International SAICM Implementation Project (ISIP)

In 2010, in an effort to demonstrate SAICM implementation via IPEN Participating Organizations, IPEN launched an International SAICM Implementation Project, also known as ISIP. ISIP aims to mobilize resources for initial enabling activities pertaining to national priorities, in keeping with the work areas set out in the strategic objectives of section IV of the SAICM Overarching Policy Strategy.

In particular, the ISIP supports the Governance objective of SAICM’s Overarching Policy Strategy paragraph 26, which calls for enhanced “cooperation on the sound management of chemicals between Governments, the private sector and civil society at the national, regional and global levels.”

In addition, ISIP builds on the 2008-2009 Global SAICM Outreach Campaign to raise awareness about SAICM and strengthen collaboration among the public interest, health and labor sectors.

ISIP Objectives

ISIP’s four objectives include:

• Promoting the need for sound chemicals management
• Advancing National SAICM Implementation
• Promoting global SAICM implementation by global civil society
• Building capacity among NGOs developing countries and countries with economies in transition

Title of activity: Waste Incineration Residues, a Significant Source of POPs in the Czech Republic

NGO: Arnika – Toxics and Waste Programme

Country: Czech Republic
Date: October 2012

Elements of SAICM Covered:

Identify, explain problem, make initial recommendations on how to address the problem, may be linked to public awareness-raising about the issue; Facilitate the identification and disposal of obsolete stocks of pesticides and other chemicals (47, 68)

There is serious problem with handling of waste incineration residues in the Czech Republic as it is very often declared to be either construction material or non-hazardous waste. For construction materials there are both less strict limits and legislation applied than to the use of wastes on the surface, which is often the case.
This problem becomes even more important when more new large municipal waste incinerators are planned to be built in the Czech Republic as well as in other CEE countries.

Basic solution to this problem is to avoid waste incineration and deploy waste minimization and waste recycling instead. Another option is to introduce technology(-ies) which is (are) able to destroy the complex chemical structure of persistent organic pollutants contained in the waste incineration residues such as, for example, polychlorinated dioxins and furans or hexachlorobenzene.

We have promoted a zero waste approach instead of waste incineration as part of our project/campaign.

**Provide a physical description of the site**

50°54'52.65"N  
15° 2'57.99"E

Site contaminated by waste incineration residues is located near Czech borders with Poland downhill from engineered waste landfill near the town Frydlant. It is approximately 30 km from the city Liberec, where there is a large municipal waste incinerator located, the original source of mixed fly and bottom ash. That mixture was spread in the creek valley, not very far from a pond used for fishery. One can expect that dioxins would accumulate in fish catch in that pond. It is also partly surrounded by pastures and POPs could contaminate that area as well. However, no evidence of that has been determined due to low funds for analyses.

**Give a history of the site**

This contaminated site is not very known yet, so there hasn’t been any government action so far. We raised awareness about the site and we expect to see the government reaction to the problem. It is not clear when waste incineration residues were spread in the creek valley. We estimate it was approximately 5 – 6 years ago.

**Description of the chemical characterization**

Dioxins (PCDD/Fs), PCBs and PAHs were found in samples of waste incineration residues mixed with soil. Analyses were carried out and published within our project.

**Description of the environmental and health consequences**

There is potential threat of contamination of food chain via fish or cattle as described above, but there is no evidence yet. Regarding fish it would be difficult to show potential contamination, because all fish from the pond were caught last year.

**Description of who is responsible for the site**

The owners of the land as well as the owner of the creek (state, local authorities and state owned company Forests of the Czech Republic) are responsible for the site. Lack of stricter rules for management of waste incineration residues harms the food chain, so the state is responsible for potential contamination due to lack of protective rules.

**Description of the plans for cleanup**

There is no plan for clean-up as the site is not considered to be contaminated.

**Project Outcomes:**

**Description of the activity conducted**

Our activities aimed to raise awareness about the site as well as about the issue of waste incineration residues in general, so we didn’t focus only on hot spot-related actions, but also we took part in discussions about plans to build new waste incinerators and about revision of the
National Implementation Plan of the Stockholm Convention. So our project also covered aspects related to general waste management in the Czech Republic.

**Sampling and chemical analyses from the site of illegal waste incineration residues dumping**

Arnika sampled the site where we discovered illegal dumping of waste incineration residues as described above. These samples were sent to the certified laboratory mainly for analyses on dioxins (PCDD/Fs), PCBs and PAHs. Results were used for awareness raising campaign and published through mass media on the occasion of happening in Jihlava (see further activities).

**Workshop for Czech NGOs**

A workshop on POPs wastes and waste incineration was organized for Czech NGOs with 22 participants. Arnika raised the problem of inappropriate handling of waste incineration residues and content of POPs in these wastes. It became a part of the joint declaration from that workshop. New network “Pro 3R” was established at that meeting.

Workshop was held in Prague -11th and 12th February 2012

Here are photo-galleries from the workshop:
http://arnika.org/workshop-nespaluj-recykluj-2
http://arnika.org/workshop-nespaluj-recykluj-1

**Discussions on newly proposed waste incinerators in the Czech Republic**

Members of Arnika in cooperation with local NGOs and engaged citizens took part in public hearings and stakeholders meetings about newly proposed waste incinerators in Jihlava, Plzeň – Chotíkov, Komařany near the city Most, Přerov, Černošín and Stříbro. At each of the meetings we also raised the issue of inappropriate handling of waste incineration residues in regard to their content of POPs and potential damage to the environment related to this practice.


**Comments to National Implementation Plan to Stockholm Convention (NIP SC)**

There is ongoing preparation of an updated NIP for the Czech Republic. NGOs were not part of that process before Arnika’s intervention to the Ministry of the Environment. Arnika prepared a draft of comments to the new NIP and submitted those after discussion with other NGOs to the MoE at the beginning of April 2012.

**Awareness-raising campaign on the topic of POPs in waste incineration residues**

Arnika published press releases on each of above mentioned events as well as for all press conferences and happening listed below (11 in total), either addressing POPs waste in relation
to newly planned waste incinerators or inappropriate handling of POPs-containing waste incineration residues. Part of the awareness-raising campaign on the topic of POPs in waste incineration residues was also participation in public hearings (see activity above). Four press conferences related to the topic of this project were also organized. For all these purposes power point presentations were prepared (first time presented at NGO workshop – their broader version), and updates of website were done. We have also launched a petition in December 2011 which calls also for stricter control of handling waste incineration residues. Petition was already signed by more than 2,5 thousand inhabitants.


Additional activities

We have also examined free access to information about environment when we asked for copies of the reports on implementation of IPPC (Integrated Pollution Prevention Control) permit granted to the waste incinerator. We obtained these copies and used them during our project as source of information. We searched for data about other potential POPs wastes stored somewhere else in the Czech Republic and found potential sites for further research. We have also participated in the procedure for permit for co-firing the POPs wastes in a cement kiln in Čižkovice, North Bohemian region. All our concerns were dismissed by state authorities, so we started a case against their decision. This case was not decided by the end of the project. This activity was important as it sets precedent for co-firing of other POPs wastes in cement kilns in large quantities in the Czech Republic.

Impact on target groups:
Public in the cities and towns surrounding the localities where the new waste incinerators are planned, as well as mass media in these regions (including region of the hot spot), were our major target groups. We were successful in engaging and holding a dialogue with the public and most active people got engaged so far that they established new NGOs or local initiatives. Another success of our project is the establishment of a new network of NGOs and other non-governmental stakeholders focused on promotion of recycling of wastes instead of their incineration. Coverage by mass media was also quite good; however, our campaign was too short to influence decision makers. We have also engaged NGOs in preparation of comments to NIP update.

Impact on target policies:
The overall objective of this project was to support IPEN's activities in discussion about “low POPs content” level with the aim to protect public health and environment. Our activity has supported this discussion, because it discovered new data about waste incineration residues.

Specific objectives were as follows:

1) To bring new data into discussion about “low POPs content” and to raise awareness about inappropriate handling of waste incineration residues containing dioxins, PCBs and other POPs in the Czech Republic.
Our project has generated new data as it discovered a new case of inappropriate handling of waste incineration residues and new chemical analyses of these wastes were carried out. There is also new data about handling waste incineration residues in the Czech Republic available for IPEN's work. Additional and unexpected outcome of the project is also data and court case regarding the permit for co-firing of POPs wastes.

2) To support NGOs in their campaigns promoting waste management that doesn’t create new POPs, so preferably municipal waste recycling and zero waste approach, primarily in the Czech Republic with potential replication in other CEE countries.

Our participation in discussions as well as comments to the NIP followed this objective. We also kept saying this message in all press releases, and it is part of the petition text as well. So we think our project contributed to this objective, however it was too short to change state and/or EU policy on waste management.

3) Active involvement of NGOs in preparation of updated NIP SC.

Without this project there would have been almost no NGOs involvement in preparation of the updated NIP to Stockholm Convention.

As it is visible from descriptions of how we followed the objectives of the project, it was almost impossible to change national policy on topic of waste management; however, it influenced discussions at different regional levels and turned attention to the problem of waste incineration residues. It remains unresolved; however, there is ongoing discussion on this topic at both state as well as regional levels.

There was raised awareness about the problem and also it was used to prevent projects for new waste incinerators. In one case the project was almost stopped.

Outreach to stakeholders:
Decision makers (deputies) at both regional and local level are more aware of problem with POPs content in waste incineration residues and potential threat of its inappropriate handling.

Mass media helped NGOs to raise awareness about POPs in waste incineration residues and potential risks related to their inappropriate handling.

Czech NGOs are more familiar with the issue of POPs content in waste incineration residues and will be able to better use the arguments about POPs released by waste incinerators into their wastes for their own work. The workshop for them built up their expertise capacity. A network of NGOs was established in order to help them to coordinate activities preventing building of new waste incinerators.

Czech Ministry of Environment received the comments from NGOs network coordinated by Arnika on National Implementation Plan to Stockholm Convention. NGOs are waiting for the MoE’s reaction to see if any of their comments will be incorporated into the final version of the NIP.

Deliverables, outputs and/or products:
Participation in 6 public hearings/discussions/meetings of stakeholders
1 workshop for NGOs (2 days) – 11th-12th February, 2012
7 power point presentations
1 happening – 27th March
4 press conferences
11 press releases
4 new chemical analyses for dioxins, PCBs and PAHs in samples taken from hot spot near Frýdlant
Brief (1 - 2 page) report about the results of chemical analyses (in Czech) in more popular way used for deputies in Jihlava Region
Comments to National Implementation on Stockholm Convention
23 news stories on website
5 new photo-galleries on website
Over 40 press cuttings
4 shots in Czech TV; 6 shots in radio broadcasting
Petition with over 2,5 thousands signatures
New NGOs’ network established
Network’s list serve created and kept working

**Communication Efforts:**
We have organized press conferences, taken part in public meetings/hearings, and organized a petition. All these activities gained general public attention, many times via mass media.

There are 5 new photo-galleries at Arnika’s website created during the project – they can be found at [http://arnika.org/foto-spalovny](http://arnika.org/foto-spalovny):

*Odběr vzorků odpadu z liberecké spalovny - Frýdlantsko*
V polovině března provedla Arnika odběr vzorků popílku z liberecké spalovny. Popílek neskončil na skládkce, ale byl vyvežen do volné přírody. Místo se nachází ve Frýdlantském výběžku a v jeho…

*Co vyrobí spalovna*
27.3.2012
Krajští zastupitelé dostali 27. března 2012 od Arniky ukázku odpadu, který vyprodukuje plánovaná spalovna. Tisková zpráva. Foto: Jan Losenický

*Diskuse k plánované spalovně v Jihlavě*
23.2.2012
Fotogalerie z veřejné diskuse k plánované spalovně v Jihlavě, která proběhla 15. února 2012. Novinka. Foto: Jindřich Petrlík, Arnika
Additional photos were taken during different actions.

**NGO Recommendations for next steps:**
We believe there is a need for continuous pressure on state officials as well as on the European Commission to change the rules and limit values for waste incineration residues. Promotion of waste recycling and zero waste approach is needed instead of the promotion of waste incineration as a solution for handling wastes in both national and European policies. These are ways to prevent creation and releases of new POPs. The damage was already done at the studied site, so it can be used only as precedence for other such cases within Czech Republic, but also in any other country. Waste incineration residues should not be certified as materials for construction.

There is also a gap in the REACH regulation as it doesn’t reflect the problem of low dose concentrations of chemicals such as dioxins (PCDD/Fs) in materials, and therefore mixtures of fly ash and bottom ash can be declared as safe under REACH.