

KAZAKHSTAN

Project: Strengthening the national capacity of the Republic of Kazakhstan to regulate chemicals through ensuring compliance with obligations under international Multilateral Environmental Agreements

Second Independent Assessment of the Closed Projects under the Special Programme Report (December 2024)

RESULTS

Overall Assessment

The project made progress across multiple Core Indicator Criteria, preparing the National Profile on Chemicals Management, strengthening Kazakhstan's regulatory framework for chemical and waste management, and enhancing expertise and awareness. However, delays in adopting the Road Map for the Chemical Industry (2021–2025) and the absence of formalized inter-agency coordination mechanisms highlight areas requiring further action to ensure the project's long-term impact.

Implementing partner:
UNDP

Agreement timeframe:
24 Sep 2019 – 31 Dec 2021

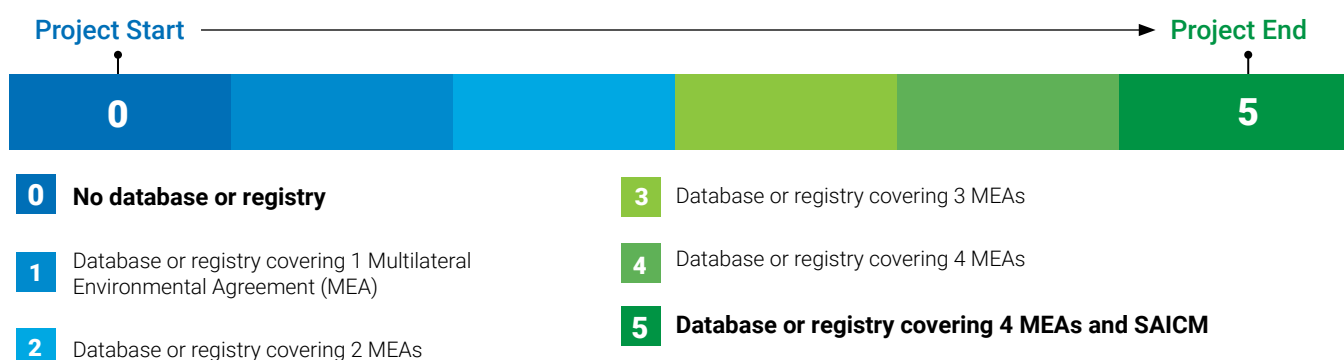
Budget: 249,631 USD

Results & progress by Core Indicator Criteria

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

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

RATING



SPECIFIC RESULTS:

The project developed the [National Profile on Chemicals Management in the Republic of Kazakhstan](#)¹, which systematically assessed Kazakhstan's existing infrastructure and practices for chemicals management to enhance its alignment with international standards and improve overall safety. It collected and analyzed comprehensive data on the production, import, and export of chemicals, including statistics on volumes and types. The study examined how chemicals are used across various sectors, storage and transportation practices, and the methods employed for waste management, such as recycling and disposal. Critical issues were identified at every stage of the chemical lifecycle, from production to disposal, alongside an evaluation of the health and environmental impacts of chemical exposure. Additionally, the project reviewed Kazakhstan's legislative and regulatory frameworks, focusing on laws, enforcement mechanisms, and strategies for monitoring and controlling chemical substances. Institutional responsibilities and stakeholder engagement were also significant components of the analysis. The roles and coordination mechanisms of government agencies were assessed, as were the contributions of non-governmental organizations (NGOs), industry representatives, and civil society in achieving sound chemicals management. Furthermore, The National Profile not only identified gaps and challenges but also proposed targeted recommendations for improving chemical safety practices, enhancing intersectoral collaboration, and building capacity across relevant institutions.

Criterion 1.2: Level of necessary for chemical/waste management expertise

RATING



- | | |
|--|---|
| <p>0 No knowledge or expertise available</p> <p>1 Not enough personnel in at least one priority Ministry, Department or Agency have basic training in chemical and/or waste management</p> <p>2 Enough personnel in at least one priority Ministry, Department or Agency have basic training in Chemical and/or waste management</p> | <p>3 Enough personnel from 1 or 2 Ministry, Department or Agency have been trained in chemical and /or waste management and know how to apply it into country planning</p> <p>4 Enough personnel in 3 or 4 Ministries, Departments or Agencies have been trained in chemical and/or waste management and can transfer their knowledge to colleagues for day-to-day use</p> <p>5 All the required personnel have necessary expertise and can integrate chemical management into the development planning process</p> |
|--|---|

SPECIFIC RESULTS:

- Capacity building under the project involved a range of activities to strengthen chemical and waste management expertise in Kazakhstan. Training sessions, including an international online workshop attended by 173 participants, focused on applying international and national chemical safety regulations, with particular emphasis on the Eurasian Economic Union's (EAEU) Technical Regulations (TR EAEU 041/2017²). Roundtables and seminars provided platforms for discussing draft frameworks such as the National Profile on chemical management, engaging government representatives, industrial stakeholders, NGOs, and academia to identify gaps and share best practices. According to the project's final report more than 1000 individuals were reached through eight different capacity building events.
- In addition, for sharing publications and raising public awareness about chemical safety issues, the project utilized the websites and social networks of three different agencies: UNDP, the Center for Sustainable Development (CSD), and JSC "Zhasyl Damu", a subordinate organization of the Ministry of Ecology, Geology, and Natural Resources.. Over 30 publications were shared, alongside Kazakhstan's first chemical safety podcast featuring six episodes on topics such as POPs, pesticides, and plastics³. All these materials remain accessible online, ensuring ongoing public education on chemical safety.

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

RATING



- | | |
|---|---|
| <p>0 Nothing had been done</p> <p>1 The Government decided on a mandate to establish a unit</p> <p>2 The Government developed a framework document detailing how the unit would be established and would operate</p> | <p>3 The unit was established and had an executive director</p> <p>4 The unit was established and had an executive director. In addition, standard operating procedures were developed, and staff were hired</p> <p>5 The unit had all human, financial and physical resources and was fully operational</p> |
|---|---|

SPECIFIC RESULTS:

The project created the preconditions for strengthening the institutional framework for relevant MEAs' implementation by developing the draft regulation on the establishment of Chemicals Agency³ under MADRE. By the time of this assessment the regulation was not adopted due to the government changes. It is believed that the establishment of the agency will help with the national coordination of chemicals management and will provide a single interface for importers/exporters, manufacturers, government agencies and other stakeholders for the activities related to chemicals management.

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

RATING



0 There was no multi-stakeholder coordination mechanism

1 There was a multi-stakeholder coordination mechanism with very limited and irregular participation from Government and non-Government bodies

2 There was a multi-stakeholder coordination mechanism with more regular and structured participation from Government and non-Government bodies

3 There was a multi-stakeholder coordination mechanism with regular meetings and adequate participation from Government and non-Government bodies

4 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 bodies

5 The multi-stakeholder coordination mechanism reached full maturity with full participation from all Governmental and non-Governmental stakeholders and a joint community of practice

SPECIFIC RESULTS:

- A project-led analysis identified a gap in Kazakhstan's coordination of chemical and waste management, and proposed creating an interagency coordination commission to improve collaboration, establish clear roles, and facilitate effective communication among stakeholders. However, the establishment of the commission was delayed due to the postponed enforcement of the Eurasian Economic Union Technical Regulation TR EAEU 041/2017, which entered into force by the end of 2022.
- Although the commission itself was not established, intersectoral collaboration was achieved during the project through the creation of a Working Group. This group, which was integrated with the Project Board, included representatives from key ministries and served dual roles in facilitating technical discussions, providing expert input, and ensuring effective decision-making and coordination of project activities. Through this approach, the project laid the foundation for the potential establishment of an interagency coordination commission by fostering dialogue and preparing recommendations to guide its creation.

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

RATING



0 There was no strategy, policy or plan

1 The strategy, policy or plan was proposed

2 The strategy, policy or plan was adopted

3 The strategy, policy or plan was in place and being implemented

SPECIFIC RESULTS:

The project facilitated the preparation of the Road Map for the Development of the Chemical Industry (2021–2025) through a highly consultative processes and with the involvement of all the relevant stakeholders. The Road Map stands out for its structured approach, clearly identifying sources of financing, timeframes for implementation, and responsible entities for each initiative. However, with the project ending, it has not been formally approved.

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

RATING



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

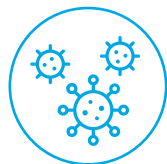
SPECIFIC RESULTS:

The project contributed to advancing the regulatory framework for chemical and waste management in Kazakhstan. It facilitated the inclusion of mercury in the list of pollutants whose emissions are subject to environmental regulation and the list of substances requiring mandatory environmental monitoring. Furthermore, in response to a request from the Ministry of Ecology, Geology, and Natural Resources, the project developed several regulatory acts, including the "Rules for handling persistent organic pollutants (POPs) and wastes containing them," which were approved by the Minister in November 2022. This regulation establishes procedures for managing, monitoring, and mitigating the risks associated with POPs in compliance with international conventions such as the Stockholm Convention. Other regulations, such as the "Rules for making an inventory of stationary emission sources" and the "Rules for keeping records of hazardous waste," were proposed to enhance regulatory oversight and environmental accountability. However, the approval of these regulations is still pending.

FACTORS AFFECTING PERFORMANCE



Gender: The project demonstrated gender responsiveness by integrating gender considerations into its activities. Among the participants in capacity-building initiatives, such as round tables, seminars, and workshops, women played significant roles. Gender aspects were systematically addressed in legislative reviews, capacity-building initiatives, and the establishment of institutional frameworks. For example, recommendations included analyzing the gender equality situation and enhancing the participation of women in decision-making processes related to chemicals management. Furthermore, public awareness campaigns and materials on chemical safety explicitly targeted women's needs, focusing on their specific exposure risks.



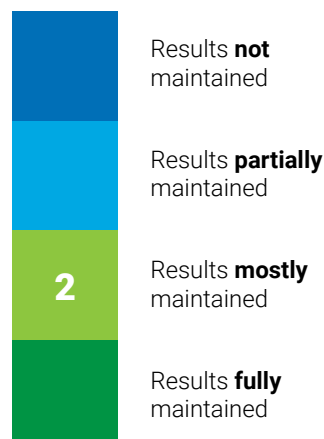
COVID-19: The pandemic necessitated adjustments to the planned activities. For example, certain stakeholder engagements, workshops, and consultations that were intended to be conducted in person had to be moved to online platforms. Despite these challenges, the project adapted by utilizing virtual tools.

SUSTAINABILITY

The project results are **mostly maintained** due to the following:

- Results are mostly maintained, with two regulations approved, stakeholders having access to the national profile and many project-produced awareness materials, and the majority of trained staff remaining in their positions. However, the sustainability of the project's outcomes was challenged by the absence of mechanisms to ensure long-term follow-up and implementation.

RATING After the End of the Project



LESSONS LEARNED

External factors can prevent the realization of key project outcomes. The postponed enforcement of the Eurasian Economic Union Technical Regulation TR EAEU 041/2017 hindered the establishment of an interagency coordination commission. While the project adapted by engaging an inter-agency working group, the collaboration lacked the intensity achievable through a formalized structure.

Combining the roles of the Working Group and Project Board into a single structure can sometimes provide a practical solution to resource and coordination constraints during the project. While the arrangement worked in this instance, such an integration can be challenging in balancing technical expertise with strategic oversight.

Stakeholders often agree on recommendations or action plans, but follow-up is hindered by workload pressures. While stakeholders participate in the discussions and the development of recommendations, the absence of legally binding commitments frequently results in limited follow-up once they return to their overburdened workplaces after the project concludes. Allowing sufficient time within the project timeline or implementing a follow-up initiative to secure formal government approval and incorporate specific tasks into institutional responsibilities, can help ensure the sustained implementation of recommendations.

Leveraging international and national expertise enhances capacity for chemicals management. The involvement of international expertise in the analysis, capacity building and recommendations development, combined with the active participation of national experts, has been essential in advancing Kazakhstan's efforts to manage chemicals and waste effectively. International consultants integrated global best practices through expert analysis and tailored recommendations, accelerating the alignment of national frameworks with international conventions. National experts played an important role in contextualizing these insights, and their collaboration with international counterparts not only ensured relevance to local conditions but also enhanced their own expertise.

¹ The very first page of the document incorrectly lists the funding agency of the project as GEF instead of UNEP SP https://kap.kz/custom/wysiwyg/image/file/20201130/20201130124826_15372.pdf.

² The EAEU Technical Regulation 041/2017, "On the Safety of Chemical Products," standardizes safety requirements for chemicals within the Eurasian Economic Union. It ensures proper classification, labelling, registration, and risk assessment, promoting trade while safeguarding health and the environment.

³ Link to the podcasts: <https://undp.mave.digital/>. Link to one of the knowledge products on the CSD website: <https://csd-center.kz/baza-znaniy/vliyaniehimicheskikh-veschestv-na-zdorove-i-okruzhayushchuyu-sredu.html?lang=ru>. Note: The link to the Zhasyl Damu website may be unsafe: <http://zhasyldamu.kz/proekt-proon-menuru/proekt-proon-unepru.html>.