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

NGO: Independent Ecological Expertise

Country: Kyrgyzstan

Date: July, 2012

Elements of SAICM Covered:

Promote reduction of the risks posed to human health and the environment (57); Help develop comprehensive national profiles or country situation reports about mercury (1, 166); Programs to monitor mercury to assess exposure (66, 82); Promote the development and use of products and processes that pose lesser risks (44); Take immediate action to reduce the risk to human health and the environment posed on a global scale by mercury in products and production processes (59); Participation in activities related to the negotiation of a legally binding instrument on mercury

Description of mercury that is available in the market:

Some of the most common products containing mercury are sold at the markets of Kyrgyzstan: luminous tube lamps, arched discharge and bactericidal lamps, mercury thermometer, accumulator battery, galvanic cells, and rectifiers and relays, which are used at enterprises, organizations and households. In the Republic, data on quantity and quality of used mercury-containing goods is actually lacking.

More detailed information of mercury contained in goods can be found in the results of the survey "Analysis of the consumer goods market regarding mercury content in the Kyrgyz Republic" (Bishkek and Issyk-Ata, Chui oblast), which was conducted by the experts of the public association "Independent ecological expertise" and specialists of the Department of State Sanitary-Epidemiological Surveillance" of the Ministry of Health of the Kyrgyz Republic in 2010 within the IPEN Global Campaign "Free from mercury - You, Me and Children" in 8 countries, including the Kyrgyz Republic.

Description of the most common forms of mercury exposure:

Mining complex exposures are the main hazard for human health and the environment in the Kyrgyz Republic, particularly for the population living in the dwellings located in vicinity of the Khaidarkan mercury and antimony deposit, especially Aidarken and Chouvai towns where primary mercury is mined.

Also, the used mercury-containing goods contribute to a negative impact – because of lack of practice of their collection and utilization. As a result, already used mercury-containing goods are disposed of at the household waste landfills.

Description of human sources of mercury:

Main sources of mercury polluting the environment in Kyrgyzstan are:

1. Production activity and waste of production of the Khaidarkan mercury and antimony plant;

Kyrgyzstan is only the country currently producing a significant amount of mercury to export abroad. The Khaidarkan mercury and antimony plant continues its activity in spite of lack of safe, environmentally friendly storage of waste, dilapidation and non-compliance with modern technical requirements of production technologies, and environmental pollution (air, water, soil), with indicators exceeding maximum accepted concentration of mercury.

2. Already-used mercury containing goods;

Today, technology handling mercury-containing waste is absent in the Republic.

3. Use of mercury in primitive gold production;
4. Cement production;
5. Use of coal as a fuel.

At present, it is impossible to estimate even roughly an annual release of mercury in the environment as a result of the use of mercury in primitive gold production, cement production and coal combustion because of lack of a monitoring system in this area.

Description of the levels of mercury release and exposure:

National systems of environmental monitoring and/or social-hygienic monitoring are not developed in the Republic; actually, data on the number and quality of used mercury-containing goods are not available since observation data is lacking as well. Information on registration of mercury poisoning, which is a cause of health deterioration, is presented poorly.

Description of the damage caused by mercury:

As it was mentioned above, key sources of mercury poisoning can be air, soil, and water pollution located around the Khaidarkan plant as a result of its production activity, and waste from mercury-contacting goods. It causes direct threats to human health and the environment of the Republic.

The workers and personnel of the Khaidarkan plant are exposed to mercury poisoning. Dust and exceeded concentrations of gaseous mercury are key factors of occupational disease among the employees of the enterprise.

Within a structure of occupational diseases, the highest morbidity rate is among the seizure disease - 43%, bronchitis - 39%, mercury intoxication - 17,8%¹.

Description of the laws currently regulating mercury:

In the Kyrgyz Republic, there are a number of regulatory / legal documents of various levels, including the international treaties (such as the Basel Convention) defining requirements to import, register, and assess hazardous chemicals and waste, as well as assess the impact of economic activity on the environment and human health, and they are enforced by different governmental agencies. All these legal acts are mainly the framework regulations and reflect general requirements on impact prevention of unfavorable factors of environment.

Requirements related to the removal of mercury and its compounds, risk assessment criteria of the impact of mercury and its compounds on human health and environment, criteria of banning its use on the country's territory, requirements of classification and labeling are not identified in existing legislation.

Description of the efforts to deal with mercury:

In 2009, an inter-agency working group was set up by the Resolution of the Government of Kyrgyz Republic in order to elaborate "Action Plan on production of the primary mercury and its environmental impact in the Kyrgyz Republic" (101- as of 10.03.2009). Based on prepared social-economic and technical-economic reviews of the region, "The Action Plan on production of the primary mercury and its environmental impact in the Kyrgyz Republic" was elaborated.

"The Action Plan on production of the primary mercury and its environmental impact in the Kyrgyz Republic" was approved through the Resolution of the Government of the Kyrgyz Republic as of October 12, 2009, 583- .

The Global Environmental Facility (GEF), the United Nations Environmental Programme (UNEP), the United Nations Institute of Training and Research (UNITAR), and the Governments of USA, Switzerland and Norway expressed their interest to implement this Plan.

According to the Resolution of the Government of the Kyrgyz Republic 200- as of October 8, 2010, signed by the President of the Kyrgyz Republic Roza Otunbaeva, "the Resolution of the Government of the Kyrgyz Republic as of October 12, 2009, 583- is recognized as abolished". The reason for abolishing the plan was the pressure from the facility. As a result, the document was not accepted.

¹ "Social-economic assessment of primary mercury production in Khaidarkan", 2009.

In June 2011, the delegation of the donor organizations and the governments visited the republic, but they were not received in the Apparatus of the Government of the Kyrgyz Republic, the Ministry of Economic Regulation of the Kyrgyz Republic (at present, the Ministry of Economy and Anti-monopoly Policy of the Kyrgyz Republic) and the Ministry of State Property of the Kyrgyz Republic (at present, the State Property Fund under the Government of the Kyrgyz Republic). The delegation visited the Ministry of Foreign Affairs of the Kyrgyz Republic, the Ministry of Natural Resources and the State Agency of Environmental Protection and Forestry (SAEPF) under the Government of the Kyrgyz Republic, where it was supported.

After that, the State Agency for Environmental Protection and Forestry (SAEPF) submitted the National Action Plan on re-profiling of the Khaidarkan mercury and antimony plant for consultations. The plan was not accepted by the ministries and agencies and was not approved. During process of consultations, confrontation between some ministries, representatives of the Khaidarkan plant and designers of this plan aimed to close the enterprise, occurred. As a result, the Plan was rejected. There was a need for broad awareness-raising among all stakeholders on problems related to mercury's impact on the environment and human health and design of "the Concept on development of measures for the Kyrgyz Republic related to mercury management at all phases of its life cycle".

At present, the project of the Global Environmental Facility (GEF) "Reduction of local and global environmental risk associated with mercury mining in Kyrgyzstan" has been launched. The project is supported by UNDP, UNEP, and UNITAR, under financial support of Norway, Switzerland and USA, and it will be submitted to GEF for main financing.

Description of what forces support and oppose the Mercury Treaty, the public participation consultation process, and the level of public awareness of the treaty process:

Kyrgyzstan participated in all three meetings of the intergovernmental committee on development of legal-binding document on mercury control. Unfortunately, up to date, the country does not work out a coherent position in relation to this document and undertake any actions in terms of minimization of dangerous impacts of mercury in the Republic.

Project Outcome:

Description of the activity conducted:

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 prospects for development in the area of regulation of mercury and its compounds' turnover in the territory of Kyrgyzstan in line with international challenges.

- ◆ Awareness-raising among the population and state institutions on negative impacts of mercury and its compounds on human health and the 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 set objectives, 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 Kyrgyzstan, including the Khaidarkan mercury plant:

- ◆ Jogorku Kenesh (Parliament) of the Kyrgyz Republic;
- ◆ Government of the Kyrgyz Republic;
- ◆ Ministry of Energy and Industry of the Kyrgyz Republic;
- ◆ Ministry of Economy and anti-monopoly policy of the Kyrgyz Republic;
- ◆ State Agency of Environmental Protection and Forestry under the Government of the Kyrgyz Republic;
- ◆ State Agency on Geology and Mineral Resources under the Government of the Kyrgyz Republic;
- ◆ State Inspection on Environmental Security and Technical Safety under the Government of the Kyrgyz Republic;
- ◆ Office of the General Prosecutor of the Kyrgyz Republic;

Replies received are placed on the website of the public association “Independent Ecological Expertise” www.eco-expertise.org.

2 phase

Data processing, including of information received from the state bodies, and data analysis:

- ◆ Regulatory / legal documents in the field of nature protection legislation, ecological standards and regulations, taking into account international experience to prevent and mitigate negative ecological consequences of mercury and its compounds, considering regional conditions and international requirements;
- ◆ Existing materials regarding ecological and economic risk associated with activity of the Khaidarkan mercury plant;
- ◆ Material on mercury-containing goods and waste in Kyrgyzstan.

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 experts of the public association “Independent ecological expertise” (draft “Concept”) – Annex 3. Draft “Concept” was disseminated by E-mail to the representatives and organizations of civil society, and submitted to the Government and the Jogorku Kenesh of the Kyrgyz Republic for consideration.

Draft “Concept” was 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 public association “Independent Ecological expertise” and the Network on Protection of the Public Ecological Interests in the Kyrgyz Republic have initiated a

campaign to collect signatures under the Appeal to the President, Government and Jogorku Kenesh of the Kyrgyz Republic regarding control and urgent measures undertaking the minimization of the negative impacts of mercury and its compounds in the country (Annex 4).

The Appeal was sent to the President, Government and Jogorku Kenesh of the Kyrgyz Republic. All information on the above-mentioned activity is located at: 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, educational and scientific institutions and mass media took part in this event. Main goal of the roundtable was to attract attention of the governmental institutions to issues related to mercury management in the Kyrgyz Republic and have them address those issues.

During this event, the participants discussed problems concerning negative impacts 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 perspectives about the Khaidarkan mercury plant were highlighted. Results of the roundtable were published and broadcasted in the mass media.

On March 15, 2012, the roundtable “Discussion of the energy-saving program in the Kyrgyz Republic till 2015: environmental aspects” was held, and experts of the public association “Independent ecological expertise” provided a conclusion to the public about the program (Annex 5). The aim of the roundtable was to bring to the attention of the designers of this document and the public that important components are missed in the program; for example, environmental security and chemical safety. First of all, it is necessary to reject lamps containing mercury from use. For lamps existing on the market, special attention should be paid to a set of measures starting from safe transportation and storage, to collection and environmentally friendly utilization of mercury-containing lamps. Representatives of the expert community, governmental institutions, international and public organizations and mass media attended this event.

Impact on target groups:

The state bodies and decision-makers in the chemical management area were the main target audience.

During the project activity, meetings were held and letters / inquiries were sent to the public institutions in order to receive different information regarding the production activity of the Khaidarkan mercury plant, export of mercury and import of mercury-containing goods. The following outcomes were achieved via a process of formal correspondence and as a result of communication campaigns:

- ⇒ Process of development of the document describing the environmental situation at the Khaidarkan mercury plant, including the environmental impact assessment, was launched since it was lacking from the beginning of the project implementation.
- ⇒ Designed draft “Concept” was considered in 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.”

⇒ Our project helped to raise awareness about mercury hazards and increase interest among decision-makers in addressing the problem.

Impact on target policies:

During the project activity, the public association “Independent ecological expertise” conducted the following strategic line: to attract the maximum number of decision-makers and state authorities to address problems regarding mercury’s impact on human health and the environment with active involvement of the civil society.

Following results have been achieved:

According to developed draft Resolution of the Government of the Kyrgyz Republic “On setting up of the Inter-agency working group on elaboration of complex of measures for mercury management at all phases of its life cycle in the Kyrgyz Republic”, it is necessary to design an Action Plan on mercury management for the Kyrgyz Republic and submit it to the Apparatus of the Government of the Kyrgyz Republic.

The Unit of development of agro-industrial complex of the Apparatus of the Government of the Kyrgyz Republic is obliged to control compliance of this Resolution.

The Inter-agency working group is composed of:

6 ministries, 2 state agencies under the Government of the Kyrgyz Republic, the Customs Service, the State Property Fund under the Government of the Kyrgyz Republic and the Independent Ecological Expertise as NGO representative.

Outreach to stakeholders:

In terms of the project implementation, all key stakeholders and sectors having direct relation to problems addressing mercury management aspects in the Kyrgyz Republic were engaged and involved:

- 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
- Local communities

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

Deliverables, outputs and/or products:

- 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 till 2015».

Communication efforts:

Informational support was provided during the whole project activity. Materials highlighting consequences of negative mercury impacts on human health and the environment and problems associated with production activity of the Khaidarkan plant were presented in the mass media. Also, the theme of utilization of the mercury containing waste was highlighted. Informational and educational activities were conducted through mass media in order to raise public awareness on potential risks of use of mercury-containing goods at home and to protect the rights of citizens to have a healthy environment.

Informational materials published in the mass media:

TV channels

1. Reportage on consequences of use of mercury-containing lamps in public enterprises and households, TV channel «Fifth channel», February 17, 2012.

Newspapers

2. Article «Life around the mercury», newspaper «Vecherny Bishkek», February 20, 2012: http://www.vb.kg/paper/2012/02/20/179518_jyt_vokryg_rtyti.html
3. Article «Mercury is a horror», newspaper «MSN», February 23, 2012: <http://www.msn.kg/ru/news/37092/>
4. Article «Paper economy does not requires a mind and money», newspaper «Vecherny Bishkek», March 19, 2012: <http://members.vb.kg/2012/03/19/enerj/1.html>

Electronic mass media

5. Article «KYRGYZSTAN: the stakeholders discussed problems of minimization of negative mercury impact on human health and environment» February 20, 2012, www.caresd.net: <http://www.caresd.net/site.html?en=0&id=25092;>
6. Information on event holding placed on the website www.312.kg , www.24.kg;
7. Information in news of the website www.kabar.kg «Problem of mercury impact on human health will be discussed in Kyrgyzstan», February 16, 2012 <http://www.kabar.kg/rus/health/full/27794;>
8. News on the website www.kirtag.kg «NGOs insist to re-profile production of the Khaidarkan mercury plant», February 17, 2012: http://www.kyrtag.kg/?q=tags/khaidarkan_rtut_kombinat_proizvodstvo_pereprofilirovanie;
9. Results of discussion of the roundtable “Program of energy-saving in Kyrgyzstan: ecological aspects» are placed on the website www.ekois.net, www.caresd.net: <http://www.caresd.net/site.html?en=0&id=25157> .

Presentations presented at the roundtable held on February 17, 2012 are placed on the websites www.ekois.net, www.caresd.net:

- Global agreement on mercury control

- Mercury-containing products and their waste: Kyrgyzstan, brief review.
- Khaidarkan mercury plant: problems and perspective
- Mercury management during its life cycle in Kyrgyzstan: recommendations.

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Recommendations, from a public interest, NGO perspective, on reducing and eliminating human sources of mercury:

Development of a set of measures aimed to reduce unfavorable mercury impacts on human health and the environment at all phases of its life cycle, which was initiated through activity of this project, was demanded. It will be a good groundwork for further implementation of the measures on efficient control and minimization of emissions of mercury in environment, banning of uncontrolled trade of mercury, including primitive gold refinery, through the quickening and minimization of production and trade of mercury-containing goods.

In future, the public association “Independent Ecological Expertise,” being a member of the “Network on Protection of Public Ecological Interests in the Kyrgyz Republic,” will take part in design of this set of measures within the Inter-agency working group and actively participate in promotion of ideas on reduction of negative mercury impacts caused from man-made sources.