



## IRAQ

# Project: Strengthening institutional structure for the management of chemicals and waste in Iraq

Independent Assessment of the Closed Projects under the Special Programme Report (December 2022)

## RESULTS

### Overall Assessment

The effectiveness of the project was high as all project objectives were largely met. The project supported the sound management of chemicals and wastes by developing a new national chemicals registry, conducting trainings, reorganizing the internal structure of the Department of Chemicals Management and creating four intersectoral committees. In addition, it supported decision makers to develop and update the legislative and financial framework, and contributed to Iraq's ratification to the Minamata Convention.

**Implementing partner:**  
UNEP Regional Office of West Asia working with Ministry of Environment

**Agreement timeframe:**  
May 2017 to December 2021

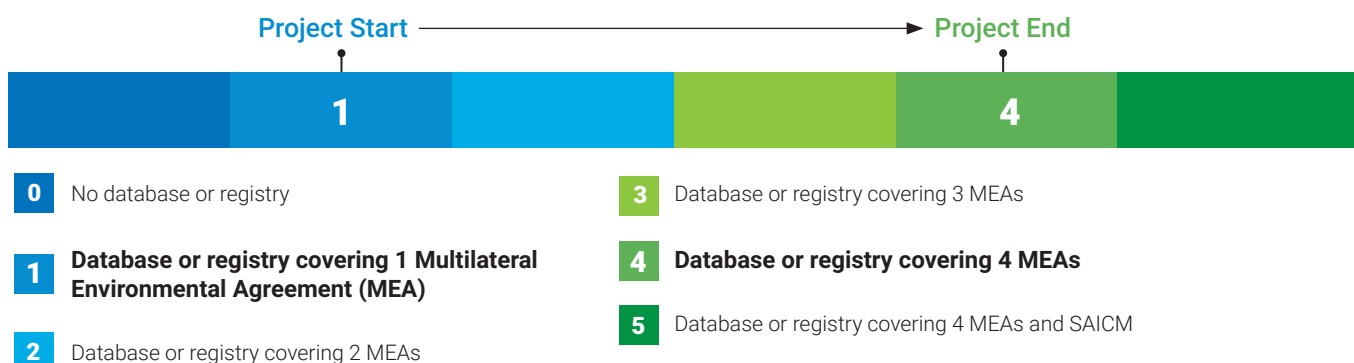
**Budget:** 250,000 USD

### Results & progress by Core Indicator Criteria

The project covered seven of the existing eight Core Indicator Criteria, namely:

#### Criterion 1.1: Level of development of national chemical/waste database

##### RAITING



### SPECIFIC RESULTS:

- The project developed a *Concept Note and Design of a National Chemical Registry for Iraq*, which laid the groundwork for an improved data collection of hazardous chemicals and provided significant information for guiding national authorities to start establishing the comprehensive chemicals register for the country. As a result, a **new national chemical registry** has been in the progress of development. The registry is currently operating with the existing annual inventories on chemicals. There is, however, still demand for further budget to reach the status of a complete registry. In addition, IT capacities are still needed to have the system fully operational. The new registry represents a considerable improvement as it replaces the previous chemical control mechanism which solely covered the import of chemicals<sup>1</sup>.
- In addition, the project applied GHS<sup>2</sup> and MSDS<sup>3</sup> to classify chemicals and hazardous waste. As a result, **two chemical management tools were developed**: i) *List of updated banned and restricted pesticide by the Ministry of Agriculture* and ii) *Hazardous chemicals waste classification controls for the oil industry, industrial and service sectors*.

## Criterion 1.2: level of necessary for chemical/waste management expertise

### RAITING

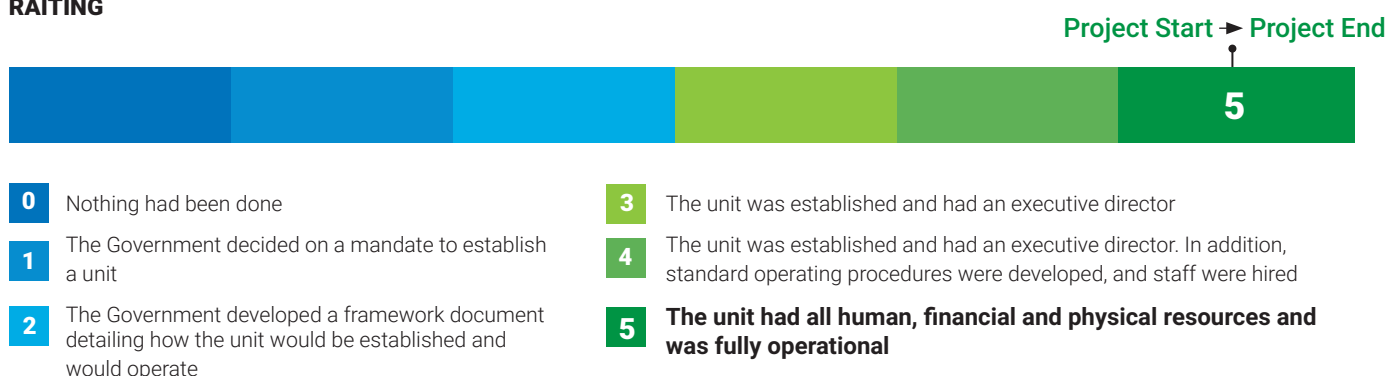


### SPECIFIC RESULTS:

- The project developed two background reports<sup>4</sup> which guided the elaboration of the following **training activities** that strengthened institutional capacities of staff:
  - review and a capacity building online workshop<sup>5</sup> on the development of a national register for chemicals in Iraq;
  - capacity building workshop<sup>6</sup> for the project development and funding for the environmentally sound elimination of obsolete pesticides stockpiles in Iraq;
  - capacity building workshop<sup>7</sup> for the project development and fund mobilization on the disposal of PCBs<sup>8</sup> contaminated equipment; and
  - technical consultation workshop and training on sound management of chemicals and wastes was conducted with a focus on the Globally Harmonized System for Classification and Labeling for Chemicals (GHS)<sup>9</sup>.
- As a result of the training activities, two new project proposals were developed<sup>10</sup>. In addition, a *Concept Note on Performance Management System for Chemicals Management* was drafted that guides institutions and individuals to meet their chemicals management goals via continuous improvement.

## Criterion 1.3: Existence and level of development of chemical/waste management unit or department

### RAITING



### SPECIFIC RESULTS:

At project start, a department of chemicals management already existed. It had been established in 2009 and consisted of five branches<sup>11</sup> covering core chemicals management areas. The department of chemicals management was in charge of the implementation of the MEAs. For this, it had to coordinate its work with other agencies and stakeholders under very rigid procedures defined in the policies and strategies.

The project assessed these internal procedures and adapted them to better meet the obligations under the MEAs. As a result, **a separate unit was established for each MEA under the existing five branches**. In addition, a unit for the Stockholm Convention was established in 2018 when Iraq joined this convention.

## Criterion 1.4: Level of development of multi-stakeholder coordination mechanism for chemical/waste management

### RAITING



- |  |   |
|--|---|
| <p><b>0</b> There was no multi-stakeholder coordination mechanism</p> <p><b>1</b> There was a multi-stakeholder coordination mechanism with very limited and irregular participation from Government and non-Government bodies</p> <p><b>2</b> There was a multi-stakeholder coordination mechanism with more regular and structured participation from Government and non-Government bodies</p> | <p><b>3</b> There was a multi-stakeholder coordination mechanism with regular meetings and adequate participation from Government and non-Government bodies</p> <p><b>4</b> There was coordinated planning and a common knowledge exchange mechanism in addition to a multi-stakeholder coordination mechanism with regular meetings and adequate participation from Government and non-Government</p> <p><b>5</b> The multi-stakeholder coordination mechanism reached full maturity with full participation from all Governmental and non-Governmental stakeholders and a joint community of practice</p> |
|--|---|

### SPECIFIC RESULTS:

The project strengthened intersectoral coordination by involving key ministries and agencies. It **created four intersectoral committees** which meet regularly to discuss and take action on issues related to integrated & sound management of chemicals and waste.

- Higher Committee for the Synergy of the Chemical Agreements (BRS, Minamata & SAICM) provides information and data on chemical agreements; gives guidance on the management of hazardous waste; makes recommendations on critical issues of SAICM (particularly high-risk pesticides and inhibitors of endocrine and nanomaterials); and contributes to the preparation of national strategies.
- Legislative Committee reviews laws and regulations related to the management of chemicals. It was established 28 November 2017.
- Committee to unify the chemical related law and develop plan implements the national chemical policies. It was created in 2021 by Diwani Order number 42.
- A Ministerial Committee for the development of the environmental security strategy was created in 2021.

## Criterion 2.1: Level of development and implementation of chemical/waste management policy, plan or strategy

### RAITING



- |   |  |
|---|--|
| <p><b>0</b> There was no strategy, policy or plan</p> <p><b>1</b> The strategy, policy or plan was proposed</p> | <p><b>2</b> The strategy, policy or plan was adopted</p> <p><b>3</b> The strategy, policy or plan was in place and being implemented</p> |
|---|--|

### SPECIFIC RESULTS:

The project supported the **development of two strategies**. One is being implemented and the other is at the approval stage.

- **The National Chemical Security Strategy** addresses the security situation in the high-risk chemicals sector including physical, electronic and human elements protection. It takes into account the international effort in the management, control and direction of dangerous chemicals to be safer and more effective. It started being implemented after its approval 25 November 2018.
- **The Strategy for Combatting Pollution in Iraq (2021)**<sup>12</sup> tackles pollution in Iraq in an integrated manner. It addresses different priority areas of pollution in Iraq and was developed based on an evaluation of situation in the country. It is currently at the approval stage.

## Criterion 2.2: Level of development of legal framework/primary legislation

### RAITING



- |  |   |
|--|---|
| <b>0</b> Nothing was done  | <b>2</b> The integration of the MEAs into national legislation was adopted        |
| <b>1</b> The relevant authority proposed to integrate the MEAs into national legislation | <b>3</b> The MEAs were integrated into national legislation and being implemented |

### SPECIFIC RESULTS:

The project addressed institutional and legal the gaps to strengthen the sound management of chemicals. Many reforms have been proposed. Among others,

- **The Law for the ratification of the Minamata Convention** was developed and passed in December 2020. As a result, Iraq ratified the Minamata Convention in September 2021.
- A **National Chemical Profile** was developed, which provides an overview of the chemical management system in Iraq.
- The Ministry of Environment became a separate entity from the Ministry of Health in 2020, in order to better lead the environmental related management.

## Criterion 2.3: Level of development of regulatory framework/secondary legislation

### RAITING



- |   |  |
|---|--|
| <b>0</b> Nothing was done                                       | <b>2</b> The regulations were adopted                        |
| <b>1</b> The relevant authority proposed to develop regulations | <b>3</b> The regulations were in place and being implemented |

### SPECIFIC RESULTS:

**Several secondary laws and regulations have been proposed and some adopted.**

Legal orders passed in 2021:

- Diwani Order (Number 42) to form a committee to unify the laws related to chemicals management and put forward a strategy to implement the national chemical policies.
- Diwani Order approving the Proposal for achieving chemical security and control over chemical contaminants and other chemical supplies.

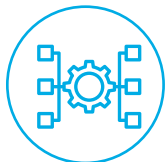
Legal orders still at proposal stage:

- Proposal for instruction to arrange the chemicals stores and the environmental license.
- Proposal for the prohibition and phase out of Asbestos in Iraq.

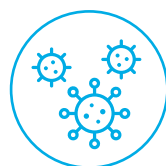
# FACTORS AFFECTING PERFORMANCE



**Gender:** About 45% of the participants in the project activities were women. In addition, gender concerns were addressed in the training and awareness raising materials and a specific chapter focusing on women was included in the National Chemical Profile.



**Institutional structure:** The project was affected by institutional changes. The implementation partner of the project - the Ministry of Environment - was merged in 2015 with the Ministry of Health. In 2020, both Ministries were separated again. As a result, the fund transfers and the overall project implementation became more complicated.

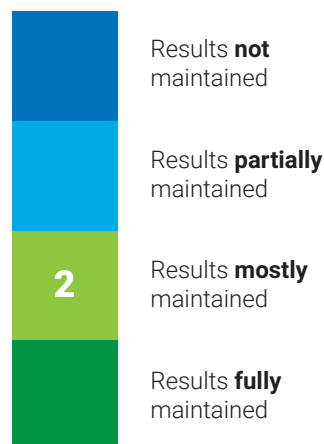


**COVID-19:** The project was substantially impacted by COVID. Many of its activities such as training activities had to be cancelled during the pandemic. As a result, the project needed an extension of 30 months, but all activities were completed.

## SUSTAINABILITY

- The project **results have been mostly sustained.** The capacity building activities have enabled the government to independently continue with the sound management of chemicals. For this, the government is providing funding to maintain staff salaries, scientific research, and the equipment/laboratories. The Ministry of Environment and the Department of Chemicals Management continue their work and are able to maintain the results, among others by addressing the obligations under the Stockholm Convention to eliminate PCBs and POPs.
- However, two items are pending execution i) the policy proposals, and ii) the concept notes which should be developed as individual projects addressing specific areas of chemicals and waste management.
- Finally, Iraq has been successful in attracting international funding to further support the work on chemicals and waste<sup>13</sup>.

### RAITING After the End of the Project



## LESSONS LEARNED

A Project Coordination Unit was established in the Ministry of Environment at project start. This helped the organizing and implementing the project as the roles and responsibilities of the entities and the experts were defined from the beginning.

The direct contact with international experts was important to transfer the desired expertise and knowledge to Iraq.

The project was implemented in parallel with NIP/MIA<sup>14</sup> projects related to the Stockholm Convention on POPs and Minamata Convention on mercury. This helped to have synergy, use the technical and financial resources efficiently and to maximize the impact of the project outputs.

- <sup>1</sup> The previous registry was under the power of the Environmental Protection and Improvement Act No. 27 of 2009. It served as the database and chemical control platform. It was set up under the assumption that by controlling the import of chemicals, all the chemicals in the country would be controlled. - Ref. "Concept note and design of a national chemical registry for Iraq".
- <sup>2</sup> GHS: Globally Harmonized System of Classification and Labeling of Chemicals
- <sup>3</sup> Material Safety Data Sheet
- <sup>4</sup> "Individual enhancement of capacities for chemicals and waste management" and "Training needs and assessment Plan for Iraq".
- <sup>5</sup> on 6 September 2021 for the training and on 7 November 2021 for the review, which provided theoretical information (Classification of Chemicals and Hazard Communication, Notification and Registration Systems for Chemicals, Chemical Risk Assessment and Restriction/Ban of Chemicals) on how to prepare a chemical register system with different examples from different countries; participants are technical staff from line ministries and national agencies who are involved in the sound management of chemicals.
- <sup>6</sup> on 7 October 2021 for 29 participants from environment, health, agriculture sectors.
- <sup>7</sup> on 8 September 2021 for 18 participants from relevant ministries and national agencies.
- <sup>8</sup> polychlorinated biphenyls
- <sup>9</sup> 4 day training workshop (17-20 June, 2019) for 5 different training sessions (Mercury, PCBs; UPOPs; Pesticides; GHS) for about 60 Iraqi participants from various sectors and Ministries from Iraq such Ministry of Health and environment, Oil, Agriculture, Interior, Industry and Minerals, Electricity and many more, it was conducted by 6 international trainers that are pioneers in their fields to deliver the necessary material.
- <sup>10</sup> Project proposals: 1) Taxonomy Elimination of POPs and Pesticides in Iraq - for the elimination of obsolete pesticide stockpiles in Iraq, and 2) Elimination of PCBs in Iraq-GEF - for environmentally sound disposal of PCBs in Iraq.
- <sup>11</sup> Branches: chemicals management, hazardous waste management, contaminated sites assessment, oil pollution, and environmental carcinogens.
- <sup>12</sup> Ref. Project Final Report Annex A2.1: Laws, Regulations and Institutional Structure for Integrated Chemicals Management, Republic of Iraq, December 2021
- <sup>13</sup> Such as the "Integrated Persistent Organic Pollutants (PoPs) Management Project" financed by the GEF <https://www.thegef.org/projects-operations/projects/10972> and executed by the World Bank: <https://projects.worldbank.org/en/projects-operations/project-detail/P178935>.
- <sup>14</sup> MIA - The Minamata Initial Assessment (MIA) Development for the Minamata Convention (2021): funded by GEF (Global Environment Facility) in 2017. An inventory on the mercury sources in Iraq was developed in 2021.
- NIP - The National Implementation Plan (NIP) Development for the Stockholm Convention, funded by GEF in 2017. Three Persistent Organic Pollutants (POPs) inventories were developed as well as the NIP report.