

Obsolete storages as a future part of PRTRs?

Mara Silina and Elena Vasilyeva/European ECO Forum
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Reporting on diffuse sources

Para 14: “The inclusion of diffuse sources is a one of core element of a PRTR. Diffuse sources means the many smaller or scattered sources from which pollutants may be released to land, air or water, whose combined impact on those media may be significant and for which it is impractical to collect reports from each individual source (article 2, paragraph 9).”

Para 15:” Parties need to identify possible sources and make decisions with regard to their national priorities....Estimating the possible impact of a diffuse source of pollution on human health and the environment might help to identify national priorities.”

Recommendations

Para 16: “To ensure completeness of reporting with respect to PRTRs where diffuse sources have not been integrated into PRTR system, Parties should start the inclusion process”

European ECO Forum survey on obsolete storage places:

- * 12 questions
- * 12 EECCA countries
- * responses from 7 countries
- * only some examples included in the current presentation



Armenia - Elena Manvelyan/Armenian Women for Health and Healthy Environment

Belarus - Natalya Blyshchik/Ecoidea

Kazakhstan - Lydia Astanina/Greenwomen Association

Kyrgyzstan - Oleg Pecheniuk/NGO Ecological expertise

Russia - Elena Vasilyeva/Volgograd Eco-Press

Tajikistan - Muazama Burkhanova/Foundation for support of Civil Initiatives

Ukraine - Olga Tsygulyova/Mama-86

- 1. Do you have obsolete storage places (chemicals, industrial waste etc.) in your country, region or close neighbourhood?**
- 2. Where are they located (storage type)?**
- 3. What substances are located there?**
- 4. Who was responsible for these obsolete stocks in the past?**
- 5. Who is responsible for them now (if any)?**
- 6. How do they pollute the environment at the moment?**
- 7. In which public information sources this information is stored?**
- 8. How frequently this information is updated in these public information sources?**
- 9. Please rate on a 10-point scale, how complete and detailed the information is?**
- 10. Does the law foresees access to this information, including at the request of public organizations and citizens?**
- 11. How much the access to this information is limited by business conditions and secrecy?**
- 12. Are there problems with the reliability of the information? If so, what?**

1. Do you have obsolete storage places (chemicals, industrial waste etc.) in your country, region or close neighbourhood? YES

ARMENIA: special storage place with more than 500 tons of banned and obsolete pesticides. Additionally, in different other storage facilities there are about 50 tons of such pesticides. There is also storage place for hazardous industrial waste, containing Arsenic (Alaverdi, Lori Marz) but no exact data on this.

KAZAKHSTAN: In total in Kazakhstan there are 5 functioning and 7 closed repositories. Strategic industrial and defence facilities with stationary electrical equipment often filled with PCBs (polychlorinated biphenyls). Much of the waste remaining at Ust-Kamenogorsk condenser plant from production PCB condensers and rehabilitation activities after the ban of PCBs in 1989 was drowned in the waste ponds of the plant.

RUSSIA: has a large number of places where waste from past activities is stored. The biggest of them - conserved sludge collector of "Khimprom" titled "White Sea" (covered with lime and lime-containing waste which began to form in the 50s) with a length of 1.4 km and a width of 150-200 m, 4 million tons.

UKRAINE: there are 931 objects where 308.07 thousand tons of hazardous chemicals are stored or used in the production.

2. Where are they located (storage type)?

KAZAKHSTAN: Akmola, Kostanay, Almaty and Pavlodar oblasts. In 2009, new burial grounds in Uralsk (landfill industrial and toxic waste 1, 2, 3 classes of danger) and Almaty regions

KYRGYZSTAN: The bulk of industrial toxic waste associated with the mining industry is in the territory of Issyk-Kul (61.4%) and Batken (25.8%) regions. In Issyk-Kul oblast, the amount of waste has increased dramatically since 1997 due to the commissioning of the gold mining company

RUSSIA: sludge storage placed in open areas, sometimes they are equipped with protective screens. Part of stockpiles of banned and obsolete pesticides is stored in special warehouses. However, there are many pesticide disposal sites in the open countryside (buried in the ground)

TAJIKISTAN: Landfills are opened, unguarded. In 2012-2013, Committee on Environmental Protection (CEP) under the Government of the Republic of Tajikistan (RT) covered open stocks with soil. In 2015 CEP RT barraged Kanibadam and Vakhsh landfills of POPs

UKRAINE: high concentration of industrial waste is in mining basins - Donetsk, Krivoy Rog, Lviv-Volyn and partly in other regions. The area they occupy, more than 160 - 165 thousand hectares. Due to the lack of sufficient equipment and grounds for removal, disposal and destruction of hazardous waste in most regions of Ukraine they are stored on the territory of enterprises, or removed in the unorganized storage space

3. What substances are there?

ARMENIA: More than 30 different types of pesticides, including 60% of organochlorine pesticides: DDT, hexachlorocyclohexane and others

BELARUS: waste from recycling of mercury lamps, used tires, possibly polychlorinated biphenyl (PCB), pesticides, chemicals, toxic waste of class 1-2, solid communal waste banned from disposal in landfills, waste from potassium production and residues (sludge) from wastewater treatment

KYRGYZSTAN: Over a long period of economic activity in Kyrgyzstan has accumulated a large number of industrial waste containing heavy metals (cadmium, lead, zinc, mercury, antimony), toxic substances (cyanide waste, acids, silicates, nitrates, sulfates, etc.) as well as obsolete pesticides

RUSSIA: Sludge containing chlorides, calcium, phenol, toluene, mercury, methyl chloride, chloroform, methylene chloride. DDT, HCH (hexachlorocyclohexane), Granosan (mercury-containing pesticides) etc.

UKRAINE: The most common hazardous chemicals in the chemical industry in Ukraine are: ammonia, chlorine, nitrogen dioxide, acrylonitrile, sulfur dioxide, concentrated nitric and sulfuric acid, methanol, benzene, urea ammonium nitrate, sodium hydroxide, formalin etc.

4. Who was responsible for these obsolete stocks in the past?

ARMENIA: In Soviet times it was the Ministry of Agriculture, in particular the Association ARMSELHOZ CHEMISTRY, later in the 90s - ARMBERIYUTYUN Association, which is currently not operational

BELARUS: producers of waste

KYRGYZSTAN: the owner of the waste

RUSSIA: previously sludge storage was under the responsibility of the enterprises in which they were produced but then became municipal property together with the land

TAJIKISTAN: the Ministry of Agriculture

5. Who is responsible for them now (if any)?

ARMENIA: the Ministry of Territorial Administration and Emergency situations

BELARUS: “Complex (facility?) for processing and disposal of toxic waste” shall be responsible for the operation a toxic waste polygon, Beloruskalij, sewage treatment facilities

KAZAKHSTAN: Different services

KYRGYZSTAN: In the absence of the owner of the waste, most of them are transferred to the balance of the Ministry of Emergency Situations. This mainly refers to the sludge from mining complex

RUSSIA: Pesticides stored in large warehouses often are operated by agencies of the Ministry of Agriculture and Rosprirodnadzora and organizations on whose territory are these warehouses. Those buried in the ground are under the responsibility of municipalities. Responsible for the elimination of stockpiles of obsolete chemicals is the Ministry of Industry and Trade and Rosprirodnadzor (under the state program)

TAJIKISTAN: Committee on Environmental Protection under the Government

UKRAINE: Business entities. for ownerless waste - local governments

6. How do they pollute the environment at the moment?

ARMENIA: Currently, the repository does not pollute the environment because they were strengthened during the past 4 years. But since burial is in an active landslide zone, there is a risk of contamination

BELARUS: salinization of big territory, groundwater pollution, soil

KYRGYZSTAN: Most of storage sites of industrial (including mining) waste are located in trans-boundary river basins (Naryn, Mailu-Suu Sumsar and Chu), which is a significant risk factor for countries like Kyrgyzstan, Kazakhstan, Tajikistan, Uzbekistan (direct risk for more than 5 million people). Many sludge storage places are located in close proximity to human settlements (Mailu-Suu, Min-Kush, Shekaftar, Sumsar, Kaji-Say, Ak-Tuz, Caen)

RUSSIA: During the rainy season the accumulated waste storage site "washed" with water and enter more deeply into the soil or into nearby water bodies. In the Volgograd region in summer in dry and windy weather the contents of burials is carried by the wind. Sometimes from poorly equipped and unguarded pesticide warehouses local population picks up and uses them in the farms (in the absence of funds for the purchase of new plant protection products)

TAJIKISTAN: Public access to pesticides, the use of private farms, sales at local markets. Have a negative impact on the environment (pollution of soil, air, water) and public health (food, illness, etc.)

7. In which public information sources this information is stored?

ARMENIA: On the website of the Ministry responsible for monitoring

KYRGYZSTAN: Statistical Yearbook "Environmental protection" The site of the National Statistical Committee of Kyrgyzstan <http://stat.kg/media/publicationarchive/0ba24e92-e021-4553-80e0-9c8ec79ceb08.pdf>. "National Report on the State of the Environment for the years 2006-2011" approved by the Decree of the Government of the Kyrgyz Republic from August 7, 2012 number 553. sayt State Agency for Environmental Protection and Forestry under the Government <http://nd.nature.gov.kg/ru/>

RUSSIA: Information about the accumulation of waste from past activities is contained in the annual reports on the state of the environment prepared at the federal level and at the level of each region. The texts posted on the Internet. But, at its best, there is general information about the amount of waste, without going into detail on the substances

UKRAINE: 1. The national report on the state of the environment in Ukraine (Ministry of Environmental Protection, annually). 2. Regional Ekological passports (annually). 3. State of communal waste treatment in Ukraine (Ministry of Regional Development of Ukraine, annually) 4. Reports of the State Statistics Service of Ukraine etc.

8. How frequently this information is updated in these public information sources?

ARMENIA: Not more than once a year

KAZAKHSTAN: In connection with the last reform of state structures, the Ministry of Environment was abolished in 2014 and its powers transferred to the Ministry of Energy, Sanitary and Epidemiological Service, the Ministry of National Economy of Kazakhstan, Committee on Consumer Protection. Previously used formats of placing information in the public domain have ceased to exist, the new one are formed

KYRGYZSTAN: NSC data must be updated annually. State Agency on Environment Protection and Forestry under the Government of the Kyrgyz Republic must submit national reports on the state of the environment of the Kyrgyz Republic to the Government of the Kyrgyz Republic until July 1 of the year following the reporting month, with the frequency - once in three years

RUSSIA: Rarely

UKRAINE: Monthly, quarterly, annually

9. Please rate on a 10-point scale, how complete and detailed the information is? Quite subjective

ARMENIA: 8 points.

KAZAKHSTAN: 5

KYRGYZSTAN: it is very subjective but no more than 3

RUSSIA: Industrial waste - 1; obsolete and unusable pesticides - 4

UKRAINE: 5-7

Note: 10 points being the best

10. Does the law foresees access to this information, including at the request of public organizations and citizens? YES

ARMENIA: access provided under the Aarhus Convention

KAZAKHSTAN: access provided

KYRGYZSTAN: The existing legislation of the Kyrgyz Republic gives the public the right to information, including environmental information

TAJIKISTAN: yes, in the principles of the Aarhus Convention, the laws "On Environmental Protection" (2007), "On Environmental Protection (2011), et al.

RUSSIA: Yes, the law provided

UKRAINE: Yes

11. How much the access to this information is limited by business conditions and secrecy?

ARMENIA: No limit

KAZAKHSTAN: In Kazakhstan there is an information center, with a base of different studies are available on a fee basis

KYRGYZSTAN: access to primary information is limited by the legislation on statistics

RUSSIA: Legislation to access data has the same restrictions as the rest for environmentally relevant information. Most serious problem for the public is the completeness and accuracy of the information because government agencies do not have it, too

12. Are there problems with the reliability of the information? If so, what?

ARMENIA: All information is deemed reliable

KAZAKHSTAN: For example, in the Internet you can find different figures on the number of hazardous waste on the territory of Kazakhstan, provided by different departments

KYRGYZSTAN: Most often problems raise due to the lack of reliable data. No monitoring system in place

RUSSIA: Yes, there are problems with reliability. There is no precise information on the qualitative and quantitative composition of these wastes because they have accumulated over several decades, especially in the early years; accurate records of incoming waste in these places are not kept. Moreover, in cases of liquidation and reorganization of enterprises where these wastes occurred, the documentation was often lost. Furthermore, storage of different types of waste (especially pesticides) is not isolated from each other -so, between them there is an uncontrollable chemical reaction

UKRAINE: No problem

Some preliminary conclusions

1. All countries involved in the survey have such obsolete storage places
2. Detailed information about these places is often lacking
3. The information is scattered, stored in different departments, in different institution, hardly updated
4. Different ministries, departments etc. responsible for these places - not always clear who
5. Public sources have the basic information, but do not have detailed information on types of chemicals and pesticides and, especially, on the substances
6. EECCA countries have unaccounted storage of obsolete waste. Inclusion of obsolete stocks in the PRTRs would be a tool that encourages the identification and registration of these storage places

NEXT STEPS (not in a priority order)

1. seek for similar experience from countries that had such problems in the past and learn from them how these problems have been solved
2. make a good analytical review and reporting of information on these obsolete storage places on the basis of information from governmental agencies and different sources, including UNECE, UNEP and other organisations/institutions
3. Possibly involve countries in SEE and continue work with countries in EECCA region
4. International workshop or seminar on this subject (may be together with some international organisations working on these issues, like UNEP, relevant MEAs etc.)
5. Possibly organize a thematic session during one of the upcoming meetings of the WGP to the PRTR Protocol
6. discuss possibilities and different options for inclusion of obsolete storage places in the PRTRs
7. Fundraising for continuation of this work

Thank you!

For more information, please contact

Mara Silina
co-chair European ECO Forum

mara.silina@eco-forum.org