerous cases of mercury contamination. As budgetary facilities (education, public health and culture facilities) lack sufficient funds, they cannot transfer burned mercury-containing fluorescent bulbs to specialised utilisation facilities. As a result, these bulbs are accumulated and stored in inadequate sanitary conditions. A similar situation is observed at many industrial facilities that accumulated serious stockpiles of such bulbs for several years (from 150 to several thousand bulbs).

The problem of collection and recycling of e-waste is also very serious in the EECCA countries. In particular, in Kazakhstan, producers and suppliers of electrical and electronic waste are not responsible for collection and disposal of waste. As a result e-waste end up on municipal landfills and continuously pollutes ground waters and air during smoldering and toxic chemical degradation. In the meantime, citizens and business companies are interested to deliver e-waste to companies dealing with recycling. To address the problem of sound e-waste management, the principle of expanded producer responsibility should be included into national legislation of all EECCA countries.

Uncontrolled waste collection and processing pose serious health and environmental hazards, as does the incineration of municipal, industrial and medical waste (a source of releases of dioxins and furans). Many EECCA countries still lack facilities for organised waste collection, separation and processing. All types of waste (including wastes with hazardous substances) are collected in major cities at landfills, covered by soil or incinerated. In many EECCA states there is no system of waste inventory or waste classification, nor waste recycling and safe disposal. In some countries the problem of organic waste at landfills was partially resolved by methane generation and its use as a fuel, but inorganic waste continues to accumulate, facilitating infiltration of hazardous substances to soil and then to water.

Particular concerns are associated with practically inactive systems of public information on hazardous toxic chemicals in consumer goods including items for children and toys. Huge amounts of understandard goods reach EECCA countries by different ways, including children's toys and other items for children's use; however, almost no information is available on contents of hazardous chemicals in these goods. The EECCA market is dominated by Chinese toys. Most often the consumers complained of the following: bad smell, "easily crumbled", "electrical disturbance", "flammable" and color loss. Usually toys are analysed on the availability of toxic chemicals upon consumer request only. In the majority of EECCA countries regulation allows both uncontrolled operations of minor producers and import of small number of toys by private businessmen. The same troubling situation is observed in the case of cosmetics. For example, according to results of a research study conducted by Armenian Women for Health and Healthy Environment NGO, mercury was found in 82 of 100 samples of cosmetic items (skin-bleaching creams, soap, etc.), but the packaging provided no information on mercury contents.

Having serious concerns in connection with inflow of toys and other goods for children containing hazardous chemicals to EECCA markets, NGOs of the region issued a Statement to governments of EECCA countries, requesting:

- to ensure that national legislative acts meet the needs of guaranteed chemical, toxicological and hygiene safety of toys' contents;

- to ensure availability of a sufficient laboratory capacity allowing to control compliance of all batches of children's toys with the due applicable regulations;

- to ensure marking of toys with clear description of their chemical composition and recommendations on their safe use and disposal;

- to maintain strict control of toys' contents, to control safety of toys regularly and carefully, covering products of both national and foreign producers;

- to prevent entry of children's toys with hazardous chemical components to national markets;

- to abandon the practice of selling children's toys at uncontrolled marketplaces, to provide preconditions for their sale in specialised sales facilities only;

- to establish a regional working group for development of a system of notification on presence of hazardous chemicals in toys at all stages of their production and use (from producers of toys to consumers and to disposal (recycle) of waste);

- to implement a broad public information campaign in the countries on safety of children's toys; to ensure involvement of all stakeholders into the campaign.

The Statement was submitted to representatives of EECCA countries in the course of Environment for Europe Conference in September 2011. Notwithstanding the importance of the problem highlighted by NGOs, it is still not incorporated into the range of priorities of EECCA countries.

Problems of implementation of SAICM provisions in EECCA countries are further aggravated by a passive position of representatives of these countries at the international level. The passivity manifests itself at almost all meetings and negotiations in the framework of key chemical treaties and SAICM. Besides that, proposals of EECCA countries in the CEE (Central and Eastern Europe) region are blocked by representatives of EU countries. Being EU member-states they cannot decide without prior consultations with the EU. As a result, EU decisions practically dominate in regional SAICM groups, complicating the approval of progressive decisions. Such a situation was observed in June 2011, at the regional SAICM meeting in Poland. IPEN proposed recommendations on hazardous substances in electric and electronic items, recommendations on chemicals in goods, recommendations on lead in paints and a resolution on nano-technologies - all these documents were of major importance for the CEE region. While in 2010, the recommendations on hazardous chemicals in electric and electronic items were adopted by the regional meeting of CEE countries, in 2011 proceedings of the group were actually paralysed. EU member-states refused to adopt the proposed documents without preliminary agreement by the EU. Representatives of EECCA countries at the meeting highlighted the importance of the IPEN documents, but none of them were adopted.

3. Inventory of NGO activities supporting SAICM implementation

SAICM Objective	**NGO Activity and Results**	**Names of NGOs**	**Country**
Risk Reduction			
	Facilitate the promotion of non-combustion technologies of obsolete pesticide phase-out in Russia	Volgograd-Ecopress	Russia

	Survey of bisphenol A in Russian foods	Chapaevsk Medical Association	Russia
	Alternatives to medical waste management	AWHHE	Armenia
	Investigation of mercury in skin lightening creams	AWHHE	Armenia
	Heavy metals in fish products	ECOTOX	Moldova
	Role of NGO in prevention of mercury pollution in Azerbaijan	Ruzgar	Azerbaijan
	Global Mercury Monitoring Project	AWHHE, ECOTOS, Volgograd-Ecopress	Armenia, Moldova, Russia
	Global Lead in Paint Project	Greenwomen, Eco-Accord, HAZER	Kazakhstan, Russia, Armenia
	Introducing Code of Conduct In Order To Reduce The Environmental and Health Risks From Pesticides	AWHHE	Armenia
	Elimination of acute risks of obsolete pesticides in Ukraine	UNENGO "MAMA-86"	Ukraine
	Elimination of toxic pesticides in Lviv region	Environment-People-Law (EPL)	Ukraine
	Preliminary inventory of POPs and other chemicals, analysis of chemical contamination of food products	Surhan, Forish, Ecoservice, Chance, Women for Sustainable Development (Insenim)	Uzbekistan: Karakalpakstan, Surhandariy, Horezm, Andijan, Jizzah, Navoi Sirdary, Tashkent region

	Waste to profit: sound municipal waste management	Armon, Consumer Rights Protection	Tashkent, Uzbekistan
Knowledge and Information			
	Public Participation in the Civil Society Forum on Involving civil society and business community into "Green growth" policy promotion: Priorities, solutions, perspectives"	Eco-Accord, Greenwomen	Russia, Kazakhstan
	Toxic Free Toys Information Campaign	AWHHE, FRI, Eco-Accord, Greenwomen, Independent Ecological Expertise, MAMA-86	Armenia, Belarus, Russia, Kazakhstan, Kyrgyzstan, , Ukraine
	Mercury country situation report and awareness-raising on SAICM implementation in Ukraine	Mama-86-Kharkiv	Ukraine
	Awareness-raising campaign on SAICM implementation in Ukraine (2010—2012)	UNENGO "MAMA-86"	Ukraine
	How Much Do We Know About POPs in Eastern Europe and Russia?	Chapaevsk Medical Association	Russia
	Consultations and information meetings on asbestos	Volgograd-Ecopress, SPES, Eco-Accord, Novorossik children, Novorossisk youth organization "Centre of Environmental	Russia

	Side event on Green Mechanisms and Green Decision in Mining: Move to Green and Sustainable Economy at Asia and Pacific Region Ministerial Conference in Astana, 2010	Ecoforum NGO Kazakhstan, Eco-Accord, WECF	Kazakhstan, Russia, Germany
	Raising awareness on legal environmental rights; Educational module on environmental legislation for local communities in rural areas	Armon	Uzbekistan
	High-level Conference on asbestos	Mama-86	Ukraine
	Raising public awareness on chemical impact on human health – seminars for students	Hazer, AWHHE	Armenia
	Seminars on chemicals and health and SAICM requirements	AWHHE	Armenia
	Educational modules on SAICM	Independent Ecological Expertise	Kyrgyzstan
	Educational modules: PRTR development; Toxic Free Future Coal	Greenwomen	Kazakhstan
	Video materials, documentaries on toxic chemicals and wastes	Armon	Uzbekistan
Governance			
	Development a Communication Strategy for the Russian National Implementation Plan to the Stockholm Convention on POPs	Eco-Accord	Russia
	Synergy of three conventions: workshop on SAICM and three chemical conventions, elaboration of recommendations	Eco-Accord, SPES, Ecotox, MAMA-86, Independent	Russia, Moldova, Ukraine, Kyrgyzstan
	Participation in the development of the National Chemical Profile and SAICM Capacity Assessment in Uzbekistan	Armon, Eco-Accord	Uzbekistan, Russia
	National Action Plan for Khaidarkan mercury mining: Strengthening Environmental Policy and Implementing	Independent Ecological Expertise	Kyrgyzstan

	To promote sound chemical management at the regional level to prevent mercury pollution of the Volga river and Caspian	Volgograd-Ecopress	Russia
	Analysis of electronic and electric waste disposal system in the Republic of Kazakhstan	Social Fund "Promotion of Sustainable	Kazakhstan
	Improving waste management legislation	Environment-People-Law (EPL), "MAMA-86"	Ukraine
Capacity Building			
	NGO Forum "Strengthening Capacities of Civil Society Organisations for National and Regional SAICM Implementation in the EECCA Region"	Ecoproject, Independent Ecological Expertise, Greenwomen, Centre of Development of National Self , Governance, Eco-	Belarus, Kyrgyzstan, Kazakhstan, Russia,
	A side event on chemical safety and green growth during the 7th Ministerial Conference "Environment for Europe"	Eco-Accord, Independent Ecological Expertise	Russia, Kyrgyzstan
	Chemical education in the context of chemical safety: problem and perspectives	Mama-86	Ukraine
	International High Level Expert Conference on Chemical Safety and Rotterdam Convention: Policies and	UNENGO "MAMA-86"	Ukraine
	Analyzing the Situation of Asbestos Use and its Health Impact in Russia	Eco-Accord, Volgograd-Ecopress, Eco-SPES NGO, Novorossik children and youth organization "Centre	Russia
	Capacity building on Obsolete and POPs pesticides	AWHHE	Armenia

Illegal Traffic			
	Investigation of illegal toxic waste import to Ukraine	Bureau of Environmental Investigation (BEI)	Ukraine
	Illegal pesticide use in Central Asia: Sirdarinsky region, Uzbekistan	Armon	Uzbekistan
	Transboundary obsolete pesticide pollution in Uzbekistan from Suzaksky stockpiles (Kyrgyzstan) and Kanibadamsky stockpile	Armon	Uzbekistan

4. NGOs actions on emerging policy issues

1. SAICM emerging policy issue: Electronics

Analysis of electronic and electric waste disposal system in the Republic of Kazakhstan

Leading NGO: Social Fund "Promotion of Sustainable Development", Kazakhstan

The Project is aimed at analysis of the existing electric and electronic equipment (hereinafter – EEE) waste disposal system in the Republic of Kazakhstan taking Almaty City as an example, and drafting of recommendations on system improvement.

The following tasks were carried out in order to achieve the Project objective:

1) The regulatory framework of the Republic of Kazakhstan in regards to EEE waste management was analyzed;
2) The existing EEE waste disposal practices in Almaty City were assessed; and
3) Recommendations on EEE waste disposal system improvement were prepared.

Detailed report is available upon request.

2. SAICM emerging policy issue: Chemicals in products

Survey of Bisphenol A in Russian foods

Leading NGO: Chapaevsk Medical Association, Russia

Food samples were collected in three different towns of Russia, 7 samples per site

- Moscow – capital of Russia, foods from large supermarket
- Samara – large city, 1.3 ml population, foods from supermarket
- Chapaevsk – small city near Samara, chemical center (organochlorine pesticides production), foods from small grocery store and mini-market

Assay using Gas Chromatography-Mass Spectrometry (GC-MS) for bisphenol A analysis was developed with good sensitivity and accuracy

- 21 food samples from 3 different Russian cities were analyzed
- BPA was determined in 17 of 21 samples (81%)
- Highest level was determined in canned (tin) food including
  - infant poultry pure "Tema" (35,22 ng/g)
  - Infant chicken and beef pure "Agusha" (21.52 ng/g)
  - Canned tomatoes "Zelyony Velikan (42,9 ng/g)
  - Canned beef "Tushenka govyazhya osobaya" (19,39 ng/g)
- BPA was also determined in baby's dummy
  - Baby's latex dummy "Lubby" (17,04 ng/g)
- The average level of BPA in Russia was similar (slightly higher) to that of the level of BPA for beverages and infant formulas published in Canada
- No significant difference between BPA levels in food in different Russian cities was revealed

3. SAICM emerging policy issue: Lead in Paint

Three NGOs participated in IPEN's Global Lead in Paint Campaign:
Eco-Accord, Russia
Greenwomen, Kazakhstan
Hazer, Armenia

Samples of paints were collected according to the instructions provided by IPEN Lead in Paint Project coordinator and sent to the laboratory in the USA for further analysis. Results are available upon request.

5. Interesting case-study examples of SAICM implementation

1. **National Action Plan for Khaidarkan mercury mining: Strengthening Environmental Policy and Implementing Outreach Campaign in Kyrgyzstan**

Implementing organization: Independent Ecological Expertise, Kyrgyzstan

Introduction

Civil society organizations can make a significant contribution to the objectives of sustainable chemicals management by taking a direct part in the development of policies, legislation, and programs, by implementing specific projects, and involving the general public to support the goal and objectives of SAICM and related chemical conventions. The project facilitated broad national discussions on the National Action Plan on Khaidarkan mercury mining and ensured strong NGO involvement into updating and strengthening of the Action Plan. It significantly contributed to environmental policy changes in Kyrgyzstan and improved the efficiency of this strategic document.

In October, 2011, the Public Association "Independent Ecological Expertise" started to implement the Project «National Action Plan for Khaidarkan mercury mining: Strengthening Environmental Policy and Implementing Outreach Campaign in Kyrgyzstan».

Objectives of the Project

- Collection and processing of available information in area of mercury management at all phases of its life cycle in the Kyrgyz Republic.
- Analysis of this information in order to identify problems and prospective of development in area of regulation of mercury and its compounds turnover on territory of Kyrgyzstan in line with international challenges.
- Awareness-raising among the population and state institutions on negative impact of mercury and its compounds on human health and environment.
- Elaboration of recommendations for design of the national action plan on mercury management at all phases of its life cycle and re-profiling of the Khaidarkan mercury plant.

According to the set objectives, the following results were achieved.

1 phase

Letters-requests were submitted to the government institutions to get required information on turnover of mercury and its compounds in the territory of Kyrgyzstan including the Khaidarkan mercury plant. Replies received were placed on the website of the "Independent Ecological Expertise" www.eco-expertise.org.

2 phase

Data processing, including information received from the state bodies, and data analysis were completed. The draft "Concept on measures for mercury management at all phases of its life cycle in the Kyrgyz Republic" was developed based on data obtained by the "Independent ecological expertise". Draft "Concept" was disseminated to the representatives and organizations of civil society, submitted to the Government and the Jogorku Kenesh of the Kyrgyz Republic for consideration. It was also placed on the website of the State Agency of Environmental protection and Forestry of the Kyrgyz Republic: www.nature.kg, and the sites: www.caresd.net, www.ekois.net, www.eco-expertise.org.

3 phase

The "Independent Ecological Expertise" and the Network on protection of the public ecological interests in the Kyrgyz Republic initiated an advocacy campaign on collecting of signatures under the Appeal to the President, Government and Jogorku Kenesh of the Kyrgyz Republic regarding the need to strengthen control and implement urgent measures to minimize the negative impact of mercury and its compounds in the country. The Appeal was sent to the President, Government and Jogorku Kenesh of the Kyrgyz Republic. All the information on the above-mentioned activity is on the websites:

www.caresd.net, www.ekois.net, www.eco-expertise.org.

4 phase

On February 17, 2012, the roundtable "Key problems and perspectives of mercury management at all phases of its life cycle" was held. Representatives of the Government of the Kyrgyz Republic, the Parliament of the Kyrgyz Republic, the ministries and institutions, business structures, NGOs, international agencies and educational and scientific institutions and mass media took part in this event. The main goal of the roundtable was to attract attention of the governmental institutions to issues related to mercury management in the Kyrgyz Republic and elaborate mutual steps forward.

During this event, the participants discussed problems concerning the negative impact of mercury on human health and the environment and issues related to mercury and mercury containing waste management in the Kyrgyz Republic based on the draft "Concept". Also, problems and prospective of the Khaidarkan mercury plant were highlighted. Results of the roundtable were published and broadcasted by the media.

On March 15, 2012, the roundtable "Discussion of the Energy Saving Program in the Kyrgyz Republic for the period till 2015: environmental aspects" was held where the "Independent ecological expertise" provided comments to the Program. It highlighted important issues which were missing, including, inter alia, the need to focus on sound management of energy-saving lamps containing mercury. The need to implement measures starting from safe transportation, and storage to collection and environmentally friendly elimination of mercury containing lamps were highlighted. Representatives of the expert community, governmental institutions, international and public organizations and mass media attended this event.

During project implementation, different stakeholder meetings were held and inquiries were sent to the governmental institutions in order to receive information regarding production activity of the Khaidarkan mercury plant, export of mercury and import of mercury containing goods. The following outcomes were achieved:

- ⇒ Process of development of the ecological passport of the Khaidarkan mercury plant was launched.
- ⇒ A draft "Concept" was considered by the Government and the Jogorku Kenesh (Parliament) of the Kyrgyz Republic. Based on draft "Concept", the Head of the Apparatus of the Government

of the Kyrgyz Republic obliged the Ministry of Economy and Antimonopoly Policy of the Kyrgyz Republic and the State Agency of Environment Protection and Forestry under the Government of the Kyrgyz Republic to prepare a draft Resolution of the Government of the Kyrgyz Republic "On setting up the inter-agency working group to develop a complex of measures on mercury management at all phases of its life cycle in the Kyrgyz Republic" and setting up the inter-agency working group.

The project helped to attract the attention of key decision-makers and state authorities to address problems on mercury impacts on human health and the environment, including:

- Representatives of the Government of the Kyrgyz Republic
- Ministry of Economy and Antimonopoly Policy of the Kyrgyz Republic
- State Agency of Environmental Protection and Forestry
- Representatives of the Khaidarkan mercury plant
- Representatives of the expert community in area of chemical management and chemical safety
- Representatives of the public organizations
- Mass media
- Individuals

At present, the set-up of the Inter-governmental working group has been launched. This group will develop an action plan on mercury management. Composition of this working group was defined – the stakeholders were invited. Within the project, a communication strategy was developed to promote environmentally significant decisions on the reduction of negative mercury impacts on health and the environment.

The following documents were prepared:

- Draft "Concept on development of set of measures on mercury management at all phases of its life cycle";
- Letter-appeal to the decision-makers on urgent measures regarding mercury control in Kyrgyzstan;
- Conclusions of the public ecological expertise of the project "Program of energy-saving in the Kyrgyz Republic for the period till 2015».

Informational support was provided during the whole project implementation. Materials highlighting consequences of negative mercury impacts on human health and the environment and problems associated with mercury production at Khaidarkan plant were presented to the media. The issue of utilization of mercury containing waste was highlighted. Informational and educational activities were conducted through the media in order to raise public awareness on the potential risk of use of mercury containing goods at home and to protect people's environmental rights.

2. **Identification of pesticide hotspots in Sirdarinsky region, Uzbekistan**

Implementing organization: Armon

The aim of the project was to assess the technical quality of obsolete pesticide burial sites in Syrdaryinskaya oblast of Uzbekistan and evaluate risks associated with health and environmental impacts of the sites.

A brief summary of project results:

- Environmental monitoring was conducted to identify sources of environmental risks causing major adverse health impacts in Syrdaryinskaya oblast.
- Environmental risks were assessed and ranked.
- Several working meetings and a seminar were held in Sardoba township and in Tashkent with participation of representatives of local communities and initiative groups of Syrdaryinskaya oblast.
- A focus group was formed.
- Working relations were established with governmental bodies, Sanitary and Epidemiological Services, the Ministry of Public Health and local communities.
- The list of most pressing problems in the oblast was formed, which includes - quality of drinking water supply and application of POPs in agriculture, inc. illegal application of obsolete pesticides from obsolete pesticide burial sites.
- Technical quality of Mirzaabadskiy obsolete pesticide burial site was assessed and locations of former agricultural aviation airstrips were identified.
- A preliminary technical quality assessment was made for obsolete pesticide burial sites in Syrdaryinskaya oblast.
- The underlying legislative framework of POPs management was reviewed.
  After completion of field studies, some storage facilities with obsolete pesticides were identified that had not been incorporated into official inventory data.

The research studies allowed us to identify major failures in the management of OPs and OPs storages at former agricultural aviation airstrips that are widely spread in all districts of Syrdaryinskaya oblast. The OPs storages identified and the OPs burial site under control of "Uzkimiesanoiat" State Facility give us reasons to conclude that the currently applied chemical security measures are not sufficient. Armon believes that the following measures should be taken in a longer term:

- To develop a draft Law on Environmental Control, stipulating sanctions for non-compliance in the sphere of chemical security;
- To ascertain the precise number of pesticide burials and storages in the oblast, as we were not able to cover the whole territory of the oblast in the course of the project implementation;
- To assess and rank their technical quality;
- To develop feasibility studies for remediation of the most hazardous sites (according to specific local conditions, hazardous substances should be eliminated on-site, in order to avoid repackaging, transportation and temporary storage costs); and
- On-site liquidation of OPs on sites under remediation works and/or in burials would allow the elimination of waste and recultivation of soils in parallel.

I believe that it is not appropriate to transport OPs to some centralised storages for elimination, as in the course of transportation operations, pesticides might be spilled or blown away by winds. Besides that, their on-site elimination in burials would be much cheaper and safer.

Potential and hidden risks associated with residual pesticide contamination of soils at former pesticide burial sites may be reduced in the medium term by bio- and phyto-remediation. Prior to application of

these methods, it is rather important to minimise consequences of wind erosion of surface soil layers at OPs burial sites. First, consolidation of new (upper) soil layers would prevent further wind-induced spread of OPs. Bio- and phyto-remediation methods are effective only at consolidated soils. Higher organic contents in soils and irrigation of upper layers of soil would minimise consequences of wind erosion and enhance effectiveness of bio- and phyto-remediation.

3. To promote management at the regional level to prevent mercury pollution of the Volga river and Caspian coastal area

Implementing organization: Volgograd-Ecopress

According to the project activities, consultations were held with representatives of local environmental authorities of Astrakhan and Volgograd regions, including Service of Natural Resources and Environmental Protection, environmental prosecution, Rospotrebnadzor, Rostekhnadzor, Rosprirodnadzor, and local industrial facilities engaged in the collection and transportation of mercury-containing waste, including mercury containing light bulbs (MCW). During the negotiations and discussions with officials, the following problems were revealed:

- There is no centralized system of MCW collection and transportation from the private sector and municipal organisations;
- There is no adequate data of the number of facilities and organizations generating MCW;
- Lack of necessary funds to collect and transport MCW from the social (municipal) organisations in Astrakhan region and Volgograd region; and
- Very low or no awareness on mercury threat to human health and the environment among the citizens of the coastal area, which results in bad practice of handling MCW at the household level.

To address the problems raised above, it was necessary to analyze the experience of neighboring regions in the treatment of MCW. In order to study the situation on mercury waste management the following materials were analyzed:

- Official websites of local authorities working on waste management (http://www.doncomeco.ru/news, http://admk.kuban.ru, http://www.krd.ru/)
- Interviews with local environmental authorities
- Information received from companies involved in MCW treatment
- Scientific publications
- Internet resources (http://news.webrostov.ru/ news/4286976 , http://www.rtut-arb.ru, http://www.kcvm.ru).

Based on this information a survey on MCW management was prepared that unites the experience from Rostov Region, Volgograd Region, Krasnodar Region and Kalmykiya. The survey addresses the following issues: environmental governance, including financial aspects of MCW collection, transportation and disposal; the number of facilities and organizations generating MSW; experience in MCW treatment.

A booklet of 1000 copies about MCW danger for human health and the environment was prepared. Its main readers are local citizens, including those living in the costal area, as well local administration.The workshops were organized to identify and discuss the problems of mercury-containing waste management in the Caspian region and Astrakhan region and to develop the final document containing proposals and recommendations to address identified problems. Participants were selected on the basis of interest and representation of state control, environmental authorities, organizations involved in the direct treatment of MCW, general public and media.

Particular attention was paid on MCW management in the context of compliance with environmental legislation.

An "Appeal to the Government of Astrakhan Region" was prepared based on the discussion at the workshop. It contains proposals and recommendations to the administration of the Astrakhan region, and the administration Volodarsky, Ikryaninsky, Kamyzyaksky and Limansky districts of the Astrakhan region to optimize mercury waste management. All proposals were submitted to the administration of the Astrakhan region and its districts.

The workshop in Volgograd was attended by representatives of five companies dealing with MCW processing. Workshop participants requested local authorities to start a broad public information campaign on sound MCW management. Department of the Environment of the city administration promised to prepare special guidelines on MCW collection in Volgograd.

The implementation of this project provided decision makers responsible for MCW management with a reasoned, analyzed and research-based approach to address mercury contamination of the environment. All stakeholders (control environmental bodies, sanitary and epidemiological services, local authorities, facilities and organizations involved in MCW management) received detailed information about good practice experience on MCW management. After the workshop local authorities of the target regions expressed their intention to start developing systems of MCW collection.