

# National Implementation Plan under the Stockholm Convention on POPs for Sri Lanka





#### THE PERSISTENT ORGANIC POLLUTANTS (POPS) PROJECT

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# MESSAGE FROM THE HON MINISTER OF ENVIRONMENT

In keeping with the Government's commitment to improve global environmental improvement through addressing national priorities, the preparation of the National Implementation Plan (NIP) for the Stockholm Convention on Persistent Organic Pollutants (POPs) can be considered a major milestone in our efforts towards improved environmental management in the country. Out of the twelve pollutants designated for international action under the Convention, Sri Lanka has already taken steps to ban eight of them long before the Convention came into force. Recognising the persistent nature of these chemicals and potential health hazards to human beings, Sri Lanka is committed to cooperate with the regional and international community in finding ways to control and eliminate these pollutants completely. This further confirms our commitments for the implementation of the Rio Declaration and the Johannesburg Declaration on Sustainable Development, through adoption of sustainable production and consumption patterns.

The NIP identifies the actions that Sri Lanka has to take in order to fulfil our obligations and responsibilities towards successful implementation of the Convention. The inventories of the three groups of POPs chemicals which were compiled through the NIP preparation process provide a good insight into the scope and scale of the situation in the country. The awareness creation and public education programmes conducted in the country for identifying the possible sources of these pollutants and the impacts of POPs and the steps that could be taken to control them effectively would be helpful in the implementation of the plan with adequate public participation.

I wish to thank GEF/UNEP for their financial assistance and guidance provided in the preparation of the NIP and congratulate my Ministry staff and all others who were involved, for their relentless efforts in preparing the NIP within the timeframe stipulated by the Convention. I would also like to assure the international community that our government will continue to take further measures to fully comply with our commitments under the Stockholm Convention.

Hon. Maithripala Sirisena Minister of Environment

# MESSAGE FROM THE HON DEPUTY MINISTER OF ENVIRONMENT

It gives me great pleasure to send this message on the completion of the National Implementation Plan (NIP) for the Stockholm Convention on Persistent Organic Pollutants (POPs).

The twelve pollutants identified for global action under the convention are known to have properties highly detrimental to human and animal life and it is necessary that timely action is taken to eliminate them globally through local actions. The NIP has addressed the major issues of concern and presents the action plans and resource requirements required for its successful implementation.

It is noted that the release of unintentionally produced POPs in uncontrolled thermal processes and open burning of waste have to be reduced and restricted. A good awareness programme for stakeholders and the general public would be very useful in soliciting their cooperation in the successful implementation of the NIP. It requires national level inputs with public-private partnerships followed by regional and international cooperation especially in the area of environmentally sound transfer of technology.

Finally I would like to offer my grateful thanks to all government and non government institutions, and individuals that contributed to the preparation of the NIP.

Pandu Bandaranaike Deputy Minister of Environment.

# **PREFACE**

The preparation of the National Implementation Plan (NIP) is the result of a series of activities including compilation of preliminary inventories on POPs Pesticides, Polychlorinated Biphenyls (PCBs) and the Unintentionally Produced Dioxins and Furans undertaken by this Ministry. Capacity building and Institutional Strengthening programmes, Awareness Raising and Information Dissemination together with a national data collection exercise comprised the balance components of the programme. The preliminary inventories have already been published.

The NIP details several activities to control and manage POPs in Sri Lanka. Capacity Building and Institutional Strengthening as well as Awareness raising on the detrimental effects of POPs are areas of high priority for the successful implementation of the NIP. Currently, Sri Lanka does not use any of the POPs pesticides, identified by the Stockholm Convention. The NIP has identified a few of the POPs for priority action. Polychlorinated Biphenyls (PCBs) in transformers need high resource utilization and development of expertise in management, control and elimination. In the case of restriction and control of unintentionally produced POPs such as Dioxins & Furans, PCBs and Hexachlorobenzene, the introduction of Best Available Technology & Environmental Practices (BAT/BEP), use of Cleaner Production Techniques in industry and awareness programmes would be necessary. A substantial amount of external inputs in expertise, technology transfer, use of external testing and treatment facilities are envisaged. It is also necessary to improve waste management practices locally by creating awareness on the detrimental impacts arising out of uncontrolled dumping and burning of waste.

The NIP was prepared with inputs from key stakeholders and the general public. The cooperation of other ministries, government agencies and private sector institutions would be necessary for the successful implementation of NIP. We look forward to their support and encouragement in this endeavour and hope to generate mutual strengthening of expertise and capacity of Sri Lanka in the different sectors relating to industry and environment.

The generous support and advice extended to us by GEF/UNEP in this national endeavour is greatly appreciated.

J.R.W. Dissanayake Secretary Ministry of Environment.

#### **FOREWORD**

The National Implementation Plan (NIP) for the Stockholm Convention is the product of a concerted team effort with valuable contributions from many institutions, groups and individuals.

The project for the preparation of the NIP was implemented in collaboration with the United Nations Development Program (UNEP), with funding from the Global Environmental Facility (GEF).

The project activities followed a phased process set out in the GEF guidelines for actions under the Stockholm Convention viz. Determination of coordinating mechanisms and organization of process; Assessment and enhancement of national infrastructure and capacity and the establishment of POPs inventory; Setting up of priorities and determination of objectives; Formulation of a National Implementation Plan (NIP) and Specific Action Plans; and Endorsement of NIP by Stakeholders.

A Project Control Unit was established with a National Project Coordinator to coordinate the activities of the project. This unit was supported by a Technical Advisory Panel to provide technical guidance as and when necessary.

Six Task Teams were established in respect of POPs Management; POPs Monitoring; Socio Economic Aspects of POPs; POPs Pesticides; PCBs and PCB containing equipment; and Unintended by-products and industrial chemicals. Task Team members were selected from relevant stakeholder institutions. It is expected that this mechanism would in turn ensure continuation of the project activities after completion of the initial project. There were three mentors who provided guidance to the task teams in preparation of the inventories. All the Task Teams were assisted by International Consultants and the inventories and the NIP were subjected to a review by UNEP.

Stakeholder workshops were conducted during all stages of the project with high-level participation of representatives from various governmental, non governmental and private sector institutions. Many awareness programs at national, provincial and local authority level were also conducted to raise awareness on POPs and the country situation on POPs. Several media programs were also developed and telecast in this endeavour. An information system and a website were also developed during the project period to disseminate information and secure the cooperation of stakeholders and interested parties in developing the NIP and also in its implementation.

The NIP contains time bound action plans and resource requirements based on the recommendations of the task teams and on the comments of the stakeholder institutions and interested parties.

The Ministry of Environment expresses its sincere gratitude to all those who contributed at various levels to develop this document which would help Sri Lanka to implement the Stockholm Convention and facilitate the national and international community to reduce and eliminate the health and environmental impacts arising from POPs. The technical and financial assistance provided by UNEP/GEF is gratefully acknowledged.

L P Batuwitage Project Director/Director Environment Ministry of Environment

# **ACKNOWLEDGEMENTS**

The preparation of this National Implementation Plan (NIP) was a national effort involving many Ministries, Government Departments and Agencies, the Private Sector, non-governmental organizations (NGOs) and the general public. Inputs from a host of them, including individuals have been used to prepare the NIP. The NIP preparation process spanned across the tenure of three Ministers of Environment, Hon. Rukman Senanayake, Hon. A.H.M. Fowzie and our current Minister Hon. Maithripala Sirisena. It is with deep gratitude that we place on record the unstinted support provided by them in the functioning of the Project Implementation Unit and its activities leading to the successful completion of the NIP. Valuable assistance and guidance were provided by former Secretaries of the Ministry of Environment- Mr. Thosapala Hewage, Mr. D. Dissanayake, Mr. P. M. Leelaratne and our current Secretary, Mr. J. R. W. Dissanayake to whom we offer our grateful appreciation. Special thanks are also due to Mr. W. R. M. S. Wickremasinghe, Additional Secretary, who has been assisting the project team from the very inception in various ways and providing advice and guidance as well as reviewing project reports and publications. The services rendered by Mr. Anura Jayathilake of the Ministry of Environment during the project inception is also acknowledged.

The Global Environment Facility (GEF) through the United Nations Environmental Programme (UNEP) provided the bulk of the funding for this project without which the project may not have materialized. We offer our grateful thanks to them. In the provision of managerial expertise and advise on NIP preparation, particular mention should be made of the Task Managers for Enabling Activities at UNEP Ms. Fatoumata Ouane and Dr. David Piper who advised and guided the Project Director and National Project Coordinator in project implementation. Dr. Piper has been especially helpful in the review and advice on the completion of the three inventories and this NIP. The former National Project Coordinator (NPC) Dr. Rupa Wickremaratne, assisted by Mr. Lal Induruwage and Mr. Champika Somatileka, former Project Assistants and Ms. Menaka Dilrukshi former office assistant, have done a lot of work in the initial stages of the preparation of the NIP while Mr. Desmond de Silva, Financial Assistant, Ms. Dilani Sooriyarachchi, Project Assistant Mr. Lalith Perera, former Information Technology Assistant and Mrs. U.D.G.S. Uggala have been a great resource in assisting me in my duties. Ms. L.P. Batuwitage, the Project Director from the inception, has been a source of expertise and inspiration and she guided us well and offered her assistance to complete the NIP. Our thanks are due to all of them. The valuable cooperation provided by key institutions such as the Ceylon Electricity Board (CEB), Lanka Electricity Company Ltd (LECO) and Lanka Transformers Ltd (LTL), Office of the Registrar of Pesticides, Central Environmental Authority, Industrial Technology Institute (ITI), Tea Research Institute, Customs Department, Ministries of Health, Industries, Science and Technology, National Planning and the Department of Imports and Exports is acknowledged with gratitude. They provided a great deal of expertise and data and also released some of their key staff to function as Task Team Members in NIP preparation. Dr. A.M. Mubarak, Director, ITI, Dr. G. Manuweera, Registrar of Pesticides and Ms. L.P.Batuwitage functioned as Mentors for the Task Teams and offered their expert advise. Dr. Neville Goonewardena, Deputy Director General of Customs and Mr. K.D.G.Bandaratileka Deputy Director General of CEA are the other members of the Technical Advisory Panel who provided guidance and advice to the PCU as well. Mr. R. H. R. Lokubalasuriya, Deputy General Manager, Ceylon Electricity Board has been particularly helpful with technical advice. Final technical review of this NIP was done by Prof. Ajith de Alwis of the University of Moratuwa, who provided valuable comments. The National Coordinating Committee (NCC) has met regularly and reviewed progress of the project activities and outputs; we wish to thank the NCC members for their patience and valuable inputs towards the preparation of the NIP. Finally, we wish to record our appreciation for assistance provided by numerous other ministries, departments, institutions and individuals who have assisted us in various ways in ensuring that the project activities could be successfully completed.

S.A.M.Azmy National Project Coordinator

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Annex I: Communications and Reporting

Annex II: Socio Economics issues on POPs Management

# LIST OF ACCRONYMS AND ABBREVIATIONS

°C Degrees Celsius

2,4,5-T 2,4,5-Trichlorophenoxyacetic acid

a Year (annum), 365 days ADt Air-dried ton (of pulp)

APC(S) Air pollution control (system)

BAT Best available techniques/technologies

BHC Benzenehexachloride

BOI Board of Investment of Sri Lanka

Chlorination bleaching stage using molecular

C chlorine dispersed dissolved in water (pulp and paper

production)

CAS Chemical Abstract Service
CEA Central Environmental Authority

CEB Ceylon Electricity Board
CFR Case Fatality Rate

CMC Colombo Municipal Council

CNP 2,4,6-Trichlorophenyl-4'-nitrophenyl ether

COP Control of Pesticides

CRI Coconut Research Institute

CTC Ceylon Tobacco Company Limited
CTMP Chemo-thermo-mechanical pulp

Chlorine dioxide bleaching stage using a water solution of chlorine dioxide (CIO2) (pulp and paper

production)

d.m. Dry matter

D

DDD Dichlorodiphenyldichloroethane
DDE Dichlorodiphenyldichloroethylene
DDT Dichlorodiphenyltrichloroethane
DDTs Total DDT and its Metabolites

DL Detection limit

E Extraction bleaching stage using sodium hydroxide

(NaOH)

ECF Elemental chlorine free (bleaching)
ECVM European Council of Vinyl Manufacturers

EDC 1,2-Dichloroethane

EPA Environmental Protection Agency
EPL Environmental Protection Licence

EPZ Export processing Zones
ESP Electrostatic precipitator

EU European Union

FTA Free Trade Agreement

g Grams

GC Gas Chromatography

GCMS Gas chromatography Mass spectroscopy

GDP Gross Domestic Product
GEF Global Environment Facility

Gen. Aux Generation Auxiliary Transformers
GSMB Geological Survey and Mines Bureau

GWh Giga watt hours

h Hour(s)

HCB Hexachlorobenzene
HCB. Hexa chloro benzene
HCE Hexa chloro ethylene
HDI Human Development Index
HEPZ Horana Export Processing Zone

HPLC High Performance Liquid Chromatography

HS Codes Harmonized System codes

HW Hazardous waste

IARC International Agency for Research on Cancer

IDB Industrial Development Board

IPHTR&DC Institute of Post Harvest Technology Research and

**Development Centre** 

IPM Integrated Pest Management
IPP Independent Power Producers

ISO International Standardization Organization
I-TEF International Toxicity Equivalency Factor

I-TEQ International Toxic Equivalent
ITI Institute of Industrial Technology
IVM Integrated Vector Management

K (Degree) Kelvin kg Kilograms

kPa Kilo Pascal (= one thousand Pascal)

kVA Kilo volt Ampere

I Liter

LOI

LECO Lanka Electricity Company (Pvt) Ltd

Loss on ignition (a measure for residual carbon

content)

LP Liquefied petroleum

LTL Lanka Transformers Limited

LW/TW Ratio between the total weight and the liquid weight ME&NR. Ministry of Environment and Natural Resources

ME Ministry of Environment

MEPZ Mirigama Export Processing Zone

Mg Magnesium

mg/l Milligrams per Litre
MRL Maximum Residue Limit
MSW Municipal solid waste
MVA Mega volt ampere

MW Megawatt

NA Not applicable (not a relevant release vector)

Na₂S Sodium sulfide NaOH Sodium hydroxide

National Aquatic Resources Research and NARA

**Development Agency** 

National Science and Technology Commission **NASTEC** National Council (of the Paper Industry) for Air and **NCASI** 

Steam Improvement, Inc.

NCC National Coordinating Committee NCS National Conservation Strategy

ND Not determined/no data /Not detected

**NEA** National Environmental Act. NEP National Environmental Policy

National Engineering Research and Development **NERDC** 

Centre

Nanogram ng

**NWPEA** 

О

NIP National Implementation Plan

Normalized (standard) cubic meter; the volume a gas Nm³

occupies at atmospheric pressure (1,013 mbar) and

273.15 K (0 °C)

Toxic equivalent using the Nordic scheme **NTEQ** 

(commonly used in the Scandinavian countries)[1] North Western Province Environmental Authority Oxygen bleaching stage (pulp and paper production)

PAH Poly aromatic hydrocarbon **PARCOM** Paris-Oslo Commission **PBB** Polybrominated Biphenyl **PCB** Polychlorinated Biphenyl **PCDD** Polychlorinated dibenzo dioxin **PCDF** Polychlorinated dibenzo furan

PCI Per Capita Income **PCP** Pentachlorophenol

PCP-Na Sodium pentachlorophenate **PCT** Polychlorinated tetraphenyl

**PeTAC** Pesticide Technical and Advisory Committee

PIC **Prior Informed Consent POPs** Persistent Organic Pollutants

ppm Parts per million Parts per billion ppb

PTS Persistent toxic substances

**PVC** Polyvinyl chloride

**RDA** Road Development Authority

**RDF** Refuse derived fuel **RSS** Ribbed smoked sheet

Strategic Approach for International Chemical SAICM

Management

Ton (metric)

TCF Totally chlorine free (bleaching)
TEF Toxicity Equivalency Factor

TEQ Toxic Equivalent

TRI Tea Research Institute

TW Total weight

UN/UNO United Nations Organization

UNEP United Nations Environment Programme

UV Ultra-violet

VCM Vinyl chloride monomer WHO World Health Organization

# EXECUTIVE SUMMARY

Sri Lanka became a signatory to the Stockholm Convention on Persistent Organic Pollutants (POPs) on 5<sup>th</sup> September, 2001 and ratified the Convention on 22<sup>nd</sup> December 2005.

In order to meet her obligations towards the Convention, the Government of Sri Lanka initiated activities to prepare the National Implementation Plan (NIP) for the control of Persistent Organic Pollutants (POPs) with the assistance of United Nations Environment Programme and Global Environmental Facility (UNEP/GEF). Twelve Persistent Organic Pollutants (POPs), due to their toxicity, persistence and other detrimental properties are designated for international action with a view to final elimination worldwide. Eight of these are pesticides, two are industrial chemicals and the other two are unintentionally produced chemicals. The Pesticides are; Aldrin, Chlordane, Dieldrin, Endrin, Heptachlor, Hexachlorobenzene (HCB), Mirex. Toxaphene and are no longer used in Sri Lanka. Two industrial chemicals; Polychlorinated Biphenyls (PCBs) and Hexachorobenzene (HCB) which is also a pesticide had extensive usage in Sri Lanka. The two unintentionally produced by products are Dioxins (Polychlorinated Dibenzo Dioxin - PCDD) and Furans (Polychlorinated Dibenzo Furan (PCDF).

The project for the formulation of the National Implementation Plan (NIP) was planned so as to generate an integrated and workable NIP, with the satisfactory execution of the following activities:

- 1. Establishment of a coordinating mechanism
- 2. Formulation of POPs inventories and assessment of infrastructure and capacities
- 3. Priority setting and determination of objectives
- 4. Formulation of the National Implementation Plan (NIP)
- 5. Endorsement of the NIP by the stakeholders

For the formulation of the NIP and determination of the baseline situation, it was necessary to compile preliminary inventories of POPs, which would help determine the scope of the POPs issue in Sri Lanka. For this purpose, six Task Teams were set up to contribute towards the NIP preparation out of which three teams were assigned to the formulation of 3 inventories namely POPs Pesticides, Polychlorinated biphenyls (PCBs) and unintentionally produced Dioxins and Furans. The other three teams were assigned with Tasks to evaluate the legislative framework, socioeconomic issues, country baseline situation, assess and generate data on POPs in the environment, institutional capacities on POPs monitoring etc. Since one of the major aims of the project was to build capacity of stakeholder institutions, all the Task Team members were selected from relevant stakeholder institutions in order to facilitate capacity building, which is a major objective of the project so that implementation activities could be conducted without major problems.

Sri Lanka has been fortunate that the detrimental effects of POPs have been noted long before the Stockholm Convention came into force and substantial measures have been taken even decades before the convention was signed by Sri Lanka and has never manufactured any of the POPs chemicals. For instance, while there is no history of use of Hexachlorobenzene and Mirex, Dichlorodiphenyltrichloroethane (DDT) has been banned from agricultural uses in 1970 and from all other uses such as for vector control by 1976. By 1996 Chlordane, the last of the POPs pesticides was banned from all uses in Sri Lanka. Even in the case of Polychlorinated Biphenyls (PCBs), in the 1990s, in some instances safety measures have been taken by storing used PCB oils in steel drums securely for safe disposal in the future.

Sri Lanka is also a party to the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their Disposal and is obliged to find environmentally sound solutions for all POPs chemicals as wastes. Similarly, Sri Lanka has ratified The Rotterdam Convention on the Prior Informed

Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade which became international law and thus legally binding on its members today.

#### POPs PESTICIDES

The currently recommended pesticides are less toxic and less persistent than the earlier pesticides. The stocks of outdated POP pesticides are negligible and hence disposal is not a serious issue but larger stocks of out-dated non-organochloro pesticides need immediate attention. Although DDT was prohibited from use in agriculture in 1970 and from public health in 1976, traces of DDT and its derivatives have been detected in some environmental compartments and this needs further investigation. There is limited information available on the residues of these chemicals in groundwater and surface water bodies, which are found in large numbers in agriculture areas. Awareness on POP pesticide related issues, concerns and required remedial measures are alarmingly poor among most of the sectors in the society. Replacement of all POP pesticides with other chemical alternatives in agriculture, public health vector control, industrial uses such as wood preservation and termite control have been successfully implemented in Sri Lanka.

#### Problems related to POPs Pesticides

- Possibility of illegal imports through false declarations
- Lack of resources for systematic screening of imports
- Environmental impacts and baseline levels not adequately studied
- Lack of sufficient resources for identification and analysis
- Inadequate Health impact data
- Stocks of outdated Non-POPs pesticides still to be disposed.

# Management Actions Identified

- 1. Improvement of pesticide regulatory system to adequately address the specific issues
- 2. Mechanism to minimise accumulation and safe disposal of outdated pesticides, at all levels
- 3. Development and implementation of proper information gathering and dissemination system
- 4. Develop Laboratories and analytical capacity
- Monitoring and surveillance of environmental and human health effects

#### Polychlorinated Biphenyls (PCBs)

PCB is an industrial chemical which was used extensively all over the world. Transformers used in Sri Lanka have been imported from over twenty countries and cover many models produced for Generation, Transmission and Distribution. PCB was used extensively as a dielectric in transformers until international production ceased in 1986. Of the estimated 18,500 transformers in the electricity and industrial sector, a very few pure PCB transformers have been identified. Initially it was assumed that only transformers manufactured before 1986 had high probability of containing PCB. However, sampling across different era of manufacture using field test kits and laboratory analysis indicates that there is a very high degree of cross contamination of even non-PCB transformers during routine maintenance even among relatively new transformers. Thus, on subsequent random sampling of "Non PCB" transformers, a several PCB contaminated transformers (within the range of 50-2000 ppm PCB) have been identified. The contamination is assumed to have taken place during maintenance activities or the in adverted use of PCB contaminated oil.

For elimination of PCB several alternatives are currently available. Three test burning experiments have been conducted for PCB destruction of transformer oils at a Cement Kiln in Sri Lanka and this could be a positive development in PCB management.

#### Problems related to PCBs

- Lack of adequate legislation to control imports
- Environmental impacts and baseline levels not adequately studied
- Lack of sufficient resources for identification and analysis
- Lack of acceptable treatment, disposal and storage systems for PCB contaminated oils and equipment.
- Contaminated sites yet to be identified.
- Cross Contamination of non PCB oil with PCB oil

### Management Actions Identified

- 1. Develop new legislation for management and prevention of new entry to the country
- 2. Establish full inventory of PCB containing equipment
- 3. Establish procedures for equipment maintenance
- 4. Establish appropriate laboratory facilities for PCB analysis.
- 5. Establish and implement guidelines for phase out, transportation, storage and disposal of PCB containing equipment
- 6. Establish progress monitoring mechanisms

- 7. Capacity building for control and management of PCBs
- 8. Disposal of existing stocks and stockpiles
- 9. Rehabilitation and decontamination of contaminated sites
- 10. Introducing control measures to prevent cross contamination.

#### **Unintentionally Produced POPs**

The estimates of Unintended POPs produced in Sri Lanka were made using a toolkit developed by UNEP. The main sources of releases of PCDD and PCDF (Dioxins and Furans) in Sri Lanka were identified as:

- The uncontrolled combustion of wastes, primarily in dumps and in the open;
- The processing of metals, in particular scrap copper where a significant amount of PCDD/F is likely to be associated with the residues from gas cleaning systems;
- The incineration of medical wastes which is largely carried out under very poorly controlled conditions;
- Burning of biomass in homes for cooking, industry and for disposal of agricultural residues

Estimates of releases to air and residues were far greater than for releases to water, land or in products. This reflects both the nature of the main sources (thermal processes giving air emissions and residues from gas cleaning and combustion) and a lack of data to estimate releases to other media.

#### Problems related to unintentionally produced by products

- Lack of information to enable an estimate of releases associated with certain industries burning wastes, in particular textile off cuts and other waste.
- Lack of data on several categories of accidental fires.
- Lack of appropriate emission factors for some sectors. Of particular significance would be the lack of data on releases to water, for example associated with textile and leather industries.
- Lack of emission factors that relate to the burning of wastes and biomass is noted and further testing will greatly increase confidence in the estimated emissions.
- Significant uncertainty in relation to the amounts of waste that are ultimately burned in dumps and landfills, the fate of medical waste and the quantities of biomass that are used in the country.
- Uncertainty over the appropriate emission factors for the metal processes, biomass combustion and related to textile and leather processing in addition to the burning of wastes in dumps and in the open.

#### Management Actions Identified

- 1. Incorporate BAT/BEP requirement into legislation for new sources
- 2. Review & upgrade relevant legislation/s on solid waste management
- 3. Implement proper solid waste management/disposal mechanism
- 4. Implement proper medical wastes disposal techniques
- 5. Review existing technology on secondary metal recycling plants, including traditional industries, and identify necessary changes for upgrading these systems
- 6. Review existing crematoria designs for their acceptance and identify changes
- 7. Research and Development.

#### Resource Availability and Requirements for management of POPs

During the NIP preparation process a substantial amount of Capacity Building was done in terms of training of Task Teams to generate the inputs required for this NIP. Awareness raising among stakeholders was conducted through workshops, distributed printed materials and through electronic media such as Radio, TV and CDs. Institutional strengthening and further building of expertise have been included in the action plans of this NIP. While local expertise was available for identifying the scale of the POPs Pesticide issues, external expertise through foreign consultants was used for PCBs and Dioxins & Furans in the process of NIP development. In addition, managerial expertise was provided by UNEP throughout the project implementation.

There is a lacuna in expertise for NIP implementation in the area of technical expertise and Technology Transfer. While some expertise may be available in the country, access to same may be limited due to various reasons and therefore, enhancement of local expertise on POPs management is highly recommended. Human Resources Development in this area may not be difficult as adequate human resources are currently available in the country with basic engineering and technical skills. A good framework for the control of chemical import and use, especially for pesticides is in place and many of the unsafe pesticides have thus been banned or prohibited from import completely. This has been possible due to the availability of the expertise to handle the issue of certain pesticides effectively. In the need for external inputs for capacity building, particular mention can be made under the following:

i) Application of Cleaner Production Technology

A Cleaner Production (CP) Centre functions in Sri Lanka under the Ministry of Industrial Development as the host institution. A National Policy and Strategy for CP was also formulated in 2005 by the Ministry of Environment in collaboration with the CP Centre and other stakeholders. However multi disciplinary approaches and. additional expertise in Industry Specific CP techniques would be essential for the implementation of the NIP.

ii) Decontamination of Contaminated Sites

Decontamination has hardly been done in the country.

- iii) Management of Stockpiles
- iv) POPs treatment techniques, especially for PCBs
- v) Effective control of generation of Unintended POPs.
- vi) Fate and Effects Modelling
- vii) Application of Best Available Technologies and Environmental Practices (BAT/BEP)
- viii) Sampling and Analysis of POPs

The expertise available in the above fields in Sri Lanka has been confined to certain institutions such as the Universities, National Engineering Research Centre (NERD), Industrial Technology Institute (ITI), Office of the Registrar of Pesticides (RoP) etc. However such expertise may not be specific to POPs, hence there is a need for external expertise, on specific POPs issues.

Based on the analysis of the country baseline situation and the provisions of the Stockholm Convention along with other relevant international treaties, action plans were developed under six (6) broad categories viz; Action Plan 1: Institutional and Regulatory Strengthening Measure, Action Plan 2: Management of POPs Pesticides, Action Plan 3: Management of PCB and Equipment Containing PCBs, Action Plan 4: Management of Unintentionally Produced POPs by-products, Action Plan 5: Monitoring, Action Plan 6: Public Awareness Information Dissemination and Training.

Management options/activities were identified under each of these categories under which detailed activities were developed.

The action plans in this NIP stipulates specialised needs for specific activities under each prioritised issue. Costing for same has been indicated considering requirements of Local and Foreign expertise, Equipment, disposal and treatment facilities. Human, Capital and Operational Costs have been quantified and mentioned separately in this NIP. The Costs in US Dollars for the different activities over a three, six and over six year periods are as follows:

TABLE OF COST ESTIMATES FOR IMPLEMENTATION OF ACTION PLANS

Period	Estimated Costs in US \$				
T chou	Pesticides	PCBs	Unintended Releases	Monitoring	Management
Short Term (Three Years) 2007-2009	1,583,320	1,591,150	1,402,100	917,400	1,407,400
Medium Term (Six Years) (Continuation of short term activities also included Upto year 2012)	2,407,100	1,979,800	7,005,300	805,600	7,194,500
Long Term (Continuation of Medium Term Activities also included up to 2016)	291,100	845,200	177,604	511,200	211,204
Total Estimated up to 2016	4,281,520	4,416,150	8,585,004	2,234,200	8,813,104

#### TABLE OF TOTAL COSTS FOR SHORT, MEDIUM AND LONG TERM ACTIVITIES

Period	Estimated Costs in US \$
Short Term (Three Years) 2007-2009	6,901,370
Medium Term (Six Years) Continuation of short term activities included up to year 2012	19,392,300
Long Term – Continuation of Medium Term Activities included up to 2016	2,036,307
Total Estimated up to 2016	28,329,977

Hence for the three year period from 2007 to 2009 approximately US \$ 7.0 Million is required for short term activities, while a six year term from 2007 to 2012 would require an additional US \$ 19.4 million including continuation of short term activities, and a further continuation and additional activities up to the year 2016 would require a further US \$ 2,036,307. Thus a total of US \$ 28.329 million is estimated to be needed up to the year 2016 for all activities related to management and control of POPs in Sri Lanka scheduled to commence in 2007.

While a high input of local funds may be available, through the annual budgets of the Ministry of Environment and other Ministries and government agencies, the major funding has to be secured from external sources. It is estimated that approximately 30 % of the funding estimates would be in-kind contributions of State resources such as the services of permanent staff, office space, equipment and services. The Government, as a party to the Stockholm Convention, has already allocated US\$ 130,000 to the Ministry of Environment directly for POPs implementation activities in 2007. This is in addition to the currently available resources of the Ministry such as infra structure, staff and equipment and excludes salaries of permanent staff and other resources at the Ministry of Environment, as well as at other Ministries and government agencies..

# Chapter

1

# 1.0 Introduction

Persistent Organic Pollutants (POPs) are organic compounds that resist photolytic, chemical and biological degradation. They are characterized by low water solubility and high lipid solubility, resulting in bioaccumulation in fatty issues. They are semi volatile which enables movement over long distances in the atmosphere before deposition occurs. These properties of unusual persistence and semi volatility coupled with other characteristics cited above have resulted in the presence of these compounds all over the world and even in regions where they have never been used. Humans can be exposed to POPs through diet, occupational accidents and the environment (including indoors). Exposure to POPs either to acute or chronic can be associated with wide range of adverse health effects including life threatening genetic dysfunctions. POPs includes 12 chemicals, referred to as the "dirty dozen" have been identified by for control and management with a view to final elimination under the Stockholm Convention.

Sri Lanka became a signatory to the Stockholm Convention on Persistent Organic Pollutants (POPs) on 5th September, 2001 and the Ministry of Environment was designated as the focal point for the Convention. In order to meet the obligations towards the Convention, the Ministry of Environment secured funding through the Global Environmental Facility (GEF) for the preparation of a national implementation plan (NIP) for the control of POPs. A National Project Director and a Coordinator were appointed and a Project Coordinating Unit (PCU) under the Ministry of Environment was established to coordinate and prepare the NIP. The project was executed in collaboration with relevant stakeholders. With the establishment of the PCU, a National Coordinating Committee (NCC) was constituted under the chairmanship of the Secretary, Ministry of Environment. The NCC comprised of representatives of regulatory, implementing and monitoring agencies including line ministries . Subsequently a Technical Advisory Panel (TAP) was also set up to facilitate the input of expertise in the development with a mandate to review and advise on technical issues. Sri Lanka is also a party to the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their Disposal and is obliged to find environmentally sound solutions for all POPs chemicals as wastes. Hence this project is also instrumental in implementing provisions under the Basel Convention as well. Sri Lanka became a party to the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade, in January 2006. POPs too are included as hazardous chemicals and pesticides under this Convention. Hence, the Basel Convention and Rotterdam Convention implementation activities will be highly conducive and complement many activities in NIP implementation. The twelve chemicals designated for international action by the Stockholm Convention are grouped into 3 categories viz;

# Pesticides

Aldrin

Chlordane

DDT

Dieldrin

Endrin

Heptachlor

Mirex

#### Toxaphene

Industrial Chemicals

Hexachlorobenzene (HCB) which is also used as a pesticide

Polychlorinated Biphenyls (PCBs)

Unintended by-products

Dioxins (Polychlorinated Dibenzodioxin-PCDD)

Furans (Polychlorinated Dibenzofuran-PCDF)

HCB and PCBs were used as pesticides in the past and they may be also be produced as unintended by-products of certain anthropogenic activities.

The main objective of the Stockholm Convention is the Precautionary Principle: Protecting human health and environment from Persistent Organic Pollutants.

Article 3 of the Convention states that: Parties shall: [Article 3, para. 1]

(a) "prohibit and/or take the legal and administrative measures necessary to

eliminate":

(i) production and use of chemicals in Annex A (Aldrin, Chlordane,

Dieldrin, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene,

Polychlorinated biphenyls (PCBs))

and

(ii) import and export of chemicals in Annex A

i.e., trade is restricted

(b) "restrict its production & use" of chemicals in Annex B (DDT)

For Annex C Chemicals (PCDD/PCDF, Hexachlorobenzene, PCBs)

Parties shall, at a minimum, take measures to address the following:

- Develop an action plan
- release reduction or source elimination
- substitute materials, products, processes
- For new and existing sources use best available techniques (BAT) and best environmental practices (BEP)

Under the provisions of the Stockholm Convention, Sri Lanka is required to completely phase out the use of PCB's by 2025 and dispose of any stocks of PCB in an environmentally safe manner by 2028.

Thus, the first priority was the development of the NIP and hence the project to develop the NIP was established.

The project was planned so as to generate an integrated and workable NIP, with the satisfactory execution of the following activities:

- 1. Establishment of a coordinating mechanism
- 2. Formulation of POPs inventories and assessment of infrastructure

and capacities

- 3. Priority setting and determination of objectives
- 4. Formulation of the National Implementation Plan (NIP)
- 5. Endorsement of the NIP by the stakeholders

For the formulation of the NIP, it was necessary to compile preliminary inventories of POPs, which would help determine the scope of the POPs issue in Sri Lanka. For this purpose, six Task Teams were set up to contribute towards the NIP formulation out of which 3 teams were assigned the formulation of 3 inventories —on pesticides, Polychlorinated biphenyls (PCBs) and on Dioxins and Furans. Since one of major aims of the project was to build capacity of stakeholder institutions, all the Task Team members were selected from relevant stakeholder institutions, in order to facilitate capacity building, which is a major objective of the project.

#### Task Teams and Subjects Assigned

Task Team 1 – POPs Management

Task Team 2 – POPs Monitoring

Task Team 3 - Socio-Economic Aspects of POPs

Task Team 4 – POPs Pesticides & Industrial Chemicals

Task Team 5 - PCBs

Task Team 6- Unintended POPs

The National Coordinating Committee (NCC) with representation from major stakeholders and a Technical Advisory Panel (TAP) comprising of local experts were established to assist the Task Teams as well as the PCU in developing the NIP. The outputs generated by these task teams helped to develop the NIP.

# 1.1 THE PRELIMINARY ASSESSMENT OF THE SITUATION IN SRI LANKA WITH RESPECT TO THE STOCKHOLM CONVENTION

# 1.1.1 POPs PESTICIDES, INCLUDING DDT FOR HEALTH CONTROL

At the present time all of the POPs pesticides including DDT, Aldrin, Dieldrin, Mirex, Hexachlorobenzene, Heptachlor, Endrin, Toxaphene are not registered for use in Sri Lanka. The prohibition of the use of POPs pesticides was initiated in the early seventies and the last of the POPs pesticides, Chlordane was banned from its last allowed use for termite control in building construction sites in 1996.

On the basis of the above mentioned regulatory action under the Control of Pesticides Act no 33 of 1980 it could be safely assumed that no legal importation of POPs pesticides are taking place into Sri Lanka. This does not necessarily mean however, that illegal importation is not taking place. It is still possible for an importer to import these banned POPs pesticides under a different HS code as chemicals and not classified as a pesticide. This issue will have to be looked into, in order to ensure that no more stocks of these pesticides are imported into the country for any purpose.

The other major issue regarding POPs pesticides, is the possibility of certain food items being imported which may contain residues of POPs chemicals, particularly if they are being imported from countries where POPs pesticides are still being used and sometimes even manufactured. Routine analysis of food items for pesticide residues is not being carried out in Sri Lanka at present

# 1.1.2 POLYCHLORINATED BI PHENYLS (PCB) USED IN TRANSFORMERS

The preliminary inventory in Sri Lanka shows that there are 17,528 transformers owned by the CEB and 2700 owned by LECO. In addition there are around 74 transformers owned by independent Power Producers. Out of the 681 transformers manufactured on or before 1986, 176 units were subjected to the Field Test. It was revealed that 60% of the samples were positive for PCB's. However GC results indicated that only 48% of the transformers which indicated positive results from the Test Field Kits could be confirmed as positive through Gas Chromatography It is clear that a more comprehensive survey has to be carried out in order to determine the exact number of transformers and capacitors which contain PCB. In addition to this other priority sectors such as electronic manufacturing plants, railroad systems, transformer repair facilities, heavy industry and residential and commercial buildings should be surveyed in order to complete the survey and make a complete inventory of the PCB stocks in Sri Lanka.

Although Sri Lanka has signed the Stockholm Convention and is therefore bound by the conditions in the convention, there is no domestic legislation which can prevent anyone from importing PCB or PCB containing equipment if they so wish. The highest priority therefore is to classify all of the POPs chemicals as banned substances for importation by including these items under regulation under the Imports and Exports Control Act as was done for Blue Asbestos. The Harmonised System (HS) codes have been developed to control PCBs and PCB containing equipment to facilitate development of regulations.

Under the provisions of the Stockholm Convention, Sri Lanka is required to completely phase out the use of PCB's and dispose of any stocks of PCB in an environmentally safe manner by 2028. In order to do this it is vital that more precise information is available regarding PCB containing equipment including transformers and capacitors. Once a comprehensive survey is carried out regarding the available stocks of PCB a management plan would be required to be drawn up on the gradual phase out and environmentally safe disposal of these chemicals.

# 1.1.3 UNINTENTIONAL RELEASES OF POPs CHEMICALS

With respect to the unintentional releases of POPs chemicals from the preliminary inventory of sources of Dioxins and Furans, it appears that open burning of household garbage is one of the biggest sources. It would be very difficult if not impossible to put a complete stop to the burning of household waste as it is such a widespread practice in the absence of a proper waste management system. What would be more feasible and cost effective would be to carry out public awareness programmes on the possible emissions of Dioxins and Furans arising from the burning of household waste and the possible adverse health impacts of this practice. In addition to this, the provision of facilities such as sanitary landfill sites for the disposal of municipal solid waste is a priority in order to reduce the amount of open burning of household waste.

As for the emissions arising from hospital waste incinerators, it is still possible for the Ministry of Environment through the Central Environment Authority (CEA) to intervene in this matter and ensure that if hospital waste incinerators are considered to be an absolute necessity, to install one or two centrally located

incinerators rather than install incinerators in all hospital premises individually. It would also be possible to advise the health Authorities to go in for technology such as Autoclaving rather than the installation of incinerators which are considered as a major source of Dioxins and Furans.

With respect to the other major source of Dioxins and Furans which is the metal recycling industry, it is strongly recommended that the Ministry of Environment through CEA intervene in this matter, and take it up with the Board of Investment in order not to attract investors of such metal recycling industries to Sri Lanka in future. In fact, a decision has already been taken by the Board of Investment not to allow any new metal recycling industries into the country.

Chapter

2

# 2.0 COUNTRY BASELINE

#### 2.1 COUNTRY PROFILE

#### 2.1.1 GEOGRAPHY AND POPULATION

# 2.1.1.1 Geography

The Democratic Socialist Republic of Sri Lanka is a tropical island lying close to the south-eastern part of the Indian subcontinent. Its location is between 50 54' and 90 52' North latitude and 790 39' and 810 83' East longitude. It has a land area (i.e. excluding inland waters) of 62,705 km<sup>2</sup>.

Topographically, three-quarters of the island consists of a broad low-land peneplain at an average elevation of 75m above mean sea level. South-centrally, the land rises steeply to form a central massif which goes up to an elevation of 2500 m. The mean annual temperature of the lowlands ranges from 27 °C in the wet lowlands to 30 °C in the dry northern and eastern regions, and there is little variation in the mean monthly temperature during the year. In the hill country, situated in the south-central part of the island, the temperature is appreciably lower than in the lowlands, with a drop of around one degree Celsius for every 150 m rise in elevation. The high altitude region (2000 m and over) occasionally experiences ground frost at night, but its area is very small compared to the rest of the country.

Geologically, much the greater part of the island (90 per cent) is made up of Precambrian crystalline rock. Miocene limestone is found in the Jaffna peninsula and offshore islands and extending down the northwest coast as far as Puttalam and down the eastern coast as far as Mullaitivu. A few square kilometers of Jurassic Sandstone deposits are found in Tabbowa on the western coast and at Andigama near Puttalam. Notably, the island lacks fossil fuel deposits, and even in its offshore territorial waters, no deposits have been discovered to date. The main mineral deposits found in the country are graphite, gemstones, apatite phosphate, limestone, clays and mineral sands.

Water is one of the country's most important natural resources. On an average the island as a whole receives an annual rainfall of 2000 mm. There is considerable variation, however, in the spatial and temporal distribution of the rainfall. In two-thirds of the country, covering the northern and eastern parts of the island, the average rainfall is around 1500 mm, but what is significant here is the seasonal nature of the rainfall, much of the precipitation occurring during four months of the year (October to January). Because of the occurrence of a prolonged dry spell during a good part of the year this area is referred to as the dry zone. The southwest of the country, including much of the hill country, receives an annual rainfall of 2500 mm and more. Although two peak periods of heavy rainfall can be recognized here, there are no regularly occurring dry months. This area is referred to as the wet zone.

The harnessing of the water resources of the country for agricultural development in the dry zone is an epic saga in the ancient history of Sri Lanka. Beginning around 500 BC and spanning a period of several centuries, Sri Lanka's rulers developed what is now referred to as a "hydraulic civilization" where water resources were harnessed for the sustenance and well-being of the people. Over a long period of time,

thousands of reservoirs and associated water distribution systems were built throughout the dry zone. After the 12th century, the irrigation systems went into decline. Many of the reservoirs have been restored in recent times to serve their original purpose.

With emphasis being placed, since the 1940s, on restoring the original reservoirs and building new ones, the development of domestic agriculture received a fresh impetus. The soils of the country are of different types. The most widespread is the type described as Reddish Brown Earths, the most common soil in the dry zone. They are moderately deep and well-drained. The agricultural potential of this type of soil is very high, and a wide range of tropical cereals, oil seeds and subsidiary food crops could be grown on them under rain-fed or irrigated conditions. With the use of nitrogen and phosphate, efficient weed control and correct tillage and management practices, sustained levels of high production could be obtained in areas with this type of soil. In undulating land, in the middle and lower aspects, Yellowish Brown Earths and Low Humic Gley Soils respectively occur. These soils, with their imperfect to poor drainage, are ideally suited for growing rice which is the staple food of the Sri Lankan people. With the expansion of rice cultivation throughout the island and the use of high yielding varieties there has been a sharp increase in the use of fertilizers, insecticides and weed killers.

The soils of wet zone in the southwest of the country are mostly lateritic in nature. These soils are acidic in reaction, and the organic matter content and nitrogen status are moderate, increasing with elevation. Phosphorus and potassium status is generally low.

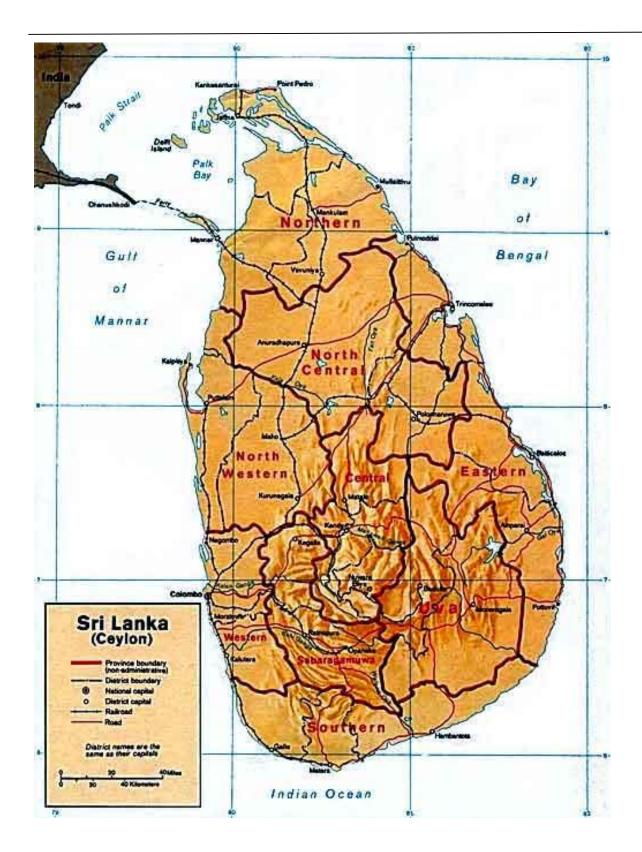


Figure 1: Map of Sri Lanka

Source: www.gov.lk

However, the soils have a good cat-ion exchange capacity and there is good retention of chemical fertilizers even under the high rainfall conditions in this region of the country. The depth, texture and drainage are generally good, and a high proportion of the soils are used for raising crop plantations (tea, rubber, and coconut), vegetables, spice crops, orchard crops, etc.

Natural forest was at one time the dominant vegetation over the island, accounting for around 70 per cent of the land area a century ago. With continued deforestation of the land to accommodate a variety of other uses, the forest cover has now reduced to 22 per cent.

Sri Lanka has a coastline of 1600 km. The Exclusive Economic Zone, extending to 200 nautical miles beyond the coast (except where the ocean is shared with India), covers an area of over six times the island's land area. The offshore and deep sea resources, including ocean bed minerals have yet to be assessed. The main coastal resources are fisheries and industrial sands (ilmenite, rutile, zircon and monazite).

### 2.1.1.2 Population

Sri Lanka's population now stands at 19.5 million, registering more than an eight-fold increase since the first scientific census carried out in 1871. During the early part of this period population growth was slow due to the high death rates, including maternal mortality. There was acceleration in population growth since the mid 1940s, reaching a peak of 2.8 per cent in the early 1960s. This was due to a dramatic decline in mortality without a corresponding drop in fertility. After 1963 the rate of growth declined as a result of a gradual decline in fertility and immigration. In 2004 the population growth was estimated to have declined to 1.1 per cent.

The distribution of population, the land area, and the population density by provinces is given below.

Table 1: The distribution of population, the land area, and the population density by provinces

Province	Population (provisional)	Land area	Density of Population
Western	5.526 million	3593 km <sup>2</sup>	1583
Central	2.506 "	5575 "	450
Southern	2.346 "	5383 "	436
Sabaragamuwa	1.840 "	4921 "	374
North-Western	2.214 "	7506 "	295
Eastern	1.540 "	9361 "	165
Uva	1.223 "	8335 "	147
Northern	1.122 "	8290 "	135
North-Central	1.145 "	9741 "	118
Total	19.462 "	62,705 "	310

Source: Department of Census & Statistics 2004

Within the country there are sharp differences in the population density as shown by the above statistics. The highest population densities are seen in the southwest coastal areas and the Central Province, with the administrative districts of Colombo, Gampaha, Kalutara, Galle, Matara and Kandy recording a density of over 500 persons per square kilometer.

The population comprises a mix of ethnic groups, of which the main ones are Sinhalese which form the majority (82 per cent of the population) and Tamils (9.4 per cent). These figures are based on the 2001 census, as more recent estimates are not available. The main religion is Buddhism (76.7 per cent of the population), with Hindus, Muslims and Christians comprising the balance.

The distribution of the population is also classified according to three sectors: Rural, Urban, and Estate. By far the highest proportion is rural (72.2 per cent). The urban and estate sectors account for 21.5 per cent and 6.3 per cent respectively.

Overall, urban migration has been slow to moderate. The process of urbanization being contained at this level can be attributed to the efforts made to develop the rural economy through the provision of schools, health centres, roads, electricity, etc. Although the urban-rural drift has on the whole been modest, in recent years there has been a considerable increase in the population in the south-western part of the country, in the areas surrounding the metropolis where there is a concentration of industries and where economic and social infrastructure is much better developed than in the rest of the country. In the Western province, which includes the metropolitan area, the proportion living in urban areas is nearly 47 per cent.

Since Sri Lanka gained independence in 1948 successive governments have placed considerable emphasis on education and health for the people. Systems of free education and free health services were introduced and continue to this day. As a result of these measures Sri Lanka has achieved a high literacy rate (for aged 5 years and above) of 92.5 per cent and a life expectancy at birth of 71.7 years for males and 76.4 years for females. As regards health, however, some indicators fall well short of desirable levels, and many of them are environment-related. The most notable among these is the incidence of communicable diseases – vector borne diseases, mainly malaria, filaria, Japanese encephalitis, dengue and dengue haemorrhagic fever and a range of bowel diseases.

## 2.1.2 POLITICAL AND ECONOMIC PROFILE

# 2.1.2.1 Economic growth

The economy of Sri Lanka is mainly agriculture based. It has two sectors namely, domestic and plantation sector. In management of pests, the plantation sector approach in a more organized manner whereas, in the domestic sector it is more complicated due to large number of farmers, crops and the pests involved. Agriculture is the biggest user of pesticides in Sri Lanka. The extents under different agricultural crops are Rice (6,85,625 ha), Fruit crops (99,727 ha), Other agricultural crops (1,31,220 ha), and Plantation crops (6,94,674 ha) (AgStat, 2004).

The year 1977 marked a watershed in the economic development of the country. In November of that year the government in power introduced sweeping economic reforms which included the liberalization of trade and relaxation of exchange controls and the adoption of an economic strategy dependent on private investment and market forces. The accompanying fiscal policy reforms relied on large scale support from international agencies, notably the IMF and the World Bank, and a host of donor countries. Prior to 1977, there were high levels of state ownership and state control in many sectors, and their performance was well below desirable levels.

The average annual rate of growth of the GDP from 1970 to 1977 had been 2.8 per cent, and this shot up to 8.2 per cent in 1978. This sharp increase was an immediate response to the new economic measures that were introduced and the growth was not expected to persist at that level. Between 1978 and 1984, the economy grew at an average annual rate of 5.9 per cent per annum. After 1984, one of the key factors that had a continuing adverse effect on the growth of the economy was the civil unrest in the north and east of the country demanding the establishment for a separate state. The growth rate of the economy fell to around 2.5 per cent in 1988-1989. In the following period there was a significant improvement in the growth rate and it fluctuated between 3.8 per cent and 6.9 per cent from 1990 to 1998.

In 2001 the Sri Lankan economy underwent a serious downturn, and the GDP recorded a negative growth rate of 1.4 per cent. This was brought about by several factors, both external and internal. Externally, there was the continuing decline in the world economy and the 11 September attack on key targets in the USA. In the local scene, a prolonged drought which had serious adverse effects on agriculture and power generation and the terrorist attack on the country's international airport with the accompanying loss of several aircrafts were the chief contributory factors.

With the cessation of hostilities in the armed conflict, the growth rate of the economy picked up in the first years of the new millennium. The growth of the GDP in 2004 was 5.4 per cent & in 2005 it was 6.0. Two important factors would no doubt have had an impact on the growth of the GDP in 2005; one was the tsunami disaster that struck the country on 26 December 2004 and caused extensive damage along more

than two-thirds of the island's coastline, and the other was the increase in oil prices which began in 2004 and reached historically high levels in 2005.

The investment/GDP ratio, which was 25 per cent in 2004 increased to 26.5 per cent in 2005. The domestic savings/GDP ratio was 15.9 per cent in 2004 increased to 17.2 in 2005. National savings, which include net factor income and net private current transfers from abroad, also from 21.6 per cent in 2004 to 23.3 per cent in 2005 of the GDP (Central Bank Report 2005). According to Central Bank, these levels of savings and investment are not adequate to raise growth and the living standards substantially, and a concerted effort must be made to raise savings and investment to at least 30 per cent of the GDP.

Sri Lanka's Human Development Index stood at 0.740, ranking 96th among 177 countries in 2002. The annual average inflation rate based on the Colombo Consumers' Price Index rose from 7.6 per cent in 2004 to 11.6 per cent in 2005. The Sri Lanka Consumers Price Index registered a 10.6 per cent increase in 2005.

#### 2.1.3 PROFILES OF ECONOMIC SECTORS

#### 2.1.3.1 Economic Sectors

The sectoral composition of the GDP in 2005 at constant (1996) prices is as follows.

Table 2: The sectoral composition of the GDP in 2005 at constant (1996) prices

Agriculture sector	17.2 per cent
Agriculture	14.2 per cent
Forestry	1.7 per cent
Fishing	1.3 per cent
Industry sector	27.0 per cent
Manufacturing	16.3 per cent
Construction	7.2 per cent
Mining & quarrying	1.9 per cent
Electricity and water	1.7 per cent
Services	55.8 per cent

Source: Central Bank Report 2005

# 2.1.3.1.1 Agriculture

Though no longer the dominant sector of the economy in terms of GDP, agriculture is of signal importance from the socio-economic point of view. Agriculture absorbs 34 per cent of the labour force, well ahead of industry. The agriculture sector (including forestry and fisheries), recovered from the setback in 2004 and registered a growth of 1.5 percent in value added terms in 2005. The record paddy harvest in both Maha and Yala seasons and a record production of tea were major contributors to this growth. Improved performance in other field crops and vegetables, rubber and other export agricultural crops also contributed to the recovery.

In terms of land use, the area sown in paddy amounted to 930,000 ha in 2005. Tea lands accounted for 222,000 ha, rubber 116.000 ha, and coconut around 395,000 ha. There are a number of other crops serving the domestic and/or export markets, such as cinnamon, coffee, cloves, pepper, cocoa, cardamom, maize,

chilli, onions and potatoes. The agricultural labour force is on average the more impoverished among the population.

### 2.1.3.1.2 Industry

With successive governments in recent years placing emphasis on industry as the "engine of growth" and the recognition of the private sector in driving the process, this sector has played an increasingly important role in promoting GDP growth. In 2005 the provisional growth rate of this sector was estimated at 8.3 per cent. The sector covers mining and quarrying, manufacturing, construction, electricity and water. The manufacturing sub-sector is dominated by factory industries which accounted for 59 per cent of the overall growth of the sector as a whole. The major contribution to the growth in factory industries in 2005 (over 90 per cent) arose from four of the nine major industrial categories, namely, textile, apparel and leather products; food, beverages and tobacco products; chemical, petroleum, rubber and plastic products; and non-metallic mineral products (mainly ceramics, processed diamonds, cement and roofing sheets).

## 2.1.3.1.3 Energy

The supply of energy in Sri Lanka is mainly based on three primary sources, namely, hydropower, biomass and petroleum. The relative proportions of these three forms of energy in the year 2005 were 8, 47 and 45 per cent respectively. Biomass fuel is used mainly for household cooking. Although the number of households using biomass fuel for cooking has been progressively decreasing, in 2004 it was estimated that as much as 82.8 per cent of households still used biomass fuel. It must be noted that, besides the three sources of energy mentioned above, other sources have traditionally been used to a considerable extent, but do not generally enter into reckoning when considering the energy balance of the country. These include the direct use of solar energy for drying agricultural and other products and the use of muscle power when draught animals are used for hauling goods.

Right up to the late 1980s, the generation of electricity was predominantly through the use of hydropower, with thermal generation mainly serving as a standby source. Since then, with much of the remaining potential sources of hydropower generation being used up and the demand for electricity increasing sharply, thermal generation had to be resorted to on an increasing scale. Between 2000 and 2005, the annual hydroelectricity generated in the island fluctuated around 3000 GWh, depending on the rainfall. Thermal generation went up from 3647 GWh in 2000 . Total Electricity generated in 2005 for supplying the national grid was 8769 GWh. 39.4% of this was generated from Hydro while 56.6% was from thermal sources. The installed capacities are 1291 MW of Hydro and 1115 MW of Thermal (Statistical Digest, CEB. 2005)

Successive governments, while recognizing the need to increase electricity supplies to sustain economic growth, have so far not been able to implement what would have been a major project for Sri Lanka intended to increase substantially the electricity supply through the use of coal. The plant was to have been set up in Norochcholai, near Puttalam, and was to use imported coal. Technical as well as social issues have been raised by the public objecting to the location of the plant at the proposed site, and up to now no firm decision seems to have been made whether or not to go ahead with the project.

Rural electrification by the expansion of the national grid into villages has received special attention by successive governments. On this scheme, even after the supply line is extended to reach a village many households remain unconnected as they cannot afford the cost involved in obtaining the connection and paying the monthly bills.

## 2.1.3.1.4 Transport

This sector has shown rapid growth in recent years. The registration of new vehicles grew from 82,401 in 1995 to 229,665 in 2005. In the individual categories, motor cycles, three wheelers and private cars showed the highest rates of increase. The other categories listed are buses, dual purpose vehicles, goods transport vehicles, land vehicles, and others. The growth trend is expected to continue. As regards fuel consumption by the transport sector, petrol has shown increases but diesel has shown decreases.. Petrol consumption

increased sharply from 224,000 tonnes in 2000 to 463,000 tonnes in 2005, thus doubling in five years. Diesel consumption decreased from 1,762,000 tonnes to 1,690,000 during the same period.

## 2.1.3.1.5 Health and Housing

Although Sri Lanka enjoys a remarkably high life expectancy for a developing country, it has a problem with regard to the control on vector borne diseases. This is basically an environment related problem. Urban expansion seen in recent decades was not pursued through a planned framework. The problems that emerged were urban sprawl and "ribbon development" along major roads, unplanned fragmentation of land, and use of low-lying areas and environmentally sensitive wetlands for industrial, commercial and residential purposes. Overcrowding and unhygienic living conditions are common in many towns. About half of Colombo's resident population lives in shanties and slums. As one of the strategies for controlling the spread of vector borne diseases the authorities are compelled to use insecticides on a regular basis.

Another matter of importance in the context of environmental pollution is the proper management of hazardous clinical waste, a matter that should receive the attention of the health authorities in collaboration with other concerned institutions.

### 2.1.3.1.6 Poverty and Unemployment

The per capita income which was 584 US \$ a decade ago has been increasing at a modest rate over the last 10 years and has just nudged the 1000 dollar mark, reaching 1188 \$ in 2005. There are wide disparities, however, in the distribution of wealth. A high proportion of the population lives in poverty. In 2005, a total of 2.0 million families, accounting to 42 per cent of the population, benefited directly from the income supplementary programme of the Samurdhi.. The population with an income of less than US \$ 1 per day was estimated at 6.6 per cent of the population and with less than US \$ 2 per day at 45.4 per cent (1995 data). Poverty in Sri Lanka is primarily a rural phenomenon; about 85 per cent of the poor households live in rural areas. The incidence of poverty is highest among casual labourers, small farmers, estate workers and rural women. The average income per household is lowest in the Uva Province.

Sri Lanka has a long tradition of providing income support and economic advancement assistance to the poor. Many different government agencies/programmes operate transfer schemes. Among them are the Department of Social Services, the Samurdhi programme, government-sponsored micro-credit programmes, regional economic advancement programmes, World Bank funded community driven development programmes, agricultural programmes providing subsidies and low-cost credit to landless poor and to resource poor farmers, and organizations providing relief and rehabilitation assistance to those displaced by the ethnic conflict in the north and northeast. The tsunami disaster of December 2004 rendered many hundreds of thousands of people homeless and deprived them of their sources of income. Rehabilitation of these people is a major task of the government, for which generous foreign assistance has been pledged.

There was a general decline in the rate of unemployment between 1990 and 2000, from 15.9 per cent to 7.6 per cent. From then on, however, there has been an increase in the percentage of unemployed, However the unemployment rate estimated by the Special Labour Force Survey declined to 7.7 per cent in August 2005 from 8.3 per cent in 2004. In absolute terms, the number unemployed increased from 517,000 to 684,000 between 2000 and 2004.

#### 2.1.4 ENVIRONMENTAL OVERVIEW

Sri Lanka's first National Environmental Action Plan was prepared in 1990 and came into effect in 1991, coinciding with the United Nations Conference on Environment and Development which was held in 1992. Since then, and up to 2001, there have been two more plans at three to four intervals, signifying the need to constantly update the needed action towards exercising environmental care in pursuing economic development. The current plan entitled: Caring for the Environment – Path to Sustainable Development (CFE) covers the period 2003-2007. It emphasizes that environmental care is the responsibility of every

development sector and institution and that the large majority of activities for safeguarding the environment have to be incorporated into, and form part of, any development project. Committees on Environmental Policy and Management, with membership of governmental and non governmental organizations in the appropriate sectors, review the progress of activities set out in CFE.

The Ministry of Environment in charge of the environment and the Central Environment Authority (Regulatory authority functioning under the Ministry of Environment) will no doubt play key roles in reviewing and catalyzing progress, giving the necessary guidance, and providing leadership in carrying out key functions that are cross sectoral in nature, while at the same time providing the necessary legislation and regulations and adopting control measures where needed.

Waste substances and articles containing or contaminated with PCB and/or PCTs and/or PBB are included as a waste stream (Waste Stream 23), in Schedule I of the regulation No. 1 of 1990, of the National Environmental Act, as amended by Gazette Extraordinary No. 595/16 of 1990. Under this regulation, no person shall collect, transport, store, recover, recycle or dispose waste containing or contaminated with PCBs or establish any site or facility for their disposal, except under the authority of a license issued by the CEA.

A Cleaner Production (CP) Centre functions in Sri Lanka under the Ministry of Industrial Development as the host institution. A National Policy and Strategy for CP was also formulated in 2005 by the Ministry of Environment in collaboration with the CP Centre and other stakeholders.

Under the National Environmental Act, standards have been proposed for inland water bodies. Proposed maximum acceptable levels of organic micro-pollutants in 'Inland surface waters where fisheries and aquatic life are to be protected' give a limit of 1 nanograms per litre of PCB (total) as the maximum acceptable level. However, the 'Proposed quality standards for different use classes of coastal water in Sri Lanka' proposes different values for different uses. (Table 3)

Table 3: Proposed quality standards on PCB for different use classes of coastal water in Sri Lanka

Parameter		Value for different use classes					
	Unit	Nature conservation	Fishery of shell fish	Fishery of fin fish	Non consumption use		
PCB (total)	μg/l	Natural condition	Smaller than 0.03	Smaller than 0.03	Smaller than 0.06		

Source: CEA, 2001

The Act No. 33 of 1980 on Control of Pesticides does not have provisions to control PCBs since this chemical is not used as a pesticide.

#### 2.1.5 CHEMICAL PROFILE

The National Chemical Profile has been prepared in the framework of the UNITAR/CEA project in 2002 (the original National Chemical Profile was prepared in 1997). It is addressing the issues on chemicals in general concerning chemical life cycle-importation manufacturing, storage, transportation, use and disposal of chemicals. Adequate attention has been focused on pesticides and chemicals in general. Sri Lanka became a party to the Rotterdam Convention in January 2006.

Following main areas have been discussed in general with regard to industrial chemical, Pesticides and Consumer/ Domestic chemicals.

- Chemical production, import, export and use.
- Priority concern related to chemical production, import, export and use.

- Legal instruments and non-regulatory mechanisms for monitoring chemicals.
- Ministries, agencies and other institutions managing chemicals.
- Relevant activities of industry, public interest groups and the research sector.
- Inter-ministerial commissions and coordinating mechanisms.
- Data access and use.
- Technical infrastructure.
- International linkages.
- Awareness/Understanding of workers and public.
- Resources available & needed for chemicals management.

#### 2.2 INSTITUTIONAL, POLICY AND REGULATORY FRAMEWORK

#### 2.2.1 INTRODUCTION

The Constitution of Sri Lanka makes it "The duty of every person in Sri Lanka to protect Nature and Conserve it's riches". The National Environmental Policy (2003) (NEP) acknowledges this duty and seeks to provide the direction according to which steps will be taken to conserve and manage Sri Lanka's environment in all it's aspects. Further, the NEP renews the commitment of the government, in partnership with the people, effectively to manage the environment for the benefit of present and future generations and has listed the outcomes expected and strategies to adopt for the key economic sectors in the policy document.

The National Environmental Policy recognises the importance of application of Cleaner Production and Life Cycle thinking in achieving sustainable development. Accordingly a Cleaner Production Policy has been developed and published in 2005 aiming at improving the productivity and economic sustainability of development activities while achieving environmental quality by taking preventive measures.

There is hardly any chemical manufacture taking place in Sri Lanka. As such almost all chemicals whether they be pesticides, pharmaceuticals or industrial chemicals are being imported into the country. In view of this situation, any scheme to control the import and use of chemicals would be most effectively implemented at the point of entry. Chemicals imported and used in Sri Lanka could be classified into several groups such as pesticides, fertilizers, pharmaceuticals and industrial chemicals. Out of these, the import and use of pesticides, pharmaceuticals and fertilizers are being controlled through separate legislative enactments.

## 2.2.2. ENVIRONMENTAL/SUSTAINABLE DEVELOPMENT POLICY AND GENERAL LEGISLATION

The Constitution of Sri Lanka (1978) recognizes both the responsibility of the State as well as the individual in Environmental Management and Protection by the following statements; "The state shall protect, preserve and improve the environment for the benefit of the community" and "It is the duty of every person in Sri Lanka to protect nature and conserve its riches". The pledge given in the 1978 constitution to safeguard the environment was formally institutionalised with the enactment of the National Environmental Act No. 47 of 1980. In 1990 a separate line Ministry was established by the government giving priority to the subject of environment.

Sri Lanka was also among the first few countries to recognize the objectives of the World Conservation Strategy (WCS) of 1980. An important recommendation of the WCS was that each country should prepare its own National Conservation Strategy (NCS) to guide the management and rational utilization of its natural resources in achieving the development objectives of the country. Work on the preparation of a NCS for Sri Lanka was initiated in 1982 and was completed in 1988. It identified priority areas and a strategy to deal with the problems of environmental degradation in Sri Lanka.

Strategic planning for environment commenced in the 1980s with the formulation of National Conservation Strategy (NCS). The original NCS has been regularly updated in the form of a National Environmental Action Plan (NEAP). The NEAP first published in 1991 covered the period 1992 – 1996 and the first update published in 1993 covered the period 1995 – 1998. The third update of the NEAP covered the period 1998 – 2001. A National Environmental Policy (2003) has been developed by the Ministry of Environment and many sectoral policies have been developed to integrate environmental concerns and to facilitate implementation of environmental policies in the journey of sustainable development. The recently developed Cleaner Production(CP) Policy and strategy make the approach of CP practices throughout the life cycle of products, production processes and services. Implementing this policy will facilitate meeting the objectives of the Stockholm Convention.

The first legislative Acts relating to the environment were passed by the British colonial government to assert authority and control over natural resources. The Crown Lands Encroachment Ordinance (1840) declared "all forests, waste, unoccupied and uncultivated lands shall be presumed to be the property of the Crown until the contrary thereof be provided". Subsequently a number of conservation and protection oriented Acts were passed to mitigate the environmental damage this Act encouraged such as the Forestry Ordinance (1907), Fauna and Flora Protection Ordinance (1937) and the Soil Conservation Act (1951).

Several other legislative Acts were introduced in the 1980s. The Coast Conservation Act was passed 1981 and amended in 1988. The National Heritage Wildness Area Act No. 3 of 1988 is cited as the national heritage Act. The National Environmental Act No. 47 of 1980 is the most comprehensive Act relating to environmental management and protection. This Act has been amended in 1988 and in 2000. From the late 1980s to the mid 1990s, several environments related Acts were revised to focus on a more participatory approach to environmental management. The revisions in 1995 to the Fisheries Act envisaged setting up of fishery management committees, the 1988 revision to the Irrigation Ordinance mandated farmer organizations, and the Forest Ordinance revision of 1988 contained provisions for participatory forestry.

#### 2.2.3 ROLES AND RESPONSIBILITIES

The roles and responsibilities of the main institutions involved in POPs life cycle is given below.

#### 2.2.3.1 Ministry of Environment

The Ministry of Environment, being the focal point for the Stockholm Convention is responsible for preparation of the NIP and solicits other relevant Government and non governmental institutions for the implementation. The National Coordinating Committee established by the ministry will coordinate and monitor as well as be responsible to update the NIP periodically based on the progress to fulfil the objectives of the Convention. The under mentioned institutions will have major roles in NIP implementation.

## 2.2.3.2 The Office of the Registrar of Pesticides

The Registrar of Pesticides is the Authority vested with the responsibility of controlling the importation, use and disposal of pesticides. The Registrar functions under the provisions contained in the Control of Pesticides Act No 30 of 1980, Control of Pesticides (Amendment) Act No. 6 of 1994. Under this Act, all pesticides are required to be registered with the Registrar of Pesticides prior to being sold in the market.

Prior to the registration of a pesticide a statement of the claim made by the manufacturer or producer of such pesticides as to its use, potency, stability in storage and the period of usage.

The Registrar of Pesticides as the licensing authority is entrusted with the responsibility of assuring the safety to the environment. The Registrar is advised on all matters relating to technical and policy aspects of the enforcement of the Act by a Technical Advisory Committee (PeTAC) appointed by the Minister of Agriculture under the provisions of the Act.

## 2.2.3.3 Customs Department

In Sri Lanka almost all chemicals used in the country are being imported. There is no manufacture of chemicals in the country, although some chemicals (mostly pesticides) are formulated using technical grade material. The Department of Customs plays an important role in the importation of chemicals into the country. At present, the first priority of Customs Department is to verify the authenticity of the chemicals being imported into the country with the main objective of collecting the required taxes. This is usually carried out based on the documents which accompany the cargo. The purpose for which each chemical is imported is not recorded under the current procedural requirements. Qualitative examination of chemicals is carried out only if there is reason to suspect irregularities.

### 2.2.3.4 Central Environmental Authority

The Central Environmental Authority is the National Level Government Agency vested with the responsibility of Environmental Management and Protection & functions under the provisions contained in the National Environmental Act no 47 of 1980 and its Amendment Acts no 56 of 1988. It is primarily a regulatory agency and the major regulatory functions of the agency are the implementation of the Environmental Impact Assessment (EIA) process for new, large scale development projects and the issuing of Environmental Protection Licences (EPL) for the control of waste discharges from industry.

The CEA does not directly control the import and use of chemicals by industry through regulatory measures. However, it does have a mandate to control waste discharges from industry which may contain chemicals. The CEA has already gazetted wastewater quality standards which are required to be met by industry when discharging their wastewater into the environment. These standards are concentration based standards which specify the maximum levels of polluting chemicals which may be discharged into the environment.

CEA has initiated activities to implement load based licensing system to promote industries to take preventive measures rather than concentrating on end of pipe treatment. Even though the CEA has no direct role at present to control the import or use of chemicals, it has presently identified a preliminary list of chemicals which are deemed to be hazardous to human health and / or the environment and require to be brought under some form of control through licensing. PCB's have also been included in this preliminary list of chemicals which are being proposed to be restricted and / or banned.

#### 2.2.3.5 Imports and Exports Control Department

The Imports and Exports Control Department functions under the provisions in the Import and Export Control Act No.1 of 1969 (last amended in 1987). The Act has introduced a "Special Import License Scheme (SIL) under which chemicals that come under the scheme cannot be imported without a license issued by the Controller of Imports and Exports. The license is issued on recommendations / certification given by the relevant regulatory Authority. (e.g. The Registrar of Pesticides in the case of chemicals classified as pesticides). On arrival of these chemicals to the country, clearance from the Imports and Export Control Department must be obtained before the Customs officials can release the goods to the importer. The Imports and Exports Control Act has provisions for further additions to the dangerous chemicals list by publishing regulations under the act on policy decisions made by the government.

#### 2.2.3.6 Board of Investment

The Board of Investment established under the provisions of the Board of Investment (BOI) Act No. 4 of 1978 as amended in 1992, is vested with the responsibility of bringing in foreign investment into the country. A BOI enterprise could import chemicals and equipment which are required for the operation of the particular industry. The list of such chemicals and equipment is required to be submitted to the appraisal Department of the BOI to obtain approval. This list is usually referred to the environment Department which in turn recommends to the Investor Services Department of the BOI clearance of the chemicals / equipment.

Under section 17 (1) of the BOI Act of 1978, The BOI has the power to grant exemptions from any law referred to in schedule B of the BOI Act or to modify or vary the application of any such law to enterprises in accordance with such regulations as may be made by the Minister. However, the Imports and Exports Control Act No. 1 of 1969 has not been included in schedule B of the BOI Act.

#### 2.2.4 RELEVANT INTERNATIONAL COMMITMENTS AND OBLIGATIONS

The National Environmental Policy (NEP) (2003) states "International Commitments will be honoured as part of our responsibility to the national and global communities. The national policies of Sri Lanka are in line with the objectives of the Basel Convention for the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and Sri Lanka become a party to the Basel Convention, in August 1992. The Ministry of Environment is the Focal point and the Central Environmental Authority is the Competent Authority for the implementation of this Convention.

The Ministry of Environment has established a National Co-coordinating Committee (NCC) to co-ordinate the implementation of the Basel Convention. The Secretary of the Ministry of Environment chairs NCC which includes representatives from various key institutions. Policy issues related to the implementation of various provisions of the Basel Convention and issues related to the hazardous waste management are considered at NCC meetings.

Although regulations for internal management of hazardous waste are in place to a considerable extent, implementation of these regulations is being delayed due to non availability of infrastructure facilities and support services for the disposal of these wastes. Sri Lanka also lacks sufficient facilities required to control transboundary movements of hazardous wastes. The country needs to strengthen its capacity for the identification and control of hazardous wastes coming into the country. Technical and financial assistance to build the capacity of the country in hazardous waste management are essential pre requisites for the effective implementation of the hazardous waste management plan.

Sri Lanka has taken steps to formulate legislation for the control of transboundary movements of hazardous waste under Import and Export Act. These will be gazetted shortly.

## 2.2.5 PRINCIPLES OF EXISTING LEGISLATION AND REGULATIONS ADDRESSING POPS

With regard to the legislation presently available in the country for the control of POP's chemicals, as far as the POP's pesticides are concerned there is adequate legislation in the form of the Control of Pesticides Act no 33 of 1980, for the control of the import, use and disposal of POP's chemicals classified as pesticides. At the present time, regulatory action under the provisions in the Pesticides Act no 33 of 1980 has resulted in the banning of all of the POP's Chemicals imported and used in Sri Lanka could be classified into several groups such as pesticides, fertilizers, pharmaceuticals and industrial chemicals. Out of these, the import and use of pesticides, pharmaceuticals and fertilizers are being controlled through separate legislative enactments.

With respect to the legislation required for the management of PCB and PCB containing equipment, new regulations are required in order to compel anyone having in their possession, PCB or PCB containing equipment to report the exact quantities they hold and how they plan to phase out the use of these chemicals by 2025 as required by the Stockholm Convention. Although draft legislation has already been developed under this project, there is still a need to discuss these regulations with the stakeholders

concerned, particularly with the Ceylon Electricity Board and Lanka Transformers Ltd (LTL) who own the majority of the PCB stocks as well PCB containing chemicals.

As far as the control of unintentionally produced POPs such as dioxins and furans are concerned, at the present time there is no legal requirements to control such emissions. It is only fairly recently that standards for the control of common air pollutants such as Sulphur Dioxide, Oxides of Nitrogen and particulate matter have been drafted. Even these standards are still in their draft form and have not been gazetted as air emission standards which are required to be met by industrialists. These standards are however being imposed on new industries which are being established and such industries are required to install the necessary equipment for pollution control. However Stack Emission Standards are due to be gazetted.. In the case of vehicle emissions, standards have been in force since 2003 by Gazette Notification for Diesel and Petrol vehicles and the standards are to be revised soon. Carbon monoxide, sulphur dioxide, particulate density hydrocarbon emissions etc. have been controlled under this act.

In view of the above situation it is difficult to imagine a situation whereby industries and/or other sources of unintentionally produced POPs would be required to meet stipulated standards. A more practical suggestion would be to recommend the adoption of Best Available Technology (BAT) and Best Environmental Practices (BEP) by such sources and control emission by effective temperature control in the processes.

There is hardly any chemical manufacturing taking place in Sri Lanka. As such almost all chemicals whether they be pesticides, pharmaceuticals or industrial chemicals are being imported into the country. In view of this situation, any scheme to control the import and use of chemicals would be most effectively implemented at the point of entry. As such, the Imports and Exports control Department and Customs Department would play a crucial role in chemicals management in view of the fact that these departments would play a crucial role in determining the types and quantities of chemicals which would enter the country. In addition to these two Departments the other government agencies which play a crucial role in chemical management are the Office of the Registrar of Pesticides, The Central Environmental Authority. The Registrar of Pesticides is the Authority vested with the responsibility of controlling the importation, use and disposal of pesticides. The Registrar functions under the provisions contained in the Control of Pesticides Act no 30 of 1980, and its amendment Act no 6 of 1994. similarly, The CEA has no direct role at present to control the import or use of chemicals, it has presently identified a preliminary list of chemicals which are deemed to be hazardous to human health and/or the environment and require to be brought under some form of control. PCBs have also been included in this preliminary list of chemicals which are being proposed to be restricted and/or banned.

## 2.2.6 ADEQUACY OF PRESENT LEGISLATIVE ACTS RELATING TO CHEMICALS MANAGEMENT WITH PARTICULAR REFERENCE TO POPS

There are several legislative enactments which specifically regulate the import, use and disposal of certain categories of chemicals in Sri Lanka.

# 2.2.6.1 The Control of Pesticides Act No 33 of 1980, and its Amendment Act No. 6 of 1994

The control of Pesticides Act No 33 of 1980, and its Amendment Act No 6 of 1994, aims at controlling the import, use, transport, storage and disposal of pesticides in the country. This Act contains adequate provisions in it for the control of the import and use of any pesticide. Under this Act, all pesticides which are being imported or used in the country are required to be registered, including its physical and chemical properties, toxicological data, amount of isomer impurities and other by- products, methods of analysis etc has to be submitted to the Registrar of Pesticides prior to registration.

Under this Act almost all of the POP pesticides have already been banned in Sri Lanka. Stockholm Convention Article 3; No. 1, 3 & 4 could be dealt under Control of Pesticides Act.

#### 2.2.6.2 Malathion Control Act No.22 of 1985

An Act to prohibit the possession, transport, sale and use of malathion in Sri Lanka by unauthorized personnel; Any hazardous pesticide can be dealt under this Act.

#### 2.2.6.3 Customs Ordinance

The Customs Ordinance which was last amended in 1988, is being implemented by the Customs Department. Under this Act, there is a gazetted list of restrictions, bans, enactments, laws and regulations already enacted, or to be enacted in the future by any agency/authority pertaining to imports and exports which are to be enforced, monitored or regulated by the Director General of Customs.

Since many of the POPs pesticides are already banned /not registered for use in Sri Lanka, it would be possible to take necessary actions against any violations in this regard. However, the situation regarding non pesticide POPs is different, as presently there are no restrictions in place.

### 2.2.6.4 Import and Export Control Act

The Imports and Exports Control Act, which was last amended in 1987, is an act to provide the control on importation of goods, for the regulation of standards of exportable goods and for matters connected therewith or incidental thereto. It is being implemented by the Department of Imports and Exports Control. Under this Act, a special import licence scheme has been introduced for selected chemicals. Chemicals which fall under this scheme such as fertilizer and pesticides cannot be imported into the country without a licence issued by the Controller of Imports and Exports. The licence is issued by the Controller of Imports and Exports based on the recommendations/ certification/ registration given by the relevant statutory authority for the respective chemicals.

Many restrictions can be introduced in the Management of POPs through Customs Law and Import & Export Law using the framework of it's existing provisions.

### 2.2.6.5 The National Environmental Act No 47 of 1980 and its Amendment

#### Act No 54 of 1988 (See chapter 2.2. 3)

The use and disposal of chemicals as well as the control of emissions arising from industrial processes is within the mandate of the CEA. As such, it is possible for the CEA to control the emissions of unintended POPs such as Dioxins and Furans through appropriate regulations, as and when required.

#### 2.2.6.6 National Environmental Act No. 53 of 2000

An Act to make provision for the Protection, Management and Enhancement of the Environment. Article 3.2 of the Stockholm Convention on import of chemicals in Annex A and B, can be dealt under the Hazardous.

Waste Regulations 924/13 gazetted under the powers of the NEA.

The details of the exact provisions within each of the above mentioned Legislative Acts is described in the background report .

When a gap study is done considering the POPs separately, the pesticides in common can be dealt within the Pesticides Act and the Industrial chemicals should be controlled by Customs Law and Import and Export Law. Hazardous Waste Regulations under the NEA also can be made useful in chemical management process.

## 2.2.7 PRIORITY PROBLEMS AND OBJECTIVES FOR INSTITUTIONAL AND REGULATORY STRENGTHENING

### 2.2.7.1 Objective

Develop and put in place legal and institutional tools for POPs management to achieve targets stipulated in the Stockholm Convention

## 2.2.7.2 Priority problems

## **Importation**

- Continued importation of POPs other than pesticides (PCB &HCB);
- Importation of active ingredients of pesticides as chemicals;
- Lack of monitoring facilities at the point of import for pesticides contaminated with POPs.
- Lack of analytical facilities with regulate authorities to monitor/validate submitted claims

### Regulatory Issues

- Absence of legislation for the control of chemicals and PCBs (Importation);
- Absence of legislation for management of PCBs /POPs within the country.
- Absence of legislation to control Dioxin and Furans emission

## Disposal and treatment

- No facility for treatment and disposal of POPs waste;
- Absence of a comprehensive plan with adequate funding for phasing out PCB and PCB contaminated material.
- No technological capacity to introduce BAT/BEP in processes.

#### 2.3 ASSESSMENT OF THE POPs ISSUE IN SRI LANKA

#### 2.3.1 POPs PESTICIDES (INCLUDING DDT FOR DISEASE VECTOR CONTROL)

#### 2.3.1.1 Introduction

The first synthetic pesticide to be used in Sri Lanka on a large scale was DDT, which was just after the World War II in the late 1940's. It was followed by benzenehexachloride (BHC) to control the malaria vector. Subsequently, with the successes achieved in vector control, these pesticides were used in agriculture for control of pests to meet the increasing demand for food after the War. By the next decade more toxic chemicals such as aldrin, dieldrin, endrin and others were also included in the arsenal of pesticides which were used indiscriminately for control of pests in the fields of agriculture, veterinary, public health, and the industry. All these chemicals were persistent, lasting in the environment for a very long time before breaking down and they are now categorized as Persistent Organic Pollutants (POPs) under the Stockholm Convention.

### 2.3.1.1.1 Relevant Stockholm Convention Requirements with regard to pesticides

Parties shall: [Article 3, para. 1]

- (a) "prohibit and/or take the legal and administrative measures necessary to eliminate":
  - (i) production and use of chemicals in Annex A<sup>1</sup> and
  - (ii) import and export of chemicals in Annex A
    - *i.e.*, trade is restricted [see paragraph (2)]
- (b) "restrict its production & use" of chemicals in Annex B<sup>2</sup>
  - "acceptable purposes" specified for these chemicals

Parties shall: [Article 6]

- develop and implement strategies to identify stockpiles [para. 1 (a)(i) and 1 (b)]
- manage stockpiles in a safe, efficient and environmentally sound manner (ESM) until they are deemed to be wastes [paragraph 1 (c)]
  - i.e., no remaining uses by Party
    - · no specific exemption or acceptable purpose

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- does not apply to stockpiles that may be exported
  - per Article 3, para. 2
- develop strategies to identify [para. 1 (a)(ii)]
  - products and articles in use, and
  - wastes

that consist of, contain or are contaminated with a POP in Annex A, B or C

- endeavor to develop strategies for identifying sites contaminated by POPs in Annex A, B or C<sup>3</sup> [para. 1 (e)], and
- if remediation is attempted, do it in an environmentally sound manner

#### Relevant Stockholm Convention Requirements with regard to DDT

Parties shall: [Article 3, para. 1]

- (b) "restrict its production & use" of chemicals in Annex B
  - "acceptable purposes" specified for these chemicals

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<sup>&</sup>lt;sup>1</sup> Aldrin, Chlordane, Dieldrin, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs)

<sup>&</sup>lt;sup>3</sup> PCDD/PCDF, hexachlorobenzene, PCBs

All Parties shall eliminate DDT production and use <u>except</u> Parties that notify the Secretariat of their intention to produce and/or use DDT in disease vector control programs (an "acceptable purpose" in Annex B):

These Parties will be included in a special publicly available DDT Register maintained by the Secretariat.

A Party may withdraw from the DDT Register at any time.

Production and/or use must be in accordance with WHO recommendations and guidelines on use of DDT, and only when locally safe, effective and affordable alternatives are not available to the Party.

#### 2.3.1.2 Situation in Sri Lanka

POPs pesticides were never manufactured in Sri Lanka but were imported as ready-to-use products or technical materials for local formulation. Only limited data is available on POPs as they were either banned, not used for the last fifteen years (e.g. endrin, heptachlor, toxaphene) or no history of their use at all in Sri Lanka (HCB and mirex). Recent detection of their residues in seabed (Colombo Harbour, ITI study) may be due to their persistence and excessive use in the distant past or due to long distance transport by water currents from the sites of their use. It may also have been due to sweepings of the ships and containers arriving at the harbour points. At the same time, though almost all these chemicals have been banned for use in domestic agriculture over a very long time, some of the chemicals had been allowed in to Sri Lanka in restricted quantities for use by trained personnel only in industry for control of termites in building sites and in plantation agriculture, which have also now been completely banned.

Pest management in Sri Lanka is mostly pesticide dependent and the annual imports of pesticides cost around 0.1% of Gross Domestic Production in 2002. Sri Lanka has successfully phased out number of hazardous pesticides including all the WHO hazard Class 1 pesticides and POP pesticides from usage. The currently recommended pesticides are less toxic and least persistent than the earlier pesticides. Safer alternatives are available for the spectrum of pests controlled by POP pesticides. The stocks of outdated POP pesticides are negligible and hence disposal is not a serious issue but larger stocks of out-dated non-organochroline pesticides, need immediate attention. Although DDT was prohibited from use in agriculture in 1971 and from public health in 1976, traces of DDT and its derivatives have been detected in some environmental compartments and this needs further investigation. There is limited information available on the residues of these chemicals in groundwater and surface water bodies, which are found in large numbers in agriculture areas. Awareness on POP pesticide related issues, concerns and required remedial measures are alarmingly poor among most of the sectors in the society.

As the regulatory authority responsible for proper management of pesticides in the country, Registrar of Pesticides has to depend on certification of product quality by the foreign manufacturer, but he is not adequately equipped to verify the claims. Cooperation received from the Customs Department in controlling illegal imports and pesticide industry in safe handling of pesticides, are very encouraging. However, certain improvements are needed in custom classification procedure to ensure prevention of possible imports through improper declarations. Incidences of pesticide related accidents are very high in Sri Lanka. On the other hand environmental damage due to pesticides has not been adequately studied.

Replacement of all POP pesticides with other chemical alternatives in agriculture, public health vector control, industrial uses such as wood preservation and termite control have been successfully implemented in Sri Lanka. For POP pesticides, the availability of safer alternatives has made them redundant in chemical pest control. In replacing the POP pesticides, the alternatives were recommended on the basis of pests, not on the basis of the chemical, and hence in certain cases there were more than one pesticide available to cover the spectrum of pests. Sri Lanka strongly advocates adoption of IPM technology to control pests, thereby, reducing the over dependence on pesticides. This in the long run helps to minimize pesticide-related hazards, in addition to ecological benefits.

Due to effective management of pesticides in Sri Lanka by the authorities through the implementation of International Guidelines, no serious problems are anticipated from storage of currently available pesticides. However, it is imperative that vigilance be maintained on possible "hot spots" in the environment, adverse health effects arising from exposure to contamination and to avoid any possible importation of candidate POP pesticides and illegal materials.

Table-4: Foreign exchange spent for import of Pesticides-2003

ltem	Volume in Metric Tonnes	Value in US \$ (x1000)
Insecticides	1684.4	7825.95
Weedicides	2925.1	8918.55
Fungicides	792.18	2775.76
Others (acaricides, rodenticides, fumigants, molluscicides, insect repellents, etc.)	19.55	74.79
Total	5120.73	19595.05

Source: Pesticide Statistics for the Year 2003, Office of the Registrar of Pesticides

Table 5: Status of prohibition and import of POP pesticides in Sri Lanka.

NAME OF PESTICIDE	Year of administrative declaration of	Last imports	
	prohibition/restriction of imports	Amount (kg)/year	Year
Aldrin	1986	7,040	1986
Chlordane	1996	4600	1994
DDT	1976	316,522	1976
Dieldrin	1992	1,100	1991
Endrin	1970	NA	-
Heptachlor	1986*	NA	-
Hexachlorobenzene	HCB has never been used as a pesticide in Sri Lanka.	None	-
Mirex	Mirex has never been used as a pesticide in Sri Lanka.	None	-
Toxaphene	1970+	NA	-

Source: Pesticide Statistics for the Year 2003, Office of the Registrar of Pesticides

NA- Not Available \* Year of restriction for termite control \* Year maximum expected in use

## 2.3.1.3 Priority problems and objectives for POPs management

Although some data are available concerning the concentration of limited number of pesticides in surface waters, river waters, etc. in Sri Lanka (BGS, 1992; Silva, et al., 1991) little or no information is available concerning the biological significance. Isolated incidences of pesticide related deaths of fish populations,

snakes, etc. have been reported in surface waters following heavy application of mostly organophosphate and carbamate type of pesticides in agricultural fields without possible long-term environmental damages. Also, scattered incidences are reported to the Office of the Registrar of Pesticides on deaths of peacocks and other birds due to the consumption of rice grains treated with insecticides.

The acute pesticide poisoning effects often resulted in mortality are easily noticeable from sub-lethal effects which require exposure to pesticides for a longer period of time. Though it is likely to be prevalent, long-term effects are either not diagnosed properly in some cases or difficult to establish the actual causative agent under the conditions prevailing in Sri Lanka. Since all POP pesticides are banned for more than a decade, any observable effects due to POP pesticides should have been associated with long-term sub lethal exposure from contaminated environmental compartments and food chains. Such effects are most often not studied to identify or associate with the cause though it is widely believed that cases of chronic health problems such as carcinogenicity and reproductive effects are rapidly increasing. Thus the real effects of POP pesticides are often underestimated.

Poisonings in occupationally exposed persons are usually associated with contract spray operator groups or farmers carrying out prolonged spray operations under hot humid conditions without adequate personal protection. Recent poisoning data reveal >80% of poisonings caused by pesticides to be due to wilful ingestion of pesticides for self-harm.

### 2.3.1.3.1 Stocks of outdated pesticides

Though there had been no import of POP pesticides to Sri Lanka in the recent past, a certain amount of outdated pesticides from the earlier imports are stockpiled at different places due to their withdrawal from use. However, large cumulative quantities of other outdated pesticides are available in stocks which have become a national problem for disposal. A complete list of outdated pesticide stocks, with specific locations, available in Sri Lanka is given in the Annex I of the background report on pesticides. This information has been collected by Registrar of Pesticides following FAO guidelines. Except 18 liters of aldrin and 10 kg of DDT (which are tenable to the POP convention), rest of the stock is predominantly of non-organochlorine in origin.

#### 2.3.1.3.2 Contaminated sites and environmental compartments

Contaminated sites are identified as having a history of heavy previous use or locations where pesticides are transported into and deposited from those sites. Though a somewhat complete picture on available stockpiles can be drawn, the situation on contaminated sites with regard to POP pesticides is obscure. DDT and subsequently BHC had been used for malaria vector control programs as a household residual insecticide; door-to-door application in malaria-infested areas in the Dry Zone (Herath, 1984 – not in any reference section!) and in the Wet Zone including some areas of the Colombo district (Dr. R.R.M.L.R. Siyambalagoda, Director, Anti Malaria Campaign-personal communication). Agricultural uses were basically on coconut plantations, tea plantations, horticultural projects and tobacco nurseries. However, area specific potential contamination (non-point pollution sources) could be predicted for aldrin, chlordane, DDT, dieldrin and heptachlor for which there were specific agricultural uses in plantations, horticultural nurseries, non-food crops (e.g. tobacco) and in non-agricultural termite control uses.

Although DDT was totally banned as early as 1976, its precursors and derivatives could be present in the environment for a long period of time and thus could contaminate agricultural produces. In tea, DDT isomers could have been originated from heavy use of dicofol in the past which could be contaminated with DDT isomers depending on the production process adopted in manufacturing dicofol. Due to this reason, the use of dicofol in tea commenced in 1965 was prohibited in 1994. The total consumption of 42% dicofol (Kelthane) emulsifiable concentrate formulation was 2,084 liters from 1988-1992. A large number of estates in Uva, upcountry and mid country experienced heavy mite infestations during dry weather periods necessitating repeated use of miticides (Vitharana, 2003). Therefore, the detection of these pesticides in the environment may be due to agricultural run-off and excessive use or mis-use in the past.

There is no planned monitoring system or infrastructure facility available with the pesticide registration authority to trigger remedial actions to mitigate the problems. So far no proper monitoring studies have been carried out on pesticides. Further, there is no surveillance system in place in the health sector to monitor the trends of health effects with respect to exposure to pesticides from environmental contamination. The data available in environmental concentrations are primarily produced for academic interests or data generated for export of agricultural commodities as a requirement from importing countries (residue levels) rather than for environmental or long-term monitoring purposes. This leads to rather discrete data coverage (spatial and temporal) which makes it difficult to evaluate significant trends of contamination by POP pesticides in the country.

Very little information is available on the concentration of chlordane in the environmental compartments despite the fact that chlordane has been used in Sri Lanka until recently compared to other POP pesticides which have been banned long ages.

Since, some of the organochlorine concentrations are still found in some environmental compartments, coupled with the lack of knowledge on the true picture of toxicological impact of POP pesticides in the environment and human health point of view, the situation would have to be seriously dealt with to achieve environment and human health protection goals. In this context, further research, monitoring and environment protection procedures are critically needed in Sri Lanka.

A compendium of information relevant to all POP pesticides designated under the Stockholm Convention, on production, imports, exports, emissions, stocks, levels in the various environmental compartments, exposure along with relevant sources of data is presented in the Annex II of the background report on pesticides.

## **2.3.1.3.3** Objectives

- To eliminate possibilities in import, distribution and usage
- •To eliminate possible health and environmental adverse effects due to
- stocks of outdated pesticides
- ■To identify information gaps on the status
- ■To reduce pesticide-related environmental adverse effects
- ■To eliminate potential health hazards

#### 2.3.1.3.4 Priority problems

- Unauthorized imports and use of POPs pesticides
- Absence of proper mechanism for safe disposal of outdated stocks of pesticides
- Lack of effective information dissemination system
- Inadequate infrastructure to monitor environmental and human health effects

## 2.3.1.3.5 Legislation:

- Banning of all POP pesticides, of which the uses are already cancelled through a Gazette Notification under the provisions of the Control of Pesticides Act No. 33 of 1980.
- All POP pesticides imported as pure chemicals for research and academic purposes should be subject to licensing: Joint responsibility should be held by Registrar of Pesticides & Department of Customs;

- Revision of existing HS codes (additional national subheading) to ensure accurate identification of chemical consignments with respect to POP pesticides.
- Necessary legal structure to be formulated to reship all unidentified and/or unclaimed chemical consignments held at entry points by the consignee or in case of absence of the consignee, by the shipping agent.

#### 2.3.1.3.6 Administrative measures:

- Disposal of existing stocks of outdated pesticides including POP pesticides.
- Development of infrastructure at Office of the Registrar of Pesticides and Customs for compliance monitoring programs with respect to contamination/adulteration of chemical products with POP pesticides.
- Surveillance on environment compartments (air, sediments, water, soil, biological) and food products for presence of POP pesticides and candidate POP pesticides, including;
  - Assessment of pesticides residues for ground and surface water bodies.
  - Further investigation on the presence of POP pesticide residues in coastal seabed.
  - Study of all pesticides recommended for agriculture on the fate and effects in the environment under the local conditions to ascertain any relevance to POP qualities.
  - Establishment of MRLs for Sri Lanka and devising methods to minimize the residue levels in agricultural commodities.
  - Establish regular pesticide residue monitoring programs on food (local and imported) by strengthening the relevant aspects under the Food Act.
- Surveillance on adverse effects of pesticides including POPs on the environment and human health under the local conditions by;
  - Establishment of a proper surveillance and reporting system (social and scientific) within the health sector on chronic health effects from exposure to pesticides.
  - Establishment of complimentary analytical programs to study the fate of such pesticides in the environmental compartments for the establishment of correlations between presence and their health effects.
- Development of a coordinating system by establishing a network among the health, agriculture, industry and environmental sector research groups through the Office of the Registrar of Pesticides as the focal point for coordination, information collection and sharing and policy decisions for prevention of POP pesticide related adverse effects.

### 2.3.2. POLYCHLORINATED BIPHENYLS (PCBs)

#### 2.3.2.1 Introduction

PCB oils were initially introduced as dielectric fluids for use in electrical equipment such as transformers, capacitors, circuit breakers, voltage regulators etc. because of their excellent dielectric properties and also because of their very low flammability. PCB oil can absorb rapid changes in electrical fields with very little heating up, and hence very little loss of energy. Also, PCB has a very low flash point and no fire point, and therefore, is stable in changing temperatures. They only burn when in contact with an open flame.

When PCBs do burn, they can form Dioxins and Furans. These two gases are highly toxic and their deleterious effects on health have been well demonstrated. Apart from the danger of PCBs producing Dioxins and Furans, they themselves are dangerous substances because of their high stability and their oleophilic nature. They can be easily absorbed by fatty tissues of humans and animals. PCB bioaccumulte in bodies, especially in fat and liver.

PCBs were started to be manufactured on an industrial scale in 1929. They were intensively used between 1930 and 1980. PCBs were gradually phased out for application in electrical equipment from the early 1980s, depending on the country. United States prohibited manufacture and marketing of PCBs from 1979, while the European Union mandated that all PCBs should be destroyed by 2010. In the absence of further information, it was considered that transformers manufactured on before 1986 may contain PCBs.

Capacitors are another type of common equipment that can contain PCBs. The size of capacitors can vary. According to Basel Convention Guidelines for the Preparation of a National Environmentally Sound Management Plan, all capacitors manufactured between 1930 and 1977 contain PCBs as the dielectric fluid.

A very large number of electrical equipment exists today globally, which still contain PCBs. There are several ways in which these transformers or oils therein can reach Sri Lanka. Furthermore, there are a large number of equipment in Sri Lanka contaminated with PCBs, and the challenges are first to identify such equipment, and then to select the most appropriate steps to eliminate the PCBs that they contain.

It is necessary to take decisions in management of PCBs in accordance with the overall objectives of environmental management at national level, and specially in relation to management of chemicals and hazardous waste. Furthermore, they should strengthen environmental management practices at the level of individual owners, industries and companies.

The preliminary PCBs inventory will be the baseline for the phase out process. Environmentally sound management of PCB is necessary throughout their life cycle process. It includes preventive aspects at all stages of the life cycle as well as the maintenance and retro filling of PCB containing equipment.

#### 2.3.2.1.1 Relevant Stockholm Convention Requirements

Annex A requires all Parties to cease production of new PCBs immediately (i.e., entry into force)

All Parties using the (Part II) PCB specific exemption shall:

- eliminate use of in-place equipment containing PCBs by 2025:
  - make determined efforts to identify, <u>label</u> & remove from use equipment with >10% or >0.05% and >5 liters of PCB
  - endeavor to identify & remove from use equipment with >0.005% (50ppm) and >0.05 liters of PCB
  - give higher priority to equipment with higher PCB levels
- promote measures to reduce exposures and risk:

- use PCBs only in intact and non-leaking equipment <u>and</u> only in areas where risk of environmental release can be minimized and quickly remedied
- · forbid use in food and feed production and processing areas
- when used in populated areas (schools, hospitals, etc.)
  - take all reasonable measures to protect from electrical failure which could result in a fire
  - inspect regularly for leaks in equipment
- <u>not</u> export or import PCB equipment, except for the purpose of environmentally sound management (ESM) of waste
- <u>not</u> recover liquids with more than 0.005% PCBs for reuse in other equipment, except for maintenance and servicing
- make determined efforts to achieve ESM of wastes containing >0.005% PCBs ASAP, and by 2028
- endeavor to identify articles with >0.005% PCB for ESM
- report to the COP every five years on their progress in eliminating PCBs [per Article 15]

COP will review progress toward the 2025 and 2028 targets at 5 year intervals.

#### 2.3.2.2 Situation in Sri Lanka

There are many institutions dealing with management of PCBs, contaminated equipment and sites. Roles and Responsibilities of these institutions differ vastly. Following institutions have been identified as main stakeholder institutions, and the inventory have been developed in collaboration with these institutions;

Ministry of Environment, Ceylon Electricity Board, Lanka Electricity Company, Lanka Transformers Limited, Central Environmental Authority, Sri Lanka Customs, Industries, Plantations, Informal Recyclers of waste oil and disposed transformers. The Ceylon Electricity Board (CEB), Lanka Electricity Corporation (LECO) and Lanka Transformers Limited (LTL) can be considered as the three main agencies that deal directly with transformers and capacitors, which may be contaminated with PCBs. These institutions import and handle all transformers used by the state sector and by the power utilities in the country.

Two kinds of transformers are used by the CEB; Step up transformers (Generating Transformers) where voltage is increased in order to reduce the energy loss during transmission and Step down transformers (Power Transformers) where voltage is reduced to assure safety of user and equipment. Generating transformers of 12.5 kV/220kV and 12.5 kV /132kV and distribution transformers of 33kV/415V and 11kV/415kV are presently used by CEB.

CEB purchases high voltage transformers from several foreign vendors on turnkey basis. Before the establishment of LTL, the CEB used to import Distribution Transformers from various countries from over 140 different manufacturers. Presently, the Divisional Operational Centres of the CEB takes these old transformers for repairs to the LTL.

Maintenance of medium voltage transformers is done at the Maintenance Branch of the CEB at Piliyandala. Some repairs are done at Lanka Transformers Ltd, while in case of major repairs, the manufacturer's assistance is sought. Some burnt distribution transformers of CEB are taken to the LTL Yard in Homagama earlier and now to Sapugaskanda, for repairs, servicing or inspection before disposal.

PCBs have been used in transformers and other electrical equipments in Sri Lanka, but the extent of the use have not been assessed before. The Ceylon Electricity Board (CEB), the Lanka Electricity Company (LECO) and the Lanka Transformers Limited (LTL) are the main institutions handling transformers, but there is a dearth of information about the use of PCBs in transformers. Several industries also own and maintain

the transformers that they are holding. However, this is only a small percentage of Distribution transformers. The owners are in the industrial sector, plantation sector and a very few community groups. However, there are no legal provisions to obtain information from the owners regarding the status of these transformers.

Another important sector that needs to be taken in to account are the informal recyclers of transformer oil.

### 2.3.2.3 Priority problems and objectives for PCB management

Informal recyclers of transformers/oil are small scale operators that are scattered throughout the country. Recyclers are engaged in recycling of oil and scraps from transformers, specially the metal parts and porous parts.

Since PCB containing oils are still in use in transformers in detectable amounts, there is a probability of these entering in to recycling operations. Used PCB oils or contaminated transformer mineral oils can be mixed with waste mineral oil, resulting in contamination with low concentrations of PCBs. Industrial Development Board of Sri Lanka acts as an intermediate in procuring decommissioned transformers for recyclers to be scrapped. However, none of these transformers are tested for PCBs before decommissioning.

Presently all decommissioned transformers area sold by the LTL at their Homagama yard and by the LECO at their Wasgamuwa yard. The usual buyer is the Industrial Development Board of Sri Lanka. They in turn scrap the transformers to sell the copper and oil to small scale recyclers, who are engaged in manufacturing of welding transformers, battery charging, motor winding etc., throughout the country.

Industrial Development Board of Sri Lanka (IDB) initiated purchasing of transformers in July, 2003. Numbers of transformers have been purchased from LTL and LECO, from 2003 up to date are in Table 6.

Table 6 Used Transformers purchased and sold by IDB

Seller	Quantity (Nos)
Lanka Transformers Ltd	81 units
Lanka Electricity Company	93 units
Total	174 units

Source: PCB Inventory Ministry, of Environment 2006

Price of transformers varies according to their power capacity. Transformers of capacity range 50kVA-1000kVA are purchased at around Rs. 14,500-80,500.

Composition and amounts of material sold by the IDB since initiation of the program in 2003 are given in table 7.

Table 7. Composition and amounts of material sold by IDB

Material	Quantity
Copper	26,511 kg
Lamination	50,615 kg
Iron	41,311 kg
Oil	210 liters

Source: PCB Inventory, Ministry of Environment 2006

The recyclers use a considerable quantity of used transformer oil in their daily operations. Scraps of transformers are prized mainly for copper. These may contain PCBs impregnated in to the metal.

Saw-dust is used to absorb any oil that is spilled during draining of transformers, and saw-dust soaked with transformer oil is handed over to the relevant local authority for disposal. Therefore, there is a possibility of dumping and burning of saw dust used for cleaning spilled oil, which might contain PCBs. Hence, one of the ways in which environmental contamination with PCBs can occur is through recyclers, scrapping yards and repair yards.

According to the Guidelines issued by the Basel Convention for the Preparation of a National Environmentally sound Management Plan for PCBs and PCB contaminated equipment, the average working life of a transformers is 30 years. However, many countries have determined the age of phasing out at 35 years. Considering the financial and practical position of Sri Lanka as a developing country, it was decided to consider 35 years as the useful age of a transformer.

Table 8: Transformers over 35 years of age as Over Aged.

Category	NO Units	Total weight (kg)	Total Liquid Weight (kg)
Total of units over aged	135	1 018 083	283 458

Source: Preliminary Inventory of PCB, Ministry of Environment 2006

## 2.3.2.3.1 Objectives for PCB Management

- Prevent new entry of PCBs to the country;
- Action plan for the management of equipment;
- Prevent further cross contamination;
- Establishment of adequate testing facilities;
- Prevent PCBs getting in to the environment;
- Environmental and progress monitoring;
- Adequate capacity building for PCB control and management;
- Elimination of existing stocks in an environmentally sound manner;
- Decontamination/ Rehabilitation of contaminated sites.

#### 2.3.2.3.2 Priority problems

- Lack of legislation;
- Lack of complete inventory on PCB equipment;
- Existence of PCB containing equipments/oil/stockpiles;
- Haphazard disposal of decommissioned transformers;
- PCB contaminated sites;
- Import of PCB containing equipment and material;
- Lack of proper temporary storage facilities;
- Lack of identified methods for elimination of PCB contaminated equipment/material;
- Lack of awareness;
- Lack of sufficient testing facilities.

#### 2.3.3 UNINTENTIONALLY PRODUCED POPs

#### 2.3.3.1 Introduction

Dioxins and furans are considered as unintended by products from anthropogenic activities. In Sri Lanka there are several activities that could lead to these by products especially in case of open air burning. There is inadequate legislation in the country for controlling such activities.

However, with regard to imports a control mechanism is in place under the Basel Convention. Under this Convention, processing of some wastes listed in list B can lead to the emissions of dioxins and furans. Hence, if country receives any project proposal involving such waste processing activities, the proposal is closely scrutinised by a National Committee formulated for the implementation of the requirements of the Convention. This Committee studies the project in detail and if assured only that there is no risk of dioxins and furans emissions from the project activity, approval for the project is granted subject to the implementation of relevant precautionary measures.

Dioxins and furans can exert their toxicity at very low levels (microgram levels). Hence detection of dioxins and furans at such very low levels is essential and this requires use of sophisticated equipment/techniques. Sri Lanka does not have such sophisticated equipment at present..

## 2.3.3.1.1 Relevant Stockholm Convention Requirements

Parties shall, at a minimum, take measures to address the following:

- action plan
- · release reduction or source elimination
- substitute materials, products, processes
- new and existing sources
  - best available techniques (BAT)
  - best environmental practices (BEP)
- An action plan shall: [Article 5, para. (a)]
  - be developed within 2 years of entry into force
    - may be national, regional, or sub-regional
    - constitutes part of the overall implementation plan in Article 7
  - · identify, characterize and address release of chemicals in Annex C
  - facilitate implementation of other requirements in Article 5
  - be implemented!
- For industrial sources that Party identifies as having <u>potential for comparatively high</u> formation & release of POPs to environment (*including* those in categories in Annex C Part II), Party must:
  - for new sources warranting such action:

- promote, and as provided for in an action plan, require use of best available techniques (BAT) [Article 5, para. (d)]
  - phase in any BAT requirements for new sources in categories in Annex C Part II as soon as practicable but no later than 4 years after entry into force
- promote use of best environmental practices (BEP) [Article 5, para. (d)]
- for existing sources, promote use of BAT & BEP [Article 5 (e)]

#### 2.3.3.2 Situation in Sri Lanka

The process of developing the inventory was based on both field research (site visits, interview, and personal contacts) and statistical information and the use of the Toolkit to provide default emission factors. In the absence of comprehensive measured data there will always be uncertainty associated with the estimates made.

In general good statistical information is available on those industries that are regulated by the Central Environment Authority and operated under the Board of Investment systems. Information on other processes was harder to gather in some cases.

The main sources of releases of PCDD/F in Sri Lanka were identified as:

- The uncontrolled combustion of wastes, primarily in dumps and in the open;
- The processing of metals, in particular scrap copper where a significant amount of PCDD/F is likely to be associated with the residue from gas cleaning systems;
- The incineration of medical wastes which is largely carried out under poorly controlled conditions;
- Burning of biomass in homes for cooking, industry and for disposal of agricultural residues.

Estimates of releases to air and residues were far greater than for releases to water, land or in products. This reflects both the nature of the main sources (thermal processes giving air emissions and residues from gas cleaning and combustion) and a lack of data to estimate releases to other media.

The process of assembling the inventory has allowed a valuable and extensive database of knowledge on a wide range of processes and activities to be assembled. This knowledge should be reviewed, stored and used as a basis for updating the inventory with any necessary additions, changes and corrections. It will also be of considerable use in assessing other pollutant sources to the environment in Sri Lanka.

In Sri Lanka, testing for dioxins and furans have not been carried out so far except for the recent sampling programme initiated by Holcim Lanka (pvt) Ltd. (the only clinker manufacturer in Sri Lanka) at Puttlam in February 2004. The samples collected were sent to Singapore for dioxins and furans analysis. The results however have not been communicated to the POPs office as yet.

It was possible to make estimates of releases for all the main categories and to identify two types of potential "hot spot". The best data were available on air emissions and the inventory of releases to air is more complete than for releases to water, land, products or residues. There is almost no information on releases to water, in products or to land. Limited information is available on releases to residues.

The largest calculated releases are to air (171 g I-TEQ per year) and in residues (79.5 g I-TEQ per year). Based on limited data releases to water were estimated at 0.079 g I-TEQ per year and in products at 6.27 g I-TEQ per year.

The largest estimated air emissions are from category 6, uncontrolled burning processes (waste and biomass), category 1, waste incineration, category 3, the generation of heat and power, category 2, metal production and processing and category 8, miscellaneous. Between them these account for over 99% of the total estimated emissions to air.

The main source categories contributing to estimated releases in residues were category 2, metal processing and category 6, uncontrolled combustion, between them accounting for over 99% of estimated releases.

For all the open burning categories it was felt that emissions factors that were based on local conditions and local wastes and biomass would help greatly to improve estimates of releases.

Category 2, the production and processing of metals is estimated to contribute significantly to overall releases of PCDD/F in Sri Lanka. In particular the processing of non-ferrous metals. The processing of scrap copper which originates in the middle east is a major industry. The processing plants are fitted with basic wet scrubbers to reduce releases of pollutants to air and the feed materials have to meet the requirements of the Basel Convention (95% metal). Emissions to air and residues have been calculated. The calculated release associated with the flue gas treatment residues is the largest estimated residue release. These residues are meant to be re-exported to the country from where the scrap originates so that with proper management there should not be a significant release to the environment in Sri Lanka. Further information is required to fully characterise this potentially significant source of releases of PCDD/F to air and residues and attention should be paid to potential releases to water arising from the use of wet scrubbers.

The processing of scrap aluminium is also becoming a significant activity. The industrial facilities benefit from scrap sorting and wet flue gas scrubbing which will reduce releases compared to the worst cases. In addition to the industrial-scale processing there is also a widespread, cottage-scale industry melting aluminium (as well as brass) for local products. There is little data that allows to estimate the magnitude of releases from this sector but it is clear that occupational exposures to pollutants are high.

The main source related to combustion in Sri Lanka is likely to be the open or poorly controlled burning of wastes and other materials. The inventory for dioxins and furans has shown that poorly controlled or uncontrolled combustion is a major activity and major source of PCDD/F.

Table 9 : Summary Inventory of Releases for Sri Lanka, 2002

	Category	Releases, g I-TEQ per year				
		Air	Water	Land	Products	Residues
1	Waste Incineration	20.3	0.055	NA	NA	0.133
2	Ferrous and non- ferrous metal production and processing	5.52	ND	NA	NA	49.8
3	Power generation, heat and cooking	19.3	ND	ND	NA	0.096
4	Mineral products	1.37	NA	ND	ND	0.002
5	Transport	0.54	NA	NA	NA	ND
6	Uncontrolled combustion	121	ND	ND	NA	29.4
7	Chemical and consumer products production and use	ND	ND	ND	0.446	ND
8	Miscellaneous	3.46	ND	ND	ND	0.074
9	Disposal/landfill	ND	0.024	ND	6.00	0.022
10	"Hot spots"	Site of chlorine production. Residues from chlorine bleaching of pulp				
	Total	171	0.079	ND	6.45	79.5

Source: Preliminary Inventory of Dioxin and Furans, Ministry of Environment 2006

Preliminary estimates of possible releases of hexachlorobenzene from open waste burning can be made by combining the estimated mass of waste (domestic/industrial/commercial) being burned in landfill fires and in the open with initial estimates for emission factors derived from testing in the US.

Table 10: Estimated air releases of HCB from open burning

			Activity statistic	Emission factor	Estimated annual release,
				Air	Air
Open	Landfill	fires	142,500 t	0.035 mg/kg	4990 g
burning	and	open			
of wastes	burning				

Source: Preliminary Inventory of Dioxin and Furans, Ministry of Environment 2006

Other releases would be expected from the other principal sources of PCDD/F identified in Sri Lanka, in particular other uncontrolled combustion processes, incineration and processing of metals.

## 2.3.3.3 Priority problems and objectives for POPs management

## **2.3.3.3.1 Objectives**

- Implementation of BAT/BEP requirement for new sources in the legislation;
- Implementation of proper solid waste management and disposal mechanisms in accordance with BAT/BEP;
- Implementation of BAT/BEP in secondary metal recycling plants;
- Upgrading the incineration processes in existing crematoria.

## 2.3.3.3.2 Priority problems

- Lack of legislation/s to cover unintentional POPs emissions regulation;
- Lack of data to determine levels in environment to determine extent of contamination.
- Uncontrolled combustion of wastes;
- Medical wastes burning in low technology incinerators or burn pits;
- Processing of scrap metals;
- Household cooking;
- Power generation using heavy fuel;
- Crematoria.

#### 2.3.4 MONITORING

#### 2.3.4.1 Introduction

In order to address the monitoring capacity of POPs it is necessary to address both technical and administrative aspects. Through the two aspects are inter-related it is important that they are taken individually so that the strengths and weaknesses in the regional and local levels could be easily understood. These two aspects should further be considered in qualitative and quantitative terms in respect of monitoring capacity.

## 2.3.4.1.1 Relevant Stockholm Convention Requirements

**Parties must, within their capabilities**, address the following obligations in preparing their action plan to address research, development and monitoring measures (Article 11):

- At the national and international levels, encourage and/or undertake research, development, monitoring and cooperation on all aspects of POPs, their alternatives and candidate POPs, including on (para. 1):
  - · Sources and releases into environment;
  - Presence, levels and trends in humans and the environment;

- Environmental transport, fate and transformation;
- Effects on human health and the environment;
- · Socio-economic and cultural impacts;
- · Release reduction and/or elimination; and
- Harmonized methods for making source inventories and analytical techniques for measuring releases.
- In undertaking the actions in paragraph 1 (para. 2)
  - Support and further develop international programmes, networks and organizations to define, conduct, assess and finance research, data collection and monitoring;

#### 2.3.4.2 Situation in Sri Lanka

While there are a large number of laboratories (ITI, Registrar of Pesticides, SGS, TRI, University of Ruhuna, University of Colombo, NARA, City Analyst Lab, University of Moratuwa, Govt. Analyst Dept., IFS, CRI and NWSDB.) in Sri Lanka with chromatographic facilities, only ITI, Registrar of Pesticides, SGS (private laboratory) and TRI regularly carry out analysis of pesticides, and only ITI carries out analysis of PCB and industrial chemicals. Further ITI is the only laboratory that has international accreditation against ISO 17025 for any of the POPs. (Accreditation has been obtained for pesticides in water) There is no lab with facilities (High resolution GC & HRGCMS) to measure Dioxin & Furan in Sri Lanka.

In order to address the monitoring capacity of POPs it is necessary to address both technical and administrative aspects. Out of the two aspects the most important with respect to monitoring of unintentional by-products is the technical aspect, as there are no facilities in the region to monitor unintentional by-products. Facilities to monitor other POPs are available but there are technical and administrative problems prevailing in the country that retard the development and maintenance of the laboratory monitoring capabilities. viz;

#### 2.3.4.2.1 Priority Problems

- The laboratories that are capable of monitoring POPs have limited funds or funds are mandated for other purposes and hence do not have a budget for environmental monitoring. (e.g. ITI, ROP)
- The authorities responsible administratively for monitoring industrial or environmental aspects (e.g. CEA) do not have the facilities nor do they have necessary funds to obtain the services of the laboratories having the facilities
- Severe lack of technical backup support and supplies for the maintenance of laboratory equipment as well as purchase of analytical consumables. When an instrument requires repair, it is often necessary to bring down technicians from abroad or send the instrument to the manufacturer which is expensive.
- Lack of adequate financial support for sustainability of the facility, especially in weaker economic countries.
- Data generated from laboratories should be reliable and since the carrying out of accurate
  analysis, maintenance of a quality system, and professional maintenance of instruments
  requires expertise and funds. Priority should therefore be to provide funds for existing
  facilities to be maintained, developed and used for monitoring instead of seeking to build
  up many more facilities.

With respect to regulatory and administrative capabilities in Sri Lanka, the capacity is relatively satisfactory with persistent pesticides compared to other POPs, as these have been banned for a long time. In contrast the administrative monitoring capacity for the POPs of industrial origin, PCB and unintended by-products are relatively poor in the Indian Ocean region. At present there is no regulation to prevent PCB from entering the country, and it is also possible to bring other POPs into the country under other HS codes.

### 2.3.4.3 Priority problems and objectives for POPs monitoring

One of the main concerns associated presently with POP pesticides is the possibility of exposure through contaminated sites / environmental compartments resulting from historical uses. However there is very little information available on environmental levels which hinders seriously the arrival at a sound and reasonable prediction on potential human and environmental adverse effects arising from POP pesticides use in Sri Lanka. Existing data however indicates that the degradation products of DDT in particular are present in sediment samples which could be due to historical use or illegal entry might still be taking place into the country. Analysis of samples of imported dry fish indicated again the presence of DDT degradation products suggesting that this might be a route of entry into the country.

As a result of the preparation of the baseline and monitoring analytical reports it was possible to identify some of the key issues in the related field:

- Lack of information on environmental levels of POP pesticides in various environmental compartments and sites where they were used in the past since there is no regular monitoring programme.
- Lack of laboratory to analyse for Dioxins and Furans means that all the values reported are based on calculated values using the toolkit. However it is too prohibitively expensive to establish such a lab.
- PCBs contamination (50-2000ppm) has been reported from hundreds of transformers which complicates the issue as the contamination could be widespread.
- Lack of facilities to monitor the quality of food at the point of import allowing the import of items contaminated with POP pesticides or possible false declarations by the importer.
- Disposal of outdated stocks of POP pesticides in Sri Lanka. e.g. 10 kg of DDT and 18 kg of Aldrin have already been identified to be requiring disposal
- Lack of proper awareness on present status on POP pesticides among all the sectors including scientific community.
- Absence of a proper system to monitor serious human health and environmental adverse effects of pesticides under the local conditions and usage practices.

## 2.3.4.3.1 Objectives

- To get sufficient resources for effective monitoring;
- To prevent importation of contaminated food

## 2.3.4.3.2 Priority problems

- Monitoring problems (technical/financial);
- Risk of importation of contaminated food;
- Presence of POPs in the environment- PCBs and pesticides.

## Chapter

3

## 3.0 STRATEGY AND ACTION PLAN ELEMENTS OF THE NATIONAL IMPLEMENTATION PLAN

The GOSL is committed to protect the environment and also to uphold international commitments made in this regard. On 5<sup>th</sup> September 2001 the GOSL became a signatory to the Stockholm convention and ratified the same on 22<sup>nd</sup> December 2005. The GOSL then followed up with a program of inventorisation of relevant issues and the formation of an action plan (NIP) to meet expected provisions under the convention through a grant from GEF. The chapter 3 describes in detail the GOSL policy, goals, strategies and action plans developed. Cost estimates for various activities are also presented.

As GOSL has also committed to the international conventions and protocols such as Montreal, Basel and Rotterdam, the activities considered under NIP also seek cross program support in realising common goals. Also it is the expectation of GOSL to plan innovatively to implement ideas with future in mind. This is in line with the GOSL thinking on sustainable development for Sri Lanka.

#### POLICY STATEMENT ON POPS MANAGEMENT

As a party to the Stockholm Convention, the Government of Sri Lanka is committed and will take necessary measures to fulfil its obligations and responsibilities. These measures will be implemented within the National Environmental Policy.

### 3.1 SUMMARY OF FINDINGS FROM INVENTORIES

The process of inventorisation and related studies revealed the following issues with regard to the three core groups – pesticides, PCB's and Unintended byproducts of concern. The analysis of problems led to the development of a set of management actions.

#### 3.1.1 PROBLEMS RELATED TO POPS PESTICIDES

- Possibility of illegal imports through false declarations
- Lack of resources for systematic screening of imports
- Environmental impacts and baseline levels not adequately studied
- Lack of sufficient resources for identification and analysis
- Inadequate Health impact data
- Stocks of outdated Non-POPs pesticides still to be disposed.

## 3.1.1.1 Management Actions Identified for - Pesticides

- Improvement of pesticide regulatory system to adequately address the specific issues
- 2. Mechanism to minimise accumulation and safe disposal of outdated pesticides, at all levels
- 3. Development and implementation of proper information gathering and dissemination system
- 4. Develop Laboratories and analytical Capacity
- 5. Monitoring and surveillance of environmental and human health effects

#### 3.1.2 PROBLEMS RELATED TO PCBs

- · Lack of adequate legislation to control imports
- · Environmental impacts and baseline levels not adequately studied
- Lack of sufficient resources for identification and analysis
- Lack of acceptable treatment, disposal and storage systems for PCB contaminated oils and equipment.
- Contaminated sites yet to be identified.
- · Cross Contamination of non PCB oil with PCB oil

## 3.1.2.1 Management Actions Identified for PCBs

- 1. Develop new legislation for management and prevention of new entry to the country
- 2. Establish full inventory of PCB containing equipment
- 3. Establish procedures for equipment maintenance
- 4. Establish appropriate laboratory facilities for PCB analysis.
- 5. Establish and implement guidelines for phase out, transportation, storage and disposal of PCB containing equipment
- 6. Establish progress monitoring mechanisms
- 7. Capacity building for control and management of PCBs
- 8. Disposal of existing stocks and stockpiles
- 9. Rehabilitation and decontamination of contaminated sites

10.Introduce control measures to prevent cross contamination.

#### 3.1.3 PROBLEMS RELATED TO UNINTENTIONALLY PRODUCED BY PRODUCTS

- Lack of information to enable an estimate of releases associated with certain industries burning wastes, in particular textile off cuts and other waste.
- Lack of data on several categories of accidental fires.
- Lack of appropriate emission factors for some sectors. Of particular significance would be the lack of data on releases to water, for example associated with textile and leather industries.
- Lack of emission factors that relate to the burning of wastes and biomass is noted and further testing will greatly increase confidence in the estimated emissions.
- Significant uncertainty in relation to the amounts of waste that are ultimately burned in dumps and landfills, the fate of medical waste and the quantities of biomass that are used in the country.
- Uncertainty over the appropriate emission factors for the metal processes, biomass
  combustion and related to textile and leather processing in addition to the burning of
  wastes in dumps and in the open.

## 3.1.3.1 Management Actions Identified for unintentionally produced by products

- 1. Incorporate BAT/BEP requirement into legislation for new sources
- 2. Review & upgrade relevant legislation/s on solid waste management
- 3. Implement proper solid waste management/disposal mechanism
- 4. mplement proper medical wastes disposal techniques
- Review existing technology on secondary metal recycling plants, including traditional industries, and identify necessary changes for upgrading these systems
- 6. Review existing crematoria designs for their acceptance and identify changes
- 7. Introduce Cleaner Production Technology Concepts to Industry.

This three sets of findings in turn generated several action plans necessary to fulfil monitoring, and knowledge dissemination and reporting. Separately designed action plans finally led to some streamlining of related activities such as in Policy and Regulatory framework design and implementation and in Resource and Development.

#### 3.2 IMPLEMENTATION STRATEGY

The implementation strategy proposes detailed actions to be taken to meet the obligations of the Stockholm Convention, reflecting the specific situation of the country. This was done based on the analysis of the country baseline situation, the provisions of the Stockholm Convention as well as other relevant international treaties and national policies, pursuant to the national priorities and objectives for POPs. Options were identified for institutional and regulatory strengthening, POPs management, awareness raising activities and research and development.

The proposed options are subject of the particular action plans and strategies. For each option an explanatory text describes the rationale behind selecting the particular option as well as the expected capacity of the option to meet the Stockholm Convention requirements.

An implementation strategy table contains information on activities associated with the particular option, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource Requirements, human, capital and operation costs of the identified activities are described, considering the established timeline. The issues related to pesticide and PCBs stockpiles, as well as to pesticides, PCBs and PCDD/PCDF wastes and contaminated sites are included in the respective action plans. Some of the overlapping issues, such as institutional and regulatory strengthening measures and awareness raising activities are mentioned in the compound specific action plans with the reference to the specific action plans, where they are elaborated in detail.

A strategy for information exchange and reporting provides the base for the reporting to the Conference of the Parties (COP) as well as for the future evaluation and updating of the NIP.

The overall strategy, goals and the action plans are outlined in summary form below;

## **Strategy**

Achieve satisfactory POP and related Chemicals Management in Sri Lanka through Public Awareness and Participatory Action within an appropriate legal and institutional framework

#### Goals:

- 1. Integrate into legislation BAT/BEP requirements for new sources
- 2. Review & upgrade relevant legislation/s on solid waste management
- 3. Implement of proper hazardous waste management/disposal mechanism
- 4. Implement of proper medical wastes disposal techniques
- Review existing technology on secondary metal recycling plants, including traditional industries, and identify necessary changes for upgrading these systems
- Review existing crematories designs for their acceptance and identify changes
- 7. Establish environmental regulatory approval authority status to CEA for managing chemicals

#### **Action Plans:**

Action Plan 1: Institutional and Regulatory Strengthening Measures;

Action Plan 2: POPs Pesticides;

Action Plan 3: PCBs and Equipment Containing PCBs;

Action Plan 4: Unintentionally Produced POPs Byproducts;

Action Plan 5: POPs Monitoring;

Action Plan 6: Information Exchange and Reporting; Public Awareness, Information Dissemination and Training;

#### 3.3 STRATEGIES AND ACTION PLANS

## 3.3.1 ACTION PLAN 1': INSTITUTIONAL AND REGULATORY STRENGTHENING MEASURES

## 3.3.1.1 Management Activities

The following 10 activity areas were identified for institutional and regulatory strengthening: based on the analysis of the country baseline situation, provisions of the Stockholm Convention as well as other relevant international treaties and national policies, pursuant to the national priorities and objectives for POPs management.

- 1.Formulate regulation for management, handling and phase out of PCBs and PCBs containing material
- Develop policies on setting up of new foreign investment projects related to POPs Chemicals
- 3.Establish Legislation requiring the use of BAT/BEP for new installations and upgrading the existing systems
- 4.Identify contaminated sites and develop de-contamination programs with required funding, appropriate technology and time targets
- 5. Strengthen monitoring and institutional capacities at the point of import
- 6.Implement Hazardous chemical management systems including POPs
- 7. Improve pesticide regulatory system
- 8. Review and upgrade relevant legislation on solid waste management

## Research and Development

- 9. Evaluation of current/future technologies and identification of alternative technologies.
- 10. Evaluate PTS for candidate POPs action

Note: Management activity 7 is covered under the Action Plan (AP) on POP pesticides and management option 8 is covered under the AP on unintentionally produced POPs by-products.

The proposed activities for realising the objectives are described in more detail in the following text. For each activity an explanatory text describes the rationale behind selecting the particular idea as well as the expected capacity of the activity pathway to meet the Stockholm Convention requirements.

An implementation strategy table contains information on activities associated with the particular management option, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

### 3.3.1.2. Implementation strategy

Even though Sri Lanka has ratified the Basel Convention on the Control of Transboundary Movements of Hazardous wastes and their Disposal, there are certain gaps in the national legislation which require to be filled in order to effectively control the importation of POPs chemicals/wastes.

Import and use of Pesticides are being controlled through the Control of Pesticides Act by the Registrar of Pesticides. However the existing regulatory mechanism to control POPs other than pesticides is insufficient. Therefore the highest priority should be given to the prevention of fresh stocks of POPs chemicals coming into the country in the form of pure chemicals, POPs containing equipment or as waste materials.

As PCBs have been used worldwide in a wide variety of industrial and consumer applications there is a need to be aware of flow of used products/wastes coming into the country. As such, a possibility exists that PCB containing and contaminated equipment may be exported to countries such as Sri Lanka. According to the investigations made during the PCB inventory preparation, Sri Lanka does not need PCB anymore as there are sufficient alternatives. Phasing out of existing stocks of PCBs in the country would not be a problem as long as fresh stocks of PCBs are not brought in legally or illegally. Since there is no specific legislation or regulation imposing a specific ban on the import of PCBs, gazetting such a regulation banning the import of PCB and PCB containing equipments/ waste material is a priority.

Therefore, the banning of PCB immediately would be an essential and important step towards the minimization of environmental and health risk due to accumulation of PCBs. Alternate options to address the problem range from leaving existing laws in place while filling the gaps with new laws or voluntary initiatives, amendment of existing laws or introducing new comprehensive legislation.

## 1. Formulate regulation for management, handling and phase out of PCBs and PCBs containing material

## 1a. Prohibit imports of PCBs and PCB containing equipments under Import & Export Control Act

A complete and immediate ban on the import of PCBs (both waste and PCB containing equipments) and other POPs industrial chemicals through the Import and Export Control Act is the fastest and straightforward measure as that seems to be the best solution in this regard. Further the regime of penalties is effective and consistent. However, a new act if it is deemed necessary may be considered in the future.

Table 11 (a): Prohibit imports of PCBs under Import & Export Control Act

	Option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1a.	Prohibit imports of PCBs under	Import & Ex	port Control Act	t.,	
1a.1	Evaluate the Existing law and gaps and propose amendments or new regulations	2007	CEA,ME,Dept of Im & Ex, Dept. of Customs & other stakeholders	Evaluation Report with Proposals	Regulation s under the Basel Conventio n
1a.2	Drafting	2007	-do-	Amendments New Regulations	
1a.3	Approvals	2007	Dept of Im. & Ex. ,CEA, ME	Approvals	
1a.4	Gazette the regulation	2007	-do-	Regulation gazetted	
1a.5	Monitor Implementation	2008- cont.	-do-	Zero imports	_

## 1b. Formulate regulation under the NEA for management, handling and phase out of PCBs and PCBs containing material

Legislative reform for the management (inventory, labelling, reporting), handling (maintenance, transport, disposal) and phasing out of PCBs and PCB containing material (equipment and wastes) is an urgent need. Relatively high health, safety and environment risks associated with PCBs were identified and in the absence of effective recording, labelling, reporting mechanism, there is a significant shortage of reliable data in order to arrive at decisions and formulate policies with regard to their phase out and final disposal by the year 2025 for equipment, and 2028 for wastes respectively. Therefore there is an urgent need for an integrated law to effectively manage existing PCBs stocks in order to regularly update the PCBs inventory and gradually phase out the PCBs containing equipment as well as dispose of the PCBs containing waste.

Table 11 (b): Formulate regulation under the NEA for management, handling and phase out of PCBs and PCBs containing material

	Option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	activities/
0	1	2	3	4	5
1b	Formulate regulation under the PCBs containing material	NEA for man	agement, handlir	ng and phase o	ut of PCBs and
1b.1	Draft regulations with Enabling regulation for reporting requirements and phase out date	2007/8	CEA, ME, Users	Regulations	Drafting of regulations would be provided
1b.2	Obtain necessary approvals	2007	ME	Legislation in place	under the Import and
1b.3	Gazette the regulation	2007/8	ME, CEA		Export Control
1b.4	Develop Guidelines & Standards for PCB life cycle management/control	2007/8	CEA	Guidelines	Act. Under the NEA also regulations

1b.5	Develop system to monitor the fate of the existing PCB containing equipments and repairs	2008	CEA, LEB, LECO	GI &Std in place	could be drafted. If no provisions are available
1b.6	Implement the regulations	2008/9	CEA	Inventory completed	amendments to the Act
1b.7	Monitor Compliance	2009 cont.	CEA	Compliance mechanism	would be required.

A consideration of the CEA as a regulatory authority for managing chemicals overall in the country from an environmental standpoint will considerably ease management. The CEA will have the powers to designate authority under specific instances in collaboration with the Ministry of Environment. For example, the ROP can be the designated authority for pesticides. This will ensure even future developments.

## 2. Develop policies on setting up of new foreign investment projects related to POPs Chemicals

There is evidence that many of the polluting industries being rejected in developed countries are being shifted to Developing countries like Sri Lanka.

The uncontrolled usage of chemicals / Hazardous Substances, and Waste have become a serious concern from the point of view of the society, as exposure to chemical pollution and hazards have a number of adverse effects to the environment and human health.

There is evidence that in Sri Lanka certain foreign investment projects are being allowed without a proper evaluation on knowledge of their possible adverse impacts. Such projects may include those which emit large quantities of unintentionally produce POP's such as Dioxin and Furan. Therefore a clear-cut policy should be put in place not to allow such polluting industries within the country which could result in irreversible health and environmental damage. BOI should be encouraged to develop a policy to exclude industries that will compromise Sri Lanka's international environmental obligations as well as affecting national environmental conservation strategies (ie. The adoption of a negative list of industries and giving due publicity).

Table 11 (c): Develop policies on setting up of new foreign investment projects related to POPs Chemicals

	Option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2	Develop policies on setting Chemicals	up of new 1	oreign investme	nt projects relate	d to POPs
2.1	Carryout the study regarding existing foreign investment projects .	2007	BOI, ME, My of Ind.	Evaluation report	Considerat ion of POPs issue in EIA/IEE. Raise Awareness

2.2	Evaluate the current policy regarding foreign investments	2006	<b>MIP</b> , BOI, other related. min <sup>4</sup> .	Evaluation Report
2.3	Identify Projects which need to be controlled or not allowed.	2007	-do-	List of projects
2.4	Amend the current policy	2007	-do-	Amended policy
2.5	Implement the Policy	2006/7	-do-	Regulations and necessary guidelines and procedures
2.6	Monitor and make necessary changes to the policy	2007 cont.	-do-	Progress

## 3. Establish Legislation requiring the use of BAT/BEP for new installations and upgrading the existing systems

Under the Stockholm Convention on Persistent Organic Pollutants, Parties are obligated to promote in some cases and require in others the use of best available techniques (BAT), and promote the application of best environmental practices (BEP). As Sri Lanka does not have financial capability to establish Dioxin and furan monitoring/ measuring system application of BAT and BEP are the best solution to control this unintended production of unintentional POPs from industrial purposes. An existing pollution control tools specified in the regulations gazetted under the NEA such as EPL procedure could be used in this regard.

Table 11 (d): Establish Legislation requiring the use of BAT/BEP for new installations under existing legislation on Environmental protection Licence

	Option / Activities	Time frame	Responsible / supporting Institution(s)	indicator o	activities/
0	1	2	3	4	5
3.	Establish Legislation requirir existing legislation on Environ			for new insta	llations under
3.1	Evaluate existing systems	2007	CEA/BOI/ID B/ NCPC/ITI	Evaluation report	Establishment of emission
3.2	Propose suitable BAP/BEP technologies for existing systems	2007	CEA, ITI, NCPC, ME, BOI	List of suitable technologies	standards for Dioxin & Furans is
3.3	Identify a strategy for promotion of these technologies e.g:: regulations/ market based incentives	2008	CEA, ME, My of Ind. NCPC	A strategy	impractical at the present time as the costs involved
3.4	Prepare a schedule for implementation of suitable BAT/BEP technologies	2008	CEA, ME, My of Ind, NCPC	Work plan	would be prohibitive for industry. The
3.5	Supplementary Environmental Review for new installations	2008/10	Industries/ CEA	Reduce unintended by products	use of BAT/BEP is the most
3.6	Tax incentives/subsidies for adoption of BAT &BEP	2009/10	My. of Finance, MENR	Improved Techniques	practical solution in this regard.
3.7	Monitoring	2010/11	Monitoring committee	Progress	

<sup>&</sup>lt;sup>4</sup> Other ministries related to industrial development

## 4 Identify contaminated sites and develop a de-contamination programme with required funding and time targets

In the absence of integrated hazardous waste management facilities in the country for disposal of hazardous waste, industries dispose industrial waste with municipal waste or separately in all haphazard way. Hence, there may be lot of contaminated sites with hazardous substances including POPs due to this uncontrolled disposal. During the initial investigation of POPs contaminated sites, it was noted that outdated transformers and capacitors were stored in open areas without any control measure which could lead to heavy contamination of surrounding areas. (PCB Inventory)

There is an urgent need to identify contaminated sites and prepare procedure to screening and apply environmentally sound control measures in order to stop further pollution and if need to apply remedial measures for such contaminated sites.

Table 11 (e): Identify contaminated sites and develope a decontamination programme with required funding and time targets

	<b>Option /</b> Activities	Timeframe	Responsibl e / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4	Identify contaminated sites a funding and time targets	nd develope	a decontamina	ation programn	ne with required
4.1	Identify an effective integrated methodology for possible contaminated sites	2008	CEA, ME, BOI, IDB etc	A strategy	echnology isfer and acity Building of eholders is a c prerequisite
4.2	Identify prioritization criteria	2008/9	-do-	Set of Criteria	
4.3	Establish an evaluation mechanism of the extent of pollution	2009/10	-do-	A report	
4.4	Establish expert committee for decision making	2009/10	-do-	A TEC established	
4.5	Prepare decontamination & monitoring programs based on their recommendations	2011	-do-	A report	
4.6	Implementation	2012 on wards	-do-	Implementatio n strategy	

#### 5. Strengthen monitoring and institutional capacities at the point of import.

Several laws such as Pesticides act, contain provisions for registration and licensing of certain chemicals.

Sri Lanka Ports Authority finds it difficult to implement the existing law to avoid accumulation of hazardous chemical waste due to practical limitations. The chemical names are changed on documents due to the lack of means of qualitative verification incorporated into the process of clearance of chemicals at Customs . It is also important to note that the current tax structure for chemical goods is not designed in a way to contribute to managing the type and quantity of chemicals being imported.

The Customs Tariff Guide, which is an adoption of the Harmonized System (HS) Code, used by the Customs Officials, only facilitates the identification of the chemical or the chemical group, mainly for tax purposes. It does not contain any information on the toxicity or hazards of the chemicals. The Customs Tariff Guide does not give a complete list of chemicals as some HS numbers represent a group of chemicals, which may include several chemical varieties. To expedite controls it is important to quickly establish 8-digit code with national numbers. Customs should be strengthened in terms of environmental monitoring and control. Therefore the monitoring facilities including Technical competency in terms of expertise as well as infrastructure should be improved at the point of import.

Table 11 (f): Strengthen monitoring and institutional capacities at the point of import

	<b>Option /</b> Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
5.	Strengthen monitoring and institu	ıtional capacit	ties at the point o	of import	
5 1	Identify the necessary requirements and sectors to be improved/ upgraded	2006/7	Customs, Ports Authority, Airport & Aviation Authority	Report	Prepare Network of Stakehold ers
5.2	Upgrade laboratory facilities	2007/8	-do-		
5.3	Train Personnel on better detection and monitoring	2007/8	-do-	Better detection of illegal imports	
5.4	Identify information dissemination system	2006	-do-	Dissemination progress	
5.5	Establish such a system	2006/7	-do-	System Established	
5.6	Disseminate information among stakeholders	2007	-do-	Feedback reports from stakeholders	

#### 6. Implement Hazardous chemical management systems including POPs

A legislative reform for the management of chemicals including POPs is an urgent need due to rapid growth in production, trade, trafficking and use of a wide variety of chemicals in the country. Health, safety and environment risks associated with hazardous chemicals are expected to rise in the absence of effective regulations and hence there is an urgent need for an integrated law to effectively regulate the import, storage, transport, handling, sale, use, recycling and disposal of Industrial Chemicals in the country. This law should comply with the principles of Strategic Approach for International Chemical Management (SAICM). Since Sri Lanka is a party to the Rotterdam Convention as well, conformity with it is also necessary.

Table 11 (g): Implement Hazardous chemical management systems including POPs

	Option / Activities	Time frame	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
6	Implement Hazardous chei	mical manager	nent systems ir	ncluding POPs	
6.1	Identify Strategy	Mid 2007	CEA.,ME, ROP,ITI,BOI	Strategy	Comment: POPs waste
6.2	Identify Implementing Agency	2007	-do-		Will have to be
6.3	Draft legislation	2008	-do-	Legislation in place	addressed Through
6.4	Obtain necessary approvals	2008	-do-		implementati on of Basel
6.5	Implementation	2008	-do-	Haz.Chemical Mgt.& Tracking System in place	Conv.,& internal HWM reg.
6.6	Evaluate the Strategy	2008	CEA,MEand Multidisciplina ry Committee		

#### 7. Improve pesticide regulatory system

The management activities and implementation strategy to improve pesticide regulatory system is detailed under the Action Plan (AP) on POP pesticides.

#### 8. Review and upgrade relevant legislation on solid waste management

The management activities and implementation strategy to Review and upgrade relevant legislation on solid waste management is covered under the AP on unintentionally produced POPs by-products.

#### 3.3.1.2.1 Research and development

The proposed research and development actions are described in more detail in the following text. For each proposed R&D action an explanatory text describes the rationale behind selecting the particular option as well as its expected capacity to facilitate NIP implementation.

An implementation strategy table contains information on activities associated with the particular R&D action, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

# 9. Evaluate of current / future technologies and identification of alternative cleaner production technologies

Under the Stockholm Convention on Persistent Organic Pollutants, Parties are obligated to promote in some cases and require in others the use of best available techniques (BAT), and promote the application of best environmental practices (BEP). In Sri Lanka majority of the industries follow conventional methods evolved form the past experiences. Therefore the time has come to evaluate the situation and to identify the applicable BAT and BEP in Sri Lanka. NCPC can play a major role here under the National Cleaner Production Policy as an affiliate of the Ministry of Industries / UNIDO

Table 11 (h): Evaluation of current / future technologies and identification of alternative cleaner technologies

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
9	Evaluation of current / future technologies	re technolog	ies and identific	cation of alternat	ive cleaner
9.1	Upgrade preliminary Inventories	2006-2007	ME, FCCISL, CEA /BOI/NWPA/Mi n of Industries	Upgraded Data base	
9.2	Evaluation of alternative technologies	2008	Universities/ ITI/ NERD/ NCPC	No of TT	
9.3	Identify implementation strategy and a policy		CEA/ITI/BOI/ Min of Industries/ NCPC	Policy formulated	
9.4	Necessary steps for upgrade the existing systems including training and awareness	2008	BOI, Min of Industries, ITI, CEA	Report on progress of upgrades	
9.5	Monitoring the performance		Min of Env, CEA, BOI	Reports	

#### 10. Evaluate PTS for candidate POPs action

According to the literature and current investigations there are PTS identified as candidate POPs that will affect human health and the environment. In this context it will be vital need to asses the behaviour of these chemicals and the uses of these substances and include those in the management system in Sri Lanka.

#### Table 11 (i): Evaluate PTS for candidate POPs action

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
10	Evaluate PTS for candidate PO	Ps action			
10.1	Assess current situation	2007	Consultants & relevant Labs	Status report	
10.2	Recommend potential POPs for management	2008	-do-	Expanded POPs list	
10.3	Include those to the management system	2008	ME	Document containing management measures	

# 3.3.1.3 RESOURCE REQUIREMENTS

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I	10,100	5,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	0
,	Prohibit imports of PCBs	ပ	2,400	5,400	2,400	1,000	1	1		4,000		0
<u> </u>	under Import & Exports Act.	0	8,100	3,000	6,400	6,400	6,400	6,400	6,400	6,400	6,400	0
		<b>-</b>	20,600	14,200	13,600	12,200	11,200	11,200	11,200	15,200	11,200	0
	Evaluate the Existing law and	I	7,200									
7	gaps and proposals for	ပ	2,400									
<u>a</u>	amendments or new	0	6,400									
	regulations	<b>-</b>	16,000	•	•	•	•	•	-	•	•	0
		I	2,400									
		ပ	ı									
1a2	Drafting	0	1,200									
		T	3,600	•	-	-	-	•	-	•	•	0
		I	200									
		ပ										
1a3	Approvals	0	200									
		T	1,000	•	-	-	-	•	-	•	•	0
		I		1,000								
		ပ										
1a4	Gazette the regulation	0		200								
		⊢	•	1,500	•	•	-	•	•	•	•	0
		I		4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	
		ပ		5,400	2,400	1,000						
1a5	Monitor Implementation	0		2,500	6,400	6,400	6,400	6,400	6,400	6,400	6,400	
		_	•	12,700	13,600	12,200	11,200	11,200	11,200	15,200	11,200	0
	_											

All costs are in US\$

										•		
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I	3,600	8,200	4,800	4,800	4,800	4,800	4,800	4,800	4,800	0
7	Prohibition of import of	ပ	1,200	6,400	0	0	6,400	0	0	0	4	0
2	PCBs under NE Act	0	2,000	5,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	0
		_	6,800	20,400	9,600	9,600	16,000	9,600	9,600	9,600	9,604	0
		I	2,400									
7	Eormidating of maillations	ပ	1,200								4	
2		0	2,000									
		⊢	2,600	0	0	0	0	0	0	0	4	0
	3	I	1,200									
15.2	Drafting-Incorporate the	၁										
701	regulation with the regulation	0										
		F	1,200	0	0	0	0	0	0	0	0	0
		н		1,000								
153	ماصريصوم	ပ										
3	Applovais	0										
		⊢	0	1,000	0	0	0	0	0	0	0	0
		I		2,400								
7	Correction the rection	၁										
<u>†</u>		0		1,000								
		⊥	0	3,400	0	0	0	0	0	0	0	0
		I		4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	
1 አላ	Implementation and	ပ		6,400			6,400					
2	monitoring	0		4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	
		T	0	16,000	9,600	9,600	16,000	9,600	9,600	9,600	9,600	0

H-Human costs C-Capital costs O-Operational costs T-Total costs

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		Н	0	7,600	13,600	0	0	0	0	0	0	0
	Prohibit imports of PCBs	၁	0	2,600	11,000	0	0	0	0	0	0	0
د_	under new Act.	0	0	5,000	7,000	0	0	0	0	0	0	0
		T	0	15,200	31,600	0	0	0	0	0	0	0
		т		4,800								
7	Determine chemicals to be	ပ		1,000								
<u>-</u>	or complete han	0		3,000								
		<b>-</b>	0	8,800	0	0	0	0	0	0	0	0
	(	н		2,800								
2,	Urant Act on Control of Indian	C		1,600								
<u> </u>	Industrial Orienticals Including	0		2,000								
	) -	_	0	6,400	0	0	0	0	0	0	0	0
		Н			6,400							
7	Obtain Commitment of the	ပ			000'9							
3	relevant stakeholders	0			3,000							
		T	0	0	15,400	0	0	0	0	0	0	0
		Ŧ			1,200							
2	Approval from the LD	၁										
<u>\$</u>		0										
		_	0	0	1,200	0	0	0	0	0	0	0
		Н			1,200							
70		C										
3	Cabillet apploval	0										
		_	0	0	1,200	0	0	0	0	0	0	0
		Н			4,800							
7	Enactment of the appropriate	ပ			2,000							
<u>3</u>	law	0			4,000							
		T	0	0	13,800	0	0	0	0	0	0	0

			2002	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Regulations for implementation of	I	0	0	8,600	38,000	42,800	12,800	4,800	4,800	4,800	0
7	reporting mechanism for to	ပ	0	0	1,500	23,200	25,600	3,600	2,400	2,400	2,400	0
5	regularly update the PCB inventory with a phase out plan PCB	0	0	0	5,000	16,400	20,400	6,400	4,000	4,000	4,000	0
	containing material under NEA.	_	0	0	15,100	77,600	88,800	22,800	11,200	11,200	11,200	0
	L	I			4,800							
7	Uratt regulations with Enabling	၁			1,500							
<u>-</u>	regulation for reporting requirements and phase out	0			3,500							
		_	0	0	9,800	0	0	0	0	0	0	0
		I			1,000							
7		ပ										
70-	Obtaill Necessary approvais	0			200							
		_	0	0	1,500	0	0	0	0	0	0	0
		I			1,000							
7		ပ										
3	Gazette the regulation	0			200							
		T	0	0	1,500	0	0	0	0	0	0	0
		I			1,800							
7	Prohibit Importation of PCB and	၁										
<u></u>	PCB containing equipments	0			200							
		F	0	0	2,300	0	0	0	0	0	0	0
		I				10,000	10,000					
7,7	Develop Guidelines & Standards   for BCB life and a	С				12,000	12,000					
3	IOI F CB IIIE CYCIE   management/control	0				6,000	000'9					
		T	0	0	0	28,000	28,000	0	0	0	0	0
		I				20,000	20,000					
200	fate of the existing DCB containing	ပ				10,000	10,000					
3	equipments and repairs	0				8,000	8,000					
		Т	0	0	0	38,000	38,000	0	0	0	0	0
		I				8,000	8,000	8,000				
727	molement the regulations	ပ				1,200	1,200	1,200				
<u>}</u>	ווואפוופווי הופ ופאמשמטוי	0				2,400	2,400	2,400				
		_	0	0	0	11,600	11,600	11,600	0	0	0	0
		I					4,800	4,800	4,800	4,800	4,800	
ζ	Monitor compliance	ပ					2,400	2,400	2,400	2,400	2,400	
<u> </u>	ואוסווונטן כסוויףוומויכס	0					4,000	4,000	4,000	4,000	4,000	
		<b>-</b>	0	0	0	0	11,200	11,200	11,200	11,200	11,200	0

12,800 10,400 2,500 2,000 3,500 17,300 15,900 6,400
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2,000
1,000
9,400 -
6,400
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1,000
- 006'2
6,400
2,000
1,000
9,400
4,000
2,500
6,500

			2002	2008	2009 2010	2010	2011	2012	2013	2014	2015	2016
	Establish Legislation	I		14,400	44,500	16,500	16,500	16,500	8000	8000	0	
	requiring the Use of	C		2,500	120,000	120,000   1,010,000	1,010,000	1,010,000	10000	10000	0	)
က	BAT/BEP for new installations under existing	0		5,500	31,000 37,000	37,000	37,000	37,000	25000	25000	0	
	legislation on Environmental											
	protection Licence	<b>-</b>		22,400	195,500	22,400   195,500   1,063,500   1,063,500	1,063,500	1,063,500	43000	43000	0	0
		I		2,400								
4	2 4 Evoluate existing eventual	C		1,000								
<u>-</u>		0		2,500								
		_		2,900			•	•	0	0	0	0

2016				0				0				0				0				0				0
2015				0				0				0				0				0				0
				0				0				0				0								
2014				)				)								)				•	8,000	10,000	25.000	43,000
2013				0				0				0				0					8,000	10,000	25.000	43,000
2012				•				•				•				•	8,500	1,000,000	12,000	1,020,500	8,000	10,000	25.000	43,000
2011				•				•								•	8,500	1,000,000	12,000	1,020,500	8,000	10,000	25.000	43,000
2010				•				•								•	8,500	1,000,000	12,000	1,020,500	8,000	10,000	25.000	43,000
2009					8,000	000'9	5,000	19,000	20,000	8,000	000'9	34,000	8,000	000'9	8,000	22,000	8,500	100,000	12,000	120,500				
2008	12,000	1,500	3,000	16,500																				
2007				•																0				0
	H	ပ	0	T	ェ	ပ	0	_	I	C	0	_	Н	၁	0	T	ェ	C	0	<b>-</b>	I	С	0	<b>-</b>
		Proposal of suitable BAP/BEP	technologies could be adopted in the existing exstems			Identify a strategy for	promotion of these			Prepare a schedule for	RAT/RED technologies							Tax incentives/subsidies for	adoption of BAT &BEP				Monitoring	
		c	3.2			c	o.0			7	4			о П				0					3.7	

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										<b>↑</b>		
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Identify contaminated sites	ェ	0	20,000	47,900	25,000	25,000	25,000	0	0	0	0
_	and development of a de	C	0	8,000	20,000	200,000	200,000	200,000	0	0	0	0
t	contamination programme	0	0	3,000	22,000	50,000	50,000	20,000	0	0	0	0
	with time targets	_	0	31,000	89,900	275,000	275,000	275,000	0	0	0	0
4.1	4.1   Identify an effective integrated	н		20,000	20,000							
	methodology for possible	၁		8,000	8,000							
	contaminated sites	0		3,000	3,000							

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
			0	31,000	31,000	0	0	0	0	0	0	0
		Н			6,400							
7	Locatify prioritization oritoria	ပ			4,000							
1. 1.	identiny produktation criteria	0			4,000							
		_	0	0	14,400	0	0	0	0	0	0	0
		I			9,000							
7	Establish an evaluation	ပ			3,000							
t. 5	necrialism of the exterit of	0			8,000							
		T	0	0	20,000	0	0	0	0	0	0	0
		ェ			200							
7	Establish expert committee for	ပ										
‡ †	decision making	0			1,000							
		_	0	0	1,500	0	0	0	0	0	0	0
	0	н			12,000							
7	Prepare decontamination &	ပ			5,000							
į.	their recommendations	0			6,000							
		┙	0	0	23,000	0	0	0	0	0	0	0
		ェ				25,000	25,000	25,000				
7	mplementation	၁				200,000	200,000	200,000				
j f		0				50,000	50,000	50,000				
		_	0	0	0	275,000	275,000	275,000	0	0	0	0

All costs are in US\$

2016 0 0 0 0 2015 0 0 0 2014 7,200 5,400 0 0 12,600 7,200 2013 5,400 0 0 12,600 2012 12,600 5,400 7,200 0 2011 5,400 5,000 7,200 17,600 0 66,400 87,200 **268,600** 30,000 2010 115,000 36,000 100,000 36,000 76,400 30,000 2009 100,000 135,000 59,200 270,600 36,000 83,900 105,400 96,800 8,400 4,000 2,400 70,000 30,000 2008 286,100 14,800 2,400 14,800 2007 8,400 4,000 8,400 4,000 2,400 14,800 0 ェ 0  $\mathbf{I}$ ပဝ I S Strengthening of monitoring and institutional capacities at the point of import requirements and sectors to Upgrade laboratory facilities be improved/ upgraded Identify the necessary 5.2 5.1

2

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		T	0	136,000	166,000	166,000	0	0	0	0	0	0
		I		25,000	25,000	25,000						
r,	Train Personnel on better	С		15,000	15,000	15,000						
5	detection and monitoring	0		50,000	10,000	50,000						
		⊥	0	90,000	50,000	90,000	0	0	0	0	0	0
		I		4,500								
7	Identify information	ပ		6,400								
4	dissemination system	0		2,400								
		T	0	13,300	0	0	0	0	0	0	0	0
		Н		10,000	10,000							
T.	سرئین د طمین طوناطریات	ပ		10,000	15,000							
		0		12,000	12,000							
		⊢	0	32,000	37,000	0	0	0	0	0	0	0
		I			5,400	5,400	5,400	5,400	5,400	5,400		
ι Ω	Disseminate information	ပ			5,000		5,000					
5	among stakeholders	0			7,200	7,200	7,200	7,200	7,200	7,200		
		_	0	0	17,600	12,600	17,600	12,600	12,600	12,600	0	0

All costs are in

6.3         Examplement, including legislation         Company of the											OS&		
Hazardous chemical management, including Pops         H         0         16,800         9,400         6,500         0				2007	2008	2009	2010	2011			2014	2015	2016
management, including POPs         C         0         7,400         6,500         6,500         6,500         0			I	0	16,800	9,400	9,400	0	0	0	0	0	0
Pops         T         0         7,800         8,500         19,400         0	<b>u</b>	Hazardous cnemical	ပ	0	7,400	6,500	6,500	0	0	0	0	0	0
T         0         32,000         24,400         19,400         0	•		0	0	7,800	8,500	3,500	0	0	0	0	0	0
Identify strategy         C			-	0	32,000	24,400	19,400	0	0	0	0	0	0
Identify strategy         C         500         0			I		2,400								
To be sufficiently strategy and control strategy	۵ 7	Vooteste Vitagol	C										
T         0         2,900         0 <td>- </td> <td>identily strategy</td> <td>0</td> <td></td> <td>200</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	- 	identily strategy	0		200								
Identify implementing agency         C         1,000         <			_	0	2,900	0	0	0	0	0	0	0	0
Identify implementing agency         C         1,000         <			н		1,000								
Draft legislation         T         0         1,000         0	0		ပ										
T         0         1,000         0 <td></td> <td></td> <td>0</td> <td></td>			0										
Draft legislation			_	0	1,000	0	0	0	0	0	0	0	0
	6.3	Draft legislation	н		6,500								
			၁		2,400								
			0		1,800								

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		<b>-</b>	0	10,700	0	0	0	0	0	0	0	0
		I		200								
7		၁		1,000								
1	Obtail Hecessaly approvais	0		200								
		T	0	2,000	0	0	0	0	0	0	0	0
		I		6,400	6,400	6,400						
G G	moltotion and a series	C		4,000	4,000	4,000						
		0		5,000	2,000	2,000						
		T	0	15,400	15,400	15,400	0	0	0	0	0	0
		I			3,000	3,000						
u u		C			2,500	2,500						
		0			3,500	3,500						
		<b>-</b>	0	0	9,000	9,000	0	0	0	0	0	0

All costs are in US\$

			•		•					9	•	
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	R&D: Evaluation of current /	Н	0	30,000	000'99	80,800	48,400	48,400	0	0	0	0
<u> </u>	future technologies and	С	0	6,000	40,000	788,400	756,000	756,000	0	0	0	0
n 	identification of alternative	0	0	12,000	32,000	49,800	37,000	37,000	0	0	0	0
	cleaner technologies	_	0	48,000	138,000	919,000	841,400	841,400	0	0	0	0
		н		30,000	30,000							
-	Upgrade preliminary	C		6,000	4,000							
-	Inventories	0		12,000	12,000							
		T	0	48,000	46,000	0	0	0	0	0	0	0
		Н			36,000	36,000						
0		ပ			36,000	36,000						
9.7	technologies	0			20,000	20,000						
		_	0	0	92,000	92,000	0	0	0	0	0	0
		I				4,800						
0	Identify implementation	С				2,400						
	strategy and a policy	0				4,800						
		_	0	0	0	12,000	0	0	0	0	0	0
9.4	Necessary steps for upgrade	н				40,000	40,000	40,000				
	the existing systems including	ပ				750,000	750,000	750,000				
	training and awareness	0				25,000	25,000	25,000				

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		T	0	0	0	815,000	815,000	815,000	0	0	0	0
		I					8,400	8,400				
0	Monitoring the performance	С					0000'9	6,000				
		0					12,000	12,000				
		T	0	0	0	0	26,400	26,400	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I		25,400	000'6	1	1			1		
5	R&D: Evaluate PTS for	ပ	1	9,400	5,400	1	1	1	1	1	1	
2	candidate POPs action	0	1	18,000	7,200	1	1	1		1		
		-	•	52,800	21,600	•						•
		I		10,000								
, ,	Accitoratio taccario cocco	ပ		3,500								
- - -	10.1 Assess current situation	0		8,400								
		F		21,900		•	•					
		I		6,400								
, ,	Recommend potential POPs	ပ		200								
7.0.	for management	0		2,400								
		H		9,300	•		•					•
		Ŧ		9,000	000'6							
200	Include those to the	ပ		5,400	5,400							
		0		7,200	7,200							
		<b>-</b>	•	21,600	21,600	•	•	•				•

H-Human costs C-Capital costs O-Operational costs T-Total costs

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#### 3.3.2 ACTION PLAN 2: MANAGEMENT OF POPS PESTICIDES

#### 3.3.2.1 Management activities

Based on the analysis of the country baseline situation, considering the provisions of the Stockholm Convention as well as other relevant international treaties and national policies, pursuant to the national priorities and objectives for POPs management, the following activity pathways were identified:

- 1.Improvement of pesticide regulatory system to adequately address the specific issues
- 2.Mechanism to minimise accumulation and safe disposal of outdated pesticides, at all levels
- 3.Development and implementation of proper information gathering and dissemination system
- 4. Monitoring and surveillance of environmental and human health effects

#### Research and Development

- 5.Study of possible correlation of environmental levels and adverse impacts
- 6. Study of environmental impact indicators
- 7. Fate and effects modelling

The proposed activities for realising the objectives are described in more detail in the following text. For each activity an explanatory text describes the rationale behind selecting the particular option as well as the expected capacity of the option to meet the Stockholm Convention requirements.

An implementation strategy table contains information on activities associated with the particular management activity, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

#### 3.3.2.2 Implementation strategy

# 1. Improvement of pesticide regulatory system to adequately address the specific issues

The Registrar of Pesticides is the national authority for implementing the laws and regulations under the Control of Pesticides Act No. 33 of 1980 and hence conformation to international conventions in relation to pesticides such as POP, PIC, etc. which would be carried out as a routine measure. With the strengthening of infrastructure, Sri Lanka would be able to effectively implement POP negotiations whichever tenable to present as well as candidate POP pesticides. An established working mechanism exists where pesticides are concerned under the specific HS coding system. Should any pesticide be prohibited for import unless with forged declarations, there is no possibility that they would pass through the Customs who work closely with the Registrar of Pesticides in regulating pesticide imports.

Table 12 (a): Improvement of pesticide regulatory system to adequately address the specific issues

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Improvement of pesticide regul	atory system	to adequately ac	dress the specific	issues
1.1	Banning	2007	Pesticide registration office/Customs and Import control	Gazette notification	adequate legal coverage for import control
1.2	Revision of HS codes classifications	2007	Pesticide registration office/Customs and Import control	Revised HS code subheadings	
1.3	Legal provisions for re-export of illegal consignments	2007	Env. Min./Exp.Imp. Controller, Customs	Legal provisions established	Responsibi lity held by the consignee/ shipping line
1.4	Regular monitoring of imports for chemical identity and POPs impurities	2008	Pesticide registration office/Customs	Monitoring of imports	

# 2. Mechanism to minimize accumulation and safe disposal of outdated pesticides, at all levels

The stocks of outdated POP pesticides are negligible and hence disposal is not a serious issue but large stocks of outdated non-organochlorine pesticides need immediate attention.

Table 12(b): Mechanism to minimize accumulation and safe disposal of outdated pesticides, at all levels

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Mechanism to minimize accu levels	mulation and	safe disposal c	of outdated pestic	ides, at all
2.1	Information gathering system establishment	2008	ROP/Pesticide Industry, Local authorities	System established	
2.2	Establishment of disposal management infrastructure	2009	ROP,Pesticide Industry, Local authorities	Infrastructure established	Relevance to Basel, risk assessme nt
2.3	Development of disposal facilities	2010	CEA/local authorities	Facility established	
2.4	Waste minimization program	2008-2009	CEA/ROP, Pesticide industry	Protocol established	

2.5	Export of out-dated pesticides	Upto 2009	ROP/CEA, Min	Export of	Basel,
	approved disposal sites		Env.,Imp.,	outdated	Stockholm
			Finance & Exp	pesticides	
			Control,		
			Customs,		
			pesticide		
			Industry		
2.6	Identification of alternative	Continuous	CEA/Min. Env.,	Availability of	Technologi
	disposal options		Industry	alternative	es and
				disposal options	local
					facilities

# 3. Development and implementation of proper information gathering and dissemination system

Although almost all POP pesticides were prohibited from use in Sri Lanka since a decade ago, environmental levels are still detectable at varied levels. Awareness on POP pesticides related issues, concerns and required remedial measures are alarmingly poor among most of the sectors of the society including scientific community.

Table 12(c): Development and implementation of proper information gathering and dissemination system

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Development and implementar system	tion of prop	er information ç	gathering and dis	semination
3.1	Establishment of a network mechanism among stakeholders centered at the ROP	2008	ROP, CEA, MoH, Universities, ITI, Others	System established	
3.2	Database development	2008	ROP	Database completed	
3.3	Development of a research partnership program	2008	ROP, CEA, MoH, Universities, ITI, NARA, Others	Research programs initiated	

#### 4. Monitoring and surveillance of environmental and human health effects

There is no planned monitoring system or infrastructure facility available with the pesticide registration authority to trigger remedial actions to mitigate the problems. So far no proper monitoring studies have been carried out on pesticides. Further, there is no surveillance system in place in the health sector to monitor the trends of health effects with respect to exposure to pesticides from environmental contamination. The data available in environmental concentrations are primarily produced for academic interests or data generated for export of agricultural commodities as a requirement from importing countries (residue levels) rather than for environmental or long-term monitoring purposes. This leads to rather discrete data coverage (spatial and temporal) which makes it difficult to evaluate significant trends of contamination by POP pesticides in the country.

Table 12(d): Monitoring and surveillance of environmental and human health effects

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4.	Monitoring and surveillance of	environmenta	al and human hea	alth effects	
4.1	Improvement of analytical capacity	2008-2011	ROP, MoH, CEA	Regular monitoring env. samples	
4.2	Assessment of environmental levels	Started by 2008	ITI/ROP, NARA, Univ.	Env. Levels reported	
4.3	Establishment and operation of a coordination body	2007	MoH/ ROP, ITI, Univ, CEA,MoE	Meeting Reports	
4.4	Surveillance system on potential health effects	2008	MoH/ ROP, MRI	Study reports	
4.5	Surveillance of possible environmental effects	Started by 2008		Study Reports	
4.6	Establishment of MRLs	2008	MoH/ ROP	Document on MRLs	
4.7	Monitoring of food for residues	2008	MoH/ ROP, ITI, Univ	Study Reports	

#### 3.3.2.2.1 Research and development on POPs pesticides

The proposed research and development actions are described in more detail in the following text. For each proposed R&D action an explanatory text describes the rationale behind selecting the particular option as well as its expected capacity to facilitate NIP implementation.

An implementation strategy table contains information on activities associated with the particular R&D action, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

### 5. Study of possible correlation of environmental levels and adverse impacts

Table 12(e): Study of possible correlation of environmental levels and adverse impacts

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
5.	Study of possible correlation o	f environmen	tal levels and ad	verse impacts	
5.1	Mapping of environmental levels	2008	ITI/ROP, CEA, MoE, Univ	Мар	
5.2	Survey of potential environmenta impacts	2009	MoE/ Research Institutes, ROP	Impact Reports	
5.3	Survey of potential health impacts	s 2009	MoH/MoE,	Impact Reports	Including
			Res. Institutes,		epidemiolo
			ROP, MRI		gical

					studies
5.4	Establishment of possible	From	ROP/MoE,	Report	
	correlations	2010	Res. Institutes,		
			MRI		

#### 6.Study of environmental impact indicators

#### Table 12(f): Study of environmental impact indicators

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
6.	Study of environmental impact	indicators			
6.1	Literature survey for potential indicators	2008	MoE/Res. Institutions, ROP, MRI	Survey Report	
6.2	Verification under different local conditions	2009- 2011	MoE/Res. Institutions, ROP, MRI	Indicators identified	
6.3	Field validation	2010- 2011	MoE/Res. Institutions, ROP, CEA, MRI	Indicators verified	

#### 7. Fate and effects modelling

#### Table 12(g): Fate and effects modeling

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
7.	Fate and effects modeling				
7.1	Literature survey for potential models	2008	MoE/Res. Institutions, ROP	Survey Report	
7.2	Verification under different local conditions	2009-2011	MoE/Res. Institutions, ROP	Models identified	
7.3	Field validation	2010-2011	MoE/Res. Institutions, ROP,CEA	Models verified	

# 3.3.2.3 Resource requirements

All costs are in US\$

2016	0	0	0	0				0				0				0				
2015	4,100	0	20,000	24,100				0				0				0	4,100	0	20,000	24,100
2014	4,100	0	20,000	24,100				0				0				0	4,100	0	20,000	24,100
2013	4,100	0	20,000	24,100				0				0				0	4,100	0	20,000	24,100
2012	4,100	10,000	20,000	34,100				0				0				0	4,100	10,000	20,000	34,100
2011	4,100	0	20,000	24,100				0				0				0	4,100	0	20,000	24,100
2010	4,100	0	20,000	24,100				0				0				0	4,100	0	20,000	24,100
2009	4,100	20,000	25,000	49,100				0				0				0	4,100	20,000	25,000	49,100
2008	7,200	35,000	21,960	64,160	1,300		1,360	2,660	006	0	300	1,200	006	0	300	1,200	4,100	35,000	20,000	29,100
2007	3,100	2,000	1,960	10,060	1,300	2,000	1,360	4,660	006	3,000	300	4,200	006	0	300	1,200				0
	I	U	0	<b>-</b>	I	C	0	<b>-</b>	I	U	0	F	I	J	0	⊢	I	C	0	F
	Improvement of	pesticide regulatory	system to adequately — address the	specific issues			1.1 Banning			Revision of HS	codes	cidosilicationis	Legal provisions	for re- export of	illegal	consignments	Regular	monitoring or imports for	chemical identity	and POPsimpurities
		-	•			,	<del>-</del>				7.				 				<u>4</u>	

All costs are in

			•						200			
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Mechanism to minimize	Ŧ	0	25,600	76,000	22,000	36,000	21,000	000′9	000'9	000′9	0
c	accumulation and safe	U	0	75,500	405,500	610,000	250,000	2,000	35,000	0	0	0
	disposal of outdated	0	0	9,200	39,200	29,400	23,600	28,600	3,600	3,600	3,600	0
	pesticides, at all levels	T	0	110,300	520,700	696,400	309,600	54,600	44,600	9,600	009'6	0
		Н		15,600	2,000	2,000	000′9	9000'9	000′9	000′9	000'9	
7	Information gathering system	С		62,000		20,000			35,000			
-	establishment	0		2,400	2,400	2,400	3,600	3,600	009'ε	3,600	3,600	
		-	0	80,000	7,400	27,400	009'6	9,600	44,600	9,600	9,600	0
		I			24,000	10,000						
c	Establishment of disposal	U			190,000	35,000						
7.7	management infrastructure	0			10,000	10,000						
		T	0	0	224,000	25,000	0	0	0	0	0	0
		Н				30,000	30,000	15,000				
c	Development of disposal	O				550,000	250,000	2,000				
2	facilities	0				15,000	20,000	25,000				
		T	0	0	0	595,000	300,000	45,000	0	0	0	0
		Ŧ		2,000	12,000	12,000						
7	Works minimization proper	O		10,000	12,000	2,000						
t	Waste IIIIIIIzauoi piografii	0		2,000	2,000	2,000						
		T	0	17,000	26,000	19,000	0	0	0	0	0	0
		Ŧ			30,000							
ر ر	Export of out-dated pesticides	C			200,000							
2	approved disposal sites	0			20,000							
		-	0	0	250,000	0	0	0	0	0	0	0
		т		2,000	2,000							
9	Identification of alternative	U		3,500	3,500							
2	disposal options	0		4,800	4,800							
		_	0	13,300	13,300	0	0	0	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Development and	т	0	12,400	11,600	3600	0	0	0	0	0	0
	implementation of	C	0	0 3,500	19,500	10,000	0	0	0	0	0	0
	proper information	0	0	10,800	10,800	4,800	0	0	0	0	0	0
3	gathering and dissemination system	Т	0	46,700	41,900	18,400	0	0	0	0	0	0
	Establishment of a	Н		4,000	2000							
	network mechanism	С		2,500	1,500							
3.1	3.1 among stakeholders	0		3,600	3,600							
	centred at the ROP		0	13,100	7,100	-	0	0	0	0	0	0
		Н		4,800	6,000							
		C		8,000	8,000							
3.2	3.2 Database development	0		2,400	2,400							
		⊥	0	15,200	16,400	-	0	0	0	0	0	0
	-	Н		3,600	3,600	3,600						
	Development of a	С		10,000	10,000	10,000						
3.3	research parmership	0		4,800	4,800	4,800						
	piograffi	⊢	0	18,400	18,400	18,400	0	0	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I	4,800	62,600	62,600	29,000	29,000	24,000	009'6	4800	4800	4800
_	Monitoring and surveillance	C	2,000	175,000	103,000	262,000	73,000	48,000	62,000	20000	12000	12000
t 	health effects	0	1,200	32,800	35,800	33,400	33,400	18,400	10,000	2000	2000	5000
		<b>-</b>	8000	270,400	201400	354400	165400	90400	81600	29800	21800	21800
		I		35,000	35,000	35,000 3	35,000					
7	Improvement of analytical	C		120,000	. 72,000	100,000	25,000					
4 -	capacity	0		12,000	15,000	15,000	15,000					
		_	0	167,000	75,000	150,000	75,000			0	0	0
		т		4,800	4,800	4,800	4,800	4,800	4,800			
7	Assessment of environmental	C		12,000	12,000	20,000	12,000	12,000	12,000			
‡ ¼	levels	0		2,000	2,000	2,000	2,000	2,000	5,000			
			0	21,800	21,800	29,800	21,800	21,800	21,800	0	0	0
		エ	4,800	4,800	4,800	4,800	4,800	4,800				
7	Establishment and operation of	C	2,000	3,000		2,000						
t 5	a coordination body	0	1,200	1,200	1,200	1,200	1,200	1,200				
		_	8,000	9,000	000'9	8,000	000'9	000'9		0	0	0
		I		4,800	4,800	4,800	4,800	4,800				
7	Surveillance system on	O		12,000	25,000	30,000	12,000	12,000				
<u>†</u>	potential health effects	0		3,600	3,600	3,600	3,600	3,600				
		⊢		20,400	33,400	38,400	20,400	20,400	0	0	0	0
		I		4,800	4,800	4,800	4,800	4,800				
7	Surveillance of possible	U		12,000	25,000	30,000	12,000	12,000				
; ;	environmental effects	0		3,600	3,600	3,600	3,600	3,600				
		_	0	20,400	33,400	38,400	20,400	20,400	0	0	0	0
		I		3,600	3,600							
7	Establishment of MDI c	C		4,000	4,000							
4 5		0		2,400	2,400							
		_	0	10,000	10,000	0	0	0	0	0	0	0
		I		4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800
7 7	Monitoring of food for recipiage	U		12,000	12,000	20,000	12,000	12,000	20,000	20,000	12,000	12,000
i i		0		2,000	2,000	2,000	2,000	2,000	5,000	2,000	2,000	5,000
		-	0	21,800	21,800	59,800	21,800	21,800	59,800	29,800	21,800	21,800

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2015	-	-	,	0				0				0				•
2014	-	_		0				0				0				•
2013				0				0				0				•
2012				0				0				0				•
2011	40,000	20,000	13,600	73,600				0	25,000	15,000	3,600	43,600	15,000	2,000	10,000	000
2010	35,000	20,000	13,600	68,600				0	20,000	15,000	3,600	38,600	15,000	2,000	10,000	000
2009	18,000	15,000	3,600	36,600				0	18,000	15,000	3,600	36,600				•
2008	3,000	1,000	2,000	000'9	3,000	1,000	2,000	000'9				0				c
2007	0	0	0	0				0				0				•
	Н	C	0	_	ェ	C	0	_	Н	C	0	-	ェ	C	0	٢
		R&D: Study of environmental	impact indicators			Literature survey for potential	indicators			Verification under different local	conditions			 	riela validation	
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			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		Н	-	-	3,000	20,000	40,000	40,000		-	-	ı
١	millopom otoogle base otoo . O oo	)		-	1,000	15,000	30,000	30,000		,	1	1
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		<b>-</b>		•	000'9	38,600	77,200	77,200			•	•
		Н			3,000							
7	Literature survey for potential	)			1,000							
-	models	0			2,000							
		⊥	•	•	000'9	•	•					
		I				20,000	20,000	20,000				
7	Verification under different local	С				15,000	15,000	15,000				
ź.	conditions	0				3,600	3,600	3,600				
		⊢			•	38,600	38,600	38,600			•	
		Н					20,000	20,000				
7		U					15,000	15,000				
G	רופום עמווממוטו	0					3,600	3,600				
		<b>-</b>	•	•	,		38,600	38,600	•	•	•	•

#### 3.3.3 ACTION PLAN 3: MANAGEMENT OF PCBS AND EQUIPMENT CONTAINING PCBS

#### 3.3.3.1 Management activities

Based on the analysis of the country baseline situation, considering the provisions of the Stockholm Convention as well as other relevant international treaties and national policies, pursuant to the national priorities and objectives for POPs management, the following management action pathways were identified:

- 1.Develop and put in place Legislation for PCB management
- 2. Establish full inventory of PCB containing equipment
- 3. Establish procedures for equipment maintenance
- 4. Establish appropriate PCBs analysis laboratory facilities
- 5.Establish and implement guidelines for phase out, transportation, storage and disposal of PCBs equipment
- 6. Establish progress monitoring mechanisms
- 7. Capacity building for control and management of PCBs
- 8. Disposal of existing stocks and stockpiles
- 9. Rehabilitation and decontamination of contaminated sites

#### Research and Development

- 10.R & D on treatment/elimination technologies
- 11.R & D on containment and decontamination of contaminated sites
- 12. Research for prevention of cross contamination
- 13. Research on health environmental effects due to exposure

The proposed actions for realising the objectives are described in more detail in the following text. For each option an explanatory text describes the rationale behind selecting the particular option as well as the expected capacity of the option to meet the Stockholm Convention requirements.

An implementation strategy table contains information on activities associated with the particular management option, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

#### 3.3.3.2 Implementation strategy

#### 1. Develop and put in place legislation for PCB management

In order to prevent new entry to the country, it is necessary to have the necessary regulatory framework in place. New entry is not only through importation. We have to establish guidelines wherever cross-contaminations could occur.

Importation can be avoided by implementing annexes for certain customs tariff numbers. Every legal import of transformers will be along 2 or 3 specific tariff numbers which are used internationally. If imports with such tariff numbers arrive the customs can ask for PCB free declarations from the manufacturer or ask for samples for verification of PCB content. Customs could use PCB-free inventory labels if equipment is confirmed as PCB-free.

Key requirement for further contaminations is PCB management. It will include all aspects related to equipment that might be PCB contaminated, such as sampling, labelling, analysing, maintenance operation, movements, transportation, storing and disposal. Unless tested as PCB-free each device that may contain or may be contaminated with PCB will be regarded as PCB. Three test burning experiments have been conducted for PCB destruction of transformer oils at a Cement Kiln here and this could be a positive development in PCB management.

Table 13(a): Develop and put in place Legislation for PCB management

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Develop and put in place Legis	slation for F	CB manageme	ent	
1.1	Amendment/formulation regulations to control PCBs(waste, non-waste contaminated equipment)	2007-2008	CEA ME,	Legislation in place	Contributin g activities undertake n for Basel Conventio n

#### 2. Establish full inventory of PCB containing equipment

To establish the full inventory on PCB contaminated equipment and to develop Action Plan based on this inventory. All PCBs containing equipment should be labelled.

Table 13(b): Establish full inventory of PCB containing equipment

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Establish full inventory of PC	B containin	g equipment		
2.1	Data collection	2007-2009	CEA,CEB,LEC O,LTL, private sector	Data collected	Existing data to be used as the
2.2	Formulation of database	2007-2009	CEA,CEB,LEC O,LTL, private sector	Complete database	baseline

#### 3. Establish procedures for equipment maintenance

Establish guidelines and procedures in order to prevent cross contamination of equipment during maintenance of equipment. Any kind of maintenance where people get into direct contact with PCB liquid should be strictly followed by specific protection clothing. If not absolutely necessary any "open" handling of PCB contaminated equipment should be avoided. The requirements will be specified by an expert team under participation of LTL, CEB, MENR and an international expert.

Table 13(c): Establish procedures for equipment maintenance

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Establish procedures for equipm	nent mainten	ance		
3.1	Establish a labeling procedure for identification	2007-2010	CEA,CEB,LEC O,LTL, private sector	All equipment labeled	Draft manual prepared
3.2	Establish maintenance procedure	2007-2009	CEA,CEB,LEC O,LTL, private sector	Manuals operational	by the TT6 could be used

#### 4. Establish appropriate PCB analytical laboratory facilities

Establish PCBs testing (screening tests) facilities to cover all provinces. Upgrading and accrediting existing laboratory facilities for PCBs analysis (including customs labs for compliance monitoring). Customs lab development should be considered a priority.

Several labs in the GOSL system can be developed as referral labs for the purpose of all related conventions – CEA / customs/ SLSI/ ROP. These could be backed up by ITI and University labs. The first layer directly supports the regulatory and monitoring purpose.

Table 13(d): Establish appropriate PCBs laboratory facilities

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4.	Establish appropriate PCBs labo	ratory faciliti	es		
4.1	Upgrade/accredit existing	2008-2011	ITI, CEB, CEA,	Laboratories	
	laboratories		Customs	accredited	
4.2	Establish testing facilities within	2008-2011	CEA,CEB,LEC	Testing facilities	
	stakeholder organizations		O,LTL, private	available within	
			sector	stakeholders	

# 5. Establish and implement guidelines for phase out, transportation, storage and disposal of PCBs equipment

To prevent haphazard disposal of decommissioned transformers guidelines will be established. The transformers and capacitors will be gradually phased out according to a Phasing out plan. This Phasing out plan will be elaborated on the base of the inventory of PCBs equipment according to the UNEP Guidelines.

Table 13(e): Establish and implement guidelines for phase out, transportation, storage and disposal of PCBs equipment

	disposal of 1 ODS equip				
	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
5.	Establish and implement guidel PCBs equipment	ines for phas	e out, transporta	tion, storage and	disposal of
5.1	Prepare guidelines for decommissioning	2007-2008	CEA, CEB, LTL, LECO	Guidelines	
5.2	Phasing out plan	2008-	CEA, CEB, LTL, LECO	Plan	
5.3	Implement the phasing out plan	2009-2016	ME, CEA, CEB, LTL, LECO	Stockholm Convention Commitment met	

Note: These guidelines are enforcing the regulation elaborated under item 2 of the AP on institutional and regulatory strengthening

#### 6. Establish progress monitoring mechanisms

Progress monitoring to ensure all the actions given in the PCBs equipment phasing out plan is implemented by the stakeholders.

Table 13(f): Establish progress monitoring mechanisms

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
6.	Establish progress monitoring	mechanisms			
6.1	Establish monitoring program	2008 -2016	ME, MPE, CEB, LECO, LT, Private Sector	Milestones in the program met	
6.2	Implementation of Monitoring System	2008	CEB, MPE, ME	Updated reports	
6.3	Action to fill Gaps	2008	CEB, MPE, ME	Reports	

#### 7. Capacity building for control and management of PCBs

Establish control and management task forces within stakeholder institutions, and upgrade their capabilities for management of PCBs. Particular emphasis should be put on safe handling of PCBs equipment, prevention of cross-contamination and procedures for identification and labelling of the PCBs equipment.

Table 13(g): Capacity building for control and management of PCBs

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues			
0	1	2	3	4	5			
7.	Capacity building for control and management of PCBs							
7.1	Establish teams within	2007-2011	ME,CEB,LECO	No of Task				
	stakeholder institutions		,LTL, private	Teams and				

			sector	Coverage	
7.	2 Training and capacity building program	2008-2011-	ME,CEB,LECO ,LTL, private sector	Report on no. Of capacity building programs conducted and steps taken for PCB	Stakehold er capacity building programs
				management	

Note: this item is included also in the AP on awareness raising

#### 8. Disposal of existing stocks and stockpiles

Action to be taken for disposal of existing stocks identified as PCB contaminated using best available technologies in Sri Lanka. While activities are enumerated upto 2016, a review of PCB Stock will be made in 2015 after which further actions as necessary will be in taken.

Table 13(h): Elimination of existing stocks and stockpiles

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
8.	Elimination of existing stocks ar	nd stockpiles			
8.1	Evaluation of the capability of existing facilities for disposal	2007-2008	CEA, CEB,LECO,LTL	Suitable facility identified	
8.2	Recommending improvement	2008	CEA	Recommendatio ns/guidelines developed	
8.3	Disposal of existing stocks	2007-2016	ME,CEB, LECO, LTL	Existing Stocks Disposed	

#### 9. Rehabilitation and decontamination of contaminated sites

It is necessary to identify existing polluted sites, and take steps to decontaminate and rehabilitate those using appropriate technologies.

Table 13(i): Rehabilitation and decontamination of contaminated sites

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
9.	Rehabilitation and decontamina	ation of conta	minated sites		
9.1	Inventory of contaminated sites	2008-2009	Stakeholders	Inventory	
9.2	Identify feasible decontamination/rehab methods	2009	Stakeholders	Feasibility Report	
9.3	Decontamination and rehabilitation	2010-2015	Stakeholders	% of decontaminated sites	

#### 3.3.3.2.1 Research and development

Based on the identified national priorities and objectives for POPs management, as well as the selected management options, the following research and development actions were identified to facilitate the NIP implementation under the PCB action plan.

The proposed research and development actions are described in more detail in the following text. For each proposed R&D action an explanatory text describes the rationale behind selecting the particular option as well as its expected capacity to facilitate NIP implementation.

An implementation strategy table contains information on activities associated with the particular R&D action, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

#### 10. R&D on treatment / elimination technologies

Based on BAT and BEP for Sri Lanka, it is necessary to identify suitable final disposal options for PCBs in Sri Lanka

Table 13 (j): R&D on treatment / elimination technologies

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
10.	R&D on treatment / elimination	technologie	s		
10.1	Introduce to universities as a	2008-2009	ME, MPE,	Suitable	
	research priority		Universities,	technology	
			MST, CEB	suggestions	
10.2	Promote stakeholders to initiate	2008	ME,	Same as above	
	R&D		Stakeholders		

#### 11. R&D on containment and decontamination of contaminated sites

Contaminated sites should be identified and inventorized. Steps should be taken for decontamination of decontaminated sites

Table 13 (k): R&D on containment and decontamination of contaminated sites

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
11	R&D on containment and decon	tamination o	f contaminated s	ites	
11.1	Survey on contaminated sites	2009	Stakeholders, R&D institutions, MPE	Survey completed and inventory in place	
11.2	Introduce to universities as a research priority	2008-2009	MPE, Stakeholders, R&D	Research priorities identified	
11.3	Promote stakeholders to initiate R&D	2009	MPE, Stakeholders,R &D	Mechanism for R&D implemented	

#### 12. Research for prevention of cross contamination

R&D should be carried out to investigate causes for cross contamination in different provinces and for prevention of cross contamination

Table 13(I): Research for prevention of cross contamination

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
12	Research for prevention of cro	ss contamin	ation		
12.1	Survey for identification of reasons for cross contamination	2008-2010	MPE, Universities, industries	Reasons for cross contamination identified	
12.2	Procedures developed for prevention of cross contamination	2010	CEB, LECO, LTL, Universities	Procedures developed	

#### 13. Research on health and environmental effects due to exposure

Conducting research and surveys on health and environmental effects due to exposure for PCBs in Sri Lanka

Table 13(m): Research on health and environmental effects due to exposure

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
13	Research on health and enviro	nmental effe	cts due to expos	ure	
13.1	Formulate a program on research on above	2008	MoH, MRI, ME stakeholders	Program developed	
13.2	Implement the programme	2008-2011	MoH, MRI	12 programs implemented per year	

# 3.3.3.3 Resource Requirements

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I	3,200	3,200		1	1		0	0	0	0
_	Develop and Put in Place	ပ	1,400	1,400		1	1		0	0	0	0
_	Legislation for PCB management	0	000'6	000,6		-			0	0	0	0
		-	13,600	13,600				•	0	0	0	0
	Amendment/formulation of	I	3,200	3,200								
-	regulations to control PCBs (waste,	ပ	1,400	1,400								
	non-waste, contaminated	0	000'6	000,6								
	equipment)	⊢	13,600	13,600					0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I	12,200	15,000	15,000				0	0	0	0
·	Establishment of a full inventory	C	8,400	2,500	2,000	-	-	-	0	0	0	0
4	on PCBs equipment	0	6,250	6,250	6,750	-	-	-	0	0	0	0
		T	26,850	26,750	23,750	•	•	-	0	0	0	0
		I	9,300	9,300	9,300							
,	20,100	ပ	4,000	4,500	1,000							
, ,	טמים כסופכנים	0	5,250	5,250	5,250							
		-	18,550	19,050	15,550	•		•	0	0	0	0
		I	2,900	5,700	5,700							
c	Control of a dotal	ပ	4,400	1,000	1,000							
7:7	רטוווומומוטון טו מ ממומטמאפ	0	1,000	1,000	1,500							
		⊢	8300	7700	8200	0	0	0	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		I		12,800	12,800	12,800	1	-	-	0	0	0
,	Establish procedures for	၁		4,000	2,000	2,000	-	-	-	0	0	0
2	equipment maintenance	0		10,000	10,000	000'6	-	-	-	0	0	0
		T		26,800	24,800	23,800	-	•	-	0	0	0
		н		6,400	6,400	6,400						
,	Establish a labeling procedure for	C		2,000	2,000	2,000						
-	identification	0		5,000	5,000	4,000						
		-		13,400	13,400	12,400			•	0	0	0
		I		6,400	6,400	6,400						
,	Coto Constaint maintaint	ပ		2,000	2,000							
S 7.	Establish Halliterlance procedure	0		5,000	5,000	5,000						
		_		13400	13400	11400	0	0	0	0	0	0

All costs are in US\$

		Establish appropriate PCB	analysis Laboratory Facilities			Upgrade and accredit existing	laboratories			Establish testing facilities within	stakeholder organisations	
		PCB	cilities			xisting				s within	ions	
	ェ	ပ	0	_	I	C	0	_	н	ပ	0	<b>⊢</b>
2007				•				•				•
2008	43,000	70,000	16,000	129,000	25,000	10,000	10,000	45,000	18,000	000'09	6,000	84,000
2009	31,000	75,000	22,000	128,000	25,000	15,000	10,000	50,000	000'9	000'09	12,000	78,000
2010	32,000	000'08	20,000	132,000	25,000			25,000	7,000	000'09	10,000	77,000
2011	-	-	-	•				•				•
2012	-	-	-	•				•				•
2013	-	-	-	•				•				•
2014		•	-					•				•
2015	-	-	-					•				•
2016	-	-		-				•				•

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Establish and implement	I	4,800	36,800	18,400	6,400	6,400	6,400	6,400	6,400	6,400	6,400
Ц	guidelines for phase out, storage	ပ	3,000	5,000	12,000	12,000	4,000	4,000	4,000	4,000	4,000	4,000
0	transportation and disposal of	0	3,600	7,200	4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800
	PCB equipment	<b>–</b>	11,400	49,000	35,200	23,200	15,200	15,200	15,200	15,200	15,200	15,200
		I	4,800	16,800								
4	Prepare guidelines for	ပ	3,000	1,000								
	decommissioning	0	3,600	3,600								
		<b>-</b>	11,400	21,400		•		•		•	•	
		I		20,000								
0	200000	ပ		4,000								
7.	rilasilig out piali	0		3,600								
		<b>-</b>		27,600							-	
		I			18,400	6,400	6,400	6,400	6,400	6,400	6,400	6,400
7	acla tuo saisonda odt taomolami	ပ			12,000	12,000	4,000	4,000	4,000	4,000	4,000	4,000
o.	Implement the phasmy out plan	0			4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800
		_	•	•	35.200	23.200	15.200	15.200	15.200	15.200	15.200	15.200

		1000	0000	0000	0700	77.00	0,00	0700	,,,,,	1,00	0,00
		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	エ	_	6,400	6,400	6,400	6,400	6,400	6,400	6,400	6,400	6,400
Establish progress monitoring	ပ	-	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000
	0	-	4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800
	_	•	15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200
	I		6,400	6,400	6,400	6,400	6,400	6,400	6,400	6,400	6,400
	ပ		4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000
Establish monitoling programme	0		4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800
	<b>-</b>		15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200	15,200
									All costs	are in US\$	
		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	I	4,800	16,800	15,000	5,000	1,000	-	0	0	0	0
Capacity building for control and	ပ	6,400	18,400	15,000	5,000	1,000	1	0	0	0	0
management of PCBs	0	2,400	8,800	6,400	6,400	6,400	1	0	0	0	0
	<b>-</b>	13,600	44,000	36,400	16,400	8,400		0	0	0	0
	т	4,800	4,800								
Establish teams within stakeholder	ပ	6,400	6,400								
	0	2,400	2,400								
	<b>-</b>	13,600	13,600				0	0	0	0	0
	I		6,400	6,400	6,400	6,400					
Training and capacity building	ပ		12,000	15,000	5,000	1,000					
	0		6,400	6,400	6,400	6,400					
	⊢		18,400	21,400	11,400	7,400	•	0	0	0	0
									All costs	are in US\$	
		2007	2008	2009	2010	2011	2012	2013		2015	2016
	I		18,600	12,000	12,000	6,400	6,400	6,400	6,400	6,400	6,400
Disposal Of stocks and	ပ		28,800	125,000	250,000	12,000	12,000	12,000	12,000	12,000	12,000
	0		103,600	200,000	400,000	400,000	200,000	200,000	100,000	100,000	250,000
	F		151,000	337,000	662,000	418,400	218,400	218,400	118,400	118,400	268,400
	Ŧ		3,600								
Evaluation of the capability of	၁		4,800								
existing facilities for disposal	0		3,600								
	<b>-</b>		12,000		•		•	•	•		
	I		15,000	12,000	12,000	6,400	6,400	6,400	6,400	6,400	6,400
	ပ		24,000	125,000	250,000	12,000	12,000	12,000	12,000	12,000	12,000
	0		100,000	200,000	400,000	400,000	200,000	200,000	100,000	100,000	250,000
	-	•	120 000	227 000	000	007	070	001			

										All costs a	All costs are in US\$	
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	100 00 00 00 00 00 00 00 00 00 00 00 00	I	-	009'6	34,600	36,000	24,000	24,000	-	-	0	0
c	Renabilitation and	ပ	-	10,000	13,500	20,000	25,000	48,000	1	1	0	0
n	decontamination of	0	-	30,000	55,000	12,000	36,000	36,000			0	0
	collianillated sites	_		49,600	103,100	68,000	85,000	108,000			0	0
		I		009'6	009'6							
2	sotio botonimotaco to vactacival	ပ		10,000	10,000							
	Illveritory of contaminated sites	0		30,000	30,000							
		_	•	49,600	49,600		•	•		•	0	0
	داطان دواء بقائمه داما	I			25,000							
c	doontomination/rababilitation	ပ			3,500							
9 7	decontaniinanoi Menabiinanoi	0			25,000							
	000000000000000000000000000000000000000	_		•	53,500	•	-	•	•		0	0
		エ				36,000	24,000	24,000				
Ċ	Decontamination and	၁				20,000	25,000	48,000				
	rehabilitation	0				12,000	36,000	36,000				
		_		•		68,000	85,000	108,000				0

H-Human costs C-Capital costs O-Operational costs T-Total costs

										All costs a	All costs are in US\$	
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		エ	-	16,800	8,400	-	-	-	-	-	0	0
5	R&D on treatment / elimination	ပ	-	2,000	1,000	-	-	-	-	-	0	0
2	technologies	0	1	24,000	6,400						0	0
		_	-	42,800	15,800	-	-	-	-	•	0	0
		I		8,400	8,400							
,	Introduce to universities as	ပ		1,000	1,000							
-	research priority	0		12,000	6,400							
		_	•	21,400	15,800	•	•	•	•	•	0	0
		I		8,400								
,	Promote stakeholders to initiate	၁		1,000								
	R&D	0		12,000								
		_	•	21,400					•		0	0

										All costs are in US\$	re in US\$		
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
		Н	0	18000	26400	0	0	0	0	0	0	0	
7	Acontamination of	0	0	11000	12000	0	0	0	0	0	0	0	
=	contaminated eitee	0	0	0099	11500	0	0	0	0	0	0	0	
	collialillated sites	_	0	34500	49900	0	0	0	0	0	0	0	
		I		009'6	009'6								
7	Sofia botonimotado ao volan S	2		10,000	10,000								
=	Survey off confamiliated sites	0		2,500	2,500								
		⊢	0	22100	22100	0	0	0	0	0	0	0	
		н		8,400	8,400								
	Introduce to universities as	၁		1,000	1,000								
4	research priority	0		3,000	3,000								
		L	0	12400	12400	0	0	0	0	0	0	0	
		Н			8,400								
7	Promote stakeholders to initiate	2			1,000								
	R&D	0			6,000								
		⊢	0	0	15400	0	0	0	0	0	0	0	

										All costs a	All costs are in US\$		
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
		I	1	6,400	6,400	11,200	1	1	1	1	0	0	
ć	R&D Research for prevention of	ပ	1	12,000	5,000	16,000	1	1	1	1	0	0	
7	cross-contamination	0	1	3,600	3,600	8,400	1	1	1	1	0	0	
		_		22,000	15,000	35,600					0	0	
		I		6,400	6,400	6,400							
, ,	Survey for identifiction of reasons	ပ		12,000	5,000	12,000							
- 7		0		3,600	3,600	3,600							
		_		22,000	15,000	22,000					0	0	
		I				4,800							
40,0	Develop procedures for	ပ				4,000							
7.7	prevention of cross-contamination	0				4,800							
		۲				003 67					c	c	

										All costs a	All costs are in US\$	
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	14 00 d d d d d d d d d d d d d d d d d d	I	0	21,600	13,200	13,200	13,200	0	0	0	0	0
5	Control of officer due to	ပ	0	39,500	36,000	36,000	36,000	0	0	0	0	0
2		0	0	18,400	12,000	15,000	15,000	0	0	0	0	0
	amsodya	⊢	0	79,500	61,200	64,200	64,200	0	0	0	0	0
		エ		8,400								
6.	Formulate a program on research	ပ		3,500								
	on the above	0		6,400								
		<b>-</b>	0	18,300		•		0	0	0	0	0
		I		13,200	13,200	13,200	13,200					
40,0	+ + + + + + + + + + + + + + + + + + +	ပ		36,000	36,000	36,000	36,000					
7.0		0		12,000	12,000	15,000	15,000					
		-	0	61,200	61,200	64.200	64.200	0	0	0	0	0

H-Human costs C-Capital costs O-Operational costs T-Total costs

# 3.3.4 ACTION PLAN 4: MANAGEMENT OF UNINTENTIONALLY PRODUCED POPS BY-PRODUCTS

The main sources of releases of PCDD/F in Sri Lanka were identified as: the uncontrolled combustion of wastes, primarily in dumps and in the open, the processing of metals, in particular scrap copper where a significant amount of PCDD/F is likely to be associated with the residues from gas cleaning systems, the incineration of medical wastes which is largely carried out under very poorly controlled conditions, burning of biomass in homes for cooking, industry and for disposal of agricultural residues.

Estimates of releases to air and residues were far greater than for releases to water, land or in products. This reflects both the nature of the main sources (thermal processes giving air emissions and residues from gas cleaning and combustion) and a lack of data to estimate releases to other media.

### 3.3.4.1 Management activities

The following management activity pathways were identified based on the analysis of the country baseline situation, considering the provisions of the Stockholm Convention as well as other relevant international treaties and national policies, and pursuant to the national priorities and objectives for POPs management. Application of cleaner production concepts and practices in all these management options/activities has been recommended at all levels in line with the National Cleaner Production Policy and Strategy.

- 1. Incorporate into legislation BAT/BEP requirement for new sources
- 2. Review & upgrade relevant legislation/s on solid waste management
- 3. Implement proper solid waste management/disposal mechanism
- 4. Implement proper medical wastes management disposal mechanisms.
- 5. Review existing technology on secondary metal recycling plants, including traditional industries, and identify necessary changes for upgrading these systems
- 6. Review existing crematoria designs for their acceptance and identify changes

#### Research and Development

- 7. Development of emission factor for production of charcoal (Coconut shell) under different process conditions.
- 8. Investigate unintentional by products & AOX in leachate and soil in the contaminated open dump sites (eg.Bloemendhal)
- 9. Investigation of contamination of animal milk and human milk in the scavenging animals and people living close vicinity to the dump sites
- Research on recycling potential for flammable material (plastics/Polymers)
- 11. Assessment of unintentional by products in process sludge / air emission and treatment of sludge in BOI plants & traditional secondary smelting plants
- 12. Assessment of unintentional by products in the soil contaminated from the wastewater and sludge releases from service stations

- 13. Life cycle assessment of PVC materials used
- 14. Risk assessment on use of biomass for cooking

## 3.3.4.2 Implementation strategy

### 1. Incorporate into legislation BAT/BEP requirement for new sources

Sri Lanka does not have legislation for controlling PCDD/PCDF emissions. Further, the need of using BAT/BEP requirements into PCDD/PCDF generating sources is not a legal requirement in the country. The only legislative requirement is the need of incorporating technical devices for controlling parameters listed in the ambient air quality standards. These parameters include only CO, NO<sub>2</sub>, SO<sub>2</sub>, O<sub>3</sub>, Pb and SPM. The use of relevant technical devices may help in reducing PCDD/PCDF as well. However, there is a need to further reduce these levels, as the legal limits those have been stipulated for PCDD/PCDF in other countries are very low (nanogram levels). Therefore, it is essential to introduce BAT/BEP to the new sources, and to the existing sources with an extended period of compliance (e.g. within 10 years), in order to reduce PCDD/PCDF emissions.

Introduction of BAT/BEP will also not create the need of testing for PCDD/PCDF on a regular basis for which highly expensive and highly sophisticated techniques are required. Hence, the necessity of implementing BAT/BEP in PCDD/PCDF sources will not be only technically feasible but also be economically advantageous.

Table 14(a): Incorporate into legislation BAT/BEP requirement for new sources

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	_Incorporate into legislation BAT	BEP require	ment for new sou	ırces	
1.1	Carry out a survey on existing sources (with special emphasis on medical wastes incineration and secondary metal melting plants including traditional industries ) and identify the shortcomings	2007	CEA, ME, , MLG, ITI & BOI NERD, MI (IDB)	_	
1.2	Identify the BAT/BEP requirements	2007	CEA ME, , ITI & BOI, NERDC, MI	Report on the need of BAT/BEP requirements	
1.3	Drafting Regulations	2008	-do-	Draft Regulations	
1.4	Approvals	2008	-do-	Approved Regulations	
1.5	Gazette the Regulations	2008	-do-	Gazzetted Regulations	
1.6	Monitor implementation	2009	-do-	Establishment of new sources with BAT/BEP requirements.	

### 2. Review & upgrade relevant legislation/s on solid waste management

Management of solid wastes by legislation is addressed only in the Local Authority Regulations and as per the said Regulations the sole responsibility of managing solid wastes has to be borne by the relevant Local Authorities. However, with the rapid development in the past, presently there is a huge generation of wastes of heterogeneous composition specially comprising non-degradable waste such as polythene. Particularly hazardous is the common practice of uncontrolled burning of wastes. With the existing legal mechanism, the Local Authorities alone are unable to manage such wastes and therefore they need further strengthening their capacity to handle solid waste in an environmentally sound manner.. This can be achieved by reviewing and upgrading the present legislation. Prohibition of open burning of wastes at least in the urban area will be considered.

Table 14(b): Review & upgrade relevant legislation/s on solid waste management

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Review & upgrade relevant legis				
2.1	Review existing legislation in Sri Lanka for solid wastes management	2007	CEA, ME, MLG *Legal Draftsman Dept.	Draft Report on the existing legislation for the management of solid waste.	
2.2	Compare 2.1 above with the legislative provisions of other signatory countries specially with reference to minimizing PCDD/PCDF (this may be the BAT/BEP – omission of this may be considered)	2007	-do-	Report on comparison with identified gaps.	
2.3	Upgrade/amend existing legislation by incorporating findings in 2.2 above	2008	-do-		
2.4	Summarise outcome of 2.3 above into a common structure clearly defining the responsible Stakeholders.		-do-		
2.5	Draft amended Regulations	2009	-do-	Draft of amended Regulations	
2.6	Approvals	2009	-do-		
2.7		2009	-do-		
2.8	Monitor implementation-( Implementation of regulations should handle by the management Group)	2009 onwards	-do-	Solid wastes reaching disposal sites will be easy to manage	

### 3. Implement of proper solid waste management/disposal mechanisms

In addition to the above-mentioned shortcomings in the legal mechanism, Sri Lanka has no real implementation experience with proper solid wastes management/disposal mechanisms. Haphazard disposal practises have lead to severe environmental degradation not only by way of PCDD/PCDF but by other pollutants as well. These improper disposal practises have lead to depreciation of

aesthetic value too, at the vicinity of disposal sites. Further, the PCDD/PCDF inventory has revealed that fires at dump site are the biggest contributors for PCDD/PCDF emissions in Sri Lanka by way of air (57% of total air emissions). Even though the total TEQ for leakages has not been carried out due to the lack of information the highly contaminated leachate may posses high value of TEQ and these also leached out from the dumping sites.

Hence, implementation of proper solid waste management/disposal mechanisms is an urgent need of the country.

Table 14(c):Implement of proper solid waste management/disposal mechanisms

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Implement of proper solid waste				
3.1	Identification of a co-ordination mechanism which is acceptable to all stakeholders	2007	<b>ME</b> ,MLG, MoH,	Report on the Existing co- ordination mechanism for solid waste management Report & Action plan	FP- ME&NR
3.2	Carry out a situation analysis with regard to existing solid waste management systems	2007	ME,MLG, MOH, CEA	Report on the Situation analysis of Solid waste management System in Sri Lanka	
3.3	Prepare guidelines for waste management and disposal in accordance with BAT & BEP	2008	ME, MLG, MoH	Report & Action plan	FP- ME&NR
3.4	Identify weaknesses of implementation of 3Rs and waste prevention measures	2008 If BAT & BEP to be decided.	ME,MLG, CEA, WMA, LA Bol, ITI, M/Industries and Project SMED, NCPC	Report & Action Paln	FP- ME&MR
3.5	Identification of feasible and practicable disposal options	2007	ME,MLG, CEA,SMET, WMA,LA Bol, ITI, NCPC	Report & action Plan	
3.6	Identification of necessary technical & financial resources to local authorities	2007	Treasury, ME , MLG, CEA	Report & Action plan	
3.7	Implementation of proper solid waste disposal technology/ies in selected local Authority Areas	2007	<b>ME</b> ,CEA. MLG, Foreign funding Agency	waste management/dis posal mechanisms in selected local Authority areas	
3.7	Creation of general awareness on SWM	On going	MLG,CEA, WMA,LA Bol,	Reduction of quantity of waste	

per inhabitant, Changes in
behavior pattern
with regard to
waste disposal.
Increase of
waste recycling
facilities.

### 4. Implement of proper medical wastes management/disposal mechanisms

In Sri Lanka medical wastes are mainly disposed of by landfilling/uncontrolled burning – usually managed with other solid waste without any differentiation. Although segregation of wastes is practiced to a certain extent, this is not implemented at a satisfactory level due to lack of a proper management mechanism.

With regard to medical wastes incineration, there is only one such incinerator that is being operated by a private hospital. Although it is incorporated with the relevant temperature control devices, whether the necessary temperature levels are maintained in real practise is ambiguous.

There are number of small-scale burning chambers operated in several hospitals without any gas cleaning systems. Their burning practises are similar to burning of solid waste in the open air. In almost all cases, solid wastes are burnt without any segregation and this leads to emission of PCDD/PCDF.

As per the inventory, after fires at dump site, burning of medical wastes is the second biggest contributor for PCDD/PCDF emissions in Sri Lanka by way of air. Hence, implementation of proper medical wastes management/disposal mechanisms is an urgent need of the country.

Table 14(d): Implement of proper medical wastes management/disposal mechanisms.

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
		2	3	4	5
4	Implement of proper medical wa	stes manage	<u>-</u>	echanisms.	
4	1 Review of existing medical wastes management/disposal techniques	2007	MOH, ME, CEA & ITI, BOI	Report on the existing practices of management of Hospital Wastes	There are several studies carried out by the Ministry of health. By re-viewing these reports a fresh report can be prepared
4	relevant improvements/ technologies. Identify a mechanism for implementing these technologies	2007	-do-	Report /Activity plan	·
4	Implement above. Report/ Activity plan in selected hospitals in all districts as a pilot	2007	-do-	Number: of Improved medical wastes	

	/demonstration project			managment practises	
4.4	Monitoring of Implementation of	2007/8	CEA, BOI, Local	Number of	
	Report/ Activity plan		Authorities	hospitals adhere	
	·			to the BAT/BEP	

### Review existing technology on secondary metal recycling plants including traditional industries and identify necessary changes for upgrading these systems

With respect to Air Pollution Control (APC), there are two main categories of secondary metal recycling plants in Sri Lanka. These are; (a) those operate without any APC devices and run on a cottage scale. (b) those operate with APC (wet scrubber devices) and run on an industrial scale.

The inventory has revealed that PCDD/PCDF contamination with respect to via residue, the residue generated from secondary metal recycling makes the biggest contribution (62% of total residue contamination).

Hence, implementation of proper technology capable of minimising contamination by residue and air emissions too, is an essential need of the country.

#### 5(a) Cottage scale metal recycling plants

Table 14(e): Review existing technology on secondary metal recycling plants including traditional industries and identify necessary changes for upgrading these systems

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
5a.	Review existing technology of				traditional
	industries and identify necessa				
5.1a	Review the existing technologies of traditional secondary smelting plants for improvements	2007	ITI,UoM,UoP,N ERD, CEA,BoI,IDB, SMED	Report on the Existing technology in the Secondary metal cottage industries	
5.2a	Identify the required improvements/technologies and inclusive of BAT/BEP	2007	ITI, NERD, CEA, BOI, IDB & SMED	Report on the applicability and improvement of existing technology	
5.3a	Identify a mechanism for implementing above 5.2a	2007	ME, consultation with above	Action plan	
5.4a	Implementation of Action plan	2007	ITI,NERD, CEA, BOI, IDB & SMED	Number of facilities improved	
5.4a	Monitoring of implementation of Action plan	2007	<b>CEA</b> ,Local Authority	Number of cottage scale industries operating according to the guidelines increase	

### 5 (b) Industrial scale metal recycling plants

Table 14(f): Review existing technology on secondary metal recycling plants including traditional industries and identify necessary changes for upgrading these systems

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
5b.	Review existing technology of				traditional
	industries and identify necessa	ry changes f	or upgrading the	se systems	
5.1b	Control of importation of recyclable material	2007	Customs, DoIC,ME, CEA,BoI & PA	Ensure purity of metals imported, prohibit highly contaminated metals	
5.2b	Computerize importation of secondary metals and monitor them along with resulting exports (mass balancing checks)	On going	Customs & BOI	Data on imports and resulting exports as well	
5.3b	Review existing technologies of the scrap metal recycling plants and identify the possible BAT/BEP	2007	ITI,UoM,UoP,N ERD, CEA,BoI,IDB	Report on the existing practice of BAT/BEP	
5.4b	Implement the suitable BAT/BEP in any identified sources in 5.3b above	2007	ITI,BOI & CEA	Number of Industrial metal recycling plants with BAT/BEP	

### 6. Review existing crematoria designs for its acceptance and identify changes

In Sri Lanka crematoria are designed without due consideration to appropriate temperature controls. Some are over a century old and were constructed during the colonial period. Cremation of deceased is quite common among Buddhists and Hindus. Approximately 65 Crematoria exist while some pyres are made of wood close to funeral homes by tradition. No air cleaning or pollution control systems are adopted in these crematoria which are with single chamber with no after burning systems incorporated.. The stack height is designed to provide enough dilution only.

As there is no proper temperature controlling mechanism, temperatures can exist in the range favourable for PCDD/PCDF formation during burning activities. Emission factor to air is estimated to be 90 ug I-TEQ per Cremation. Hence, reviewing crematoria designs with respect to temperature controls and finding out the relevant BAT/BEP is a need to minimise PCDD/PCDF emissions.

Table 14(g): Review existing crematories designs for its acceptance and identify changes

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
6.	Review existing crematories des	ions for its a	ceptance and id	entify changes	

	·				
6.1	Review of existing crematoria	2007	MLG and ITI	Status Report	
	designs and identify shortcomings				
	with respect to temperature				
	controls and thereby the required				
	BAT/BAP				
6.2	Identify measures to improve	2007	-do-	Action Plan	
	shortcomings				
6.3	Secure endorsement of	2008	Local	Number of	
	stakeholders and Implement the		Authorities,	Upgraded	
	Action Plan		Provincial	crematoria	
			Councils, MLG,		
			CEA and, ME		
6.4	Monitoring of implementation of	2008	CEA, ME, &	Number of	
	Action plan		MLG	Crematoria in	
	'			operation adhere	
				to the Action	
				Plan	
6.5	Secure technical assistance and	2008	M/Industries.	1 1011	
0.0	technology transfer		MENR		
	toolinology transiti		IVI - I VI V		

### 3.3.4.2.1 Research and development

The proposed research and development actions are described in more detail in the following text. For each proposed R&D action an explanatory text describes the rationale behind selecting the particular option as well as its expected capacity to facilitate NIP implementation.

An implementation strategy table contains information on activities associated with the particular R&D action, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the Resource requirements human, capital and related operation costs of the identified activities are described, considering the established timeline.

# 7. Development of an emission factor for charcoal production (Coconut shell) under different process condition.

Coconut is one of the major plantation crops in Sri Lanka. Each and every part of the tree has a commercial value. Coconut shells are burnt in open pits in huge quantities for manufacture of charcoal. During burning of coconut shells a dense smoke is emitted and it is likely to contain a high content of volatile organic substances, particulate matter and other air pollutants. Out of these, some constituents may be contaminated with carcinogenic substances including PCDD/PCDF.

Further, as the growth of coconut flourishes in the coastal belt, its shells can contain a high chloride content. Hence, burning shells can lead to produce high levels of PCDD/PCDF.

However, the toolkit has not identified coconut shell burning as a PCDD/PCDF generating source although other types of biomass burning operations are included in it. Hence, a TEQ value for burning of charcoal is not included in the inventory. Therefore, it will be necessary to develop an emission factor for coconut shell burning as well, as it has a potential to release PCDD/PCDF due to the abovementioned reasons. Development of an emission factor will enable other coconut growing countries too, to adopt same factor during preparation of their PCDD/PCDF inventory. A review of existing local technology being used for Charcoal Production will be useful.

Table 14(h): Development of an emission factor for charcoal production (Coconut shell) under different process condition.

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
7.	Development of an emission factorized process condition	ctor for charce	oal production (C	oconut shell) und	er different
7.1	A survey of charcoal production	2007	CEA, ISB, CRI,	Action	
	sites and selection of		BOI &	plan/Activity Plan	
	representative sampling		ITI,NWPEA,		
	locations				
7.2	Carry out sampling with special	2007	-do- with	Analytical Report	
	reference to residue, products &		international	on the emission	
	air		expert and	of PCDD/PCDF	
			assistance	in charcoal	
				production	
7.3	Organise testing of above 1.2 for	2007	-do-, with		
	PCDD/PCDF (1.2 and 1.3 may		overseas		
	combined together)		technical		
			support		
7.4	Compute the emission factor	2007	-do-	Emission factor	
	based on output of above 1.3			for the charcoal	
				production	

# 8. Investigate unintentional by products & AOX in leachate and soil in the contaminated open dump sites

In Sri Lanka "Colombo" is the major city with a complex mixture of residential, commercial and industrial activities. Hence, the solid waste generated is of heterogeneous in composition mainly comprising flammable and biodegradable material. A recent survey has revealed approximately 650 t is generated per day.

This waste is haphazardly disposed of directly on a block of land located within Colombo city (Bloemendhal). This site does not have the basic environmental pollution control devices such as facilities for controlling fires, leachate collection & treatment etc.

Therefore, this site is being operated without basic facilities although a complex waste mixture is contained. There are frequent occurrence of fires which sometimes exist for weeks. These uncontrolled fires emit major types of pollutants into the environment. Apart form the fires, the leachate from the dump site is also considered as a major environmental issue. Hence, contamination of the site and its vicinity with PCDD/PCDF and AOX is also expected.

However, no investigations have been so far carried out with respect to these substances in leachate and soil. Hence, analysis of leachate and soil for PCDD/PCDF and AOX levels will enable to understand the extent the site has been contaminated and thereby the necessary BAT/BEP requirements to control/minimise such contamination. Further, these results can be utilised as a criteria (baseline data) in assessing the effectiveness of BAT/BEP at landfill sites. In addition, these test results also help to assess the situation in other similar dump sites located in other places in the country.

Table 14(i): Investigate unintentional by products & AOX in leachate and soil in the contaminated open dump sites in Colombo, Kandy, Nuwareliya etc

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
8	Investigate unintentional by produ	icts & AOX ii	n leachate and s	oil in the contami	nated open
	dump sites in Colombo,Kandy, Nu	wareliya etc			
8.1	A detailed survey of the site with	2007	CEA, ME, ,	Report on the	
	regard to its topography (terrain),		CMC & ITI, BOI	situation analysis	
	rainfall pattern, soil characteristics			of Bluemendal	
	etc.			dumping site	
8.2	Identification of representative	2007	-do-	No of Sample	
	sampling locations and carry out			Collected	
	sampling accordingly				
8.3	Organise testing of above 2.2 for	2008	-do- with	Contaminated	
	PCDD/PCDF and AOX		overseas	levels of	
			technical	PCDD/PCDF	
			support		
8.4	Maintain above 2.3 as baseline data	Continue	-do-	Monitoring Plan	
	and continue periodic testing to				
	assess effectiveness of BAT/BEP				

Note: This research & development action can be coupled with management option No 3.

# 9. Investigation of contamination of animal milk and human milk in the scavenging animals and people living close vicinity to the dump sites

As in Colombo, solid wastes generated from other urban areas including small towns are being disposed of haphazardly onto productive land. There are no proper pollution control mechanisms applied. There is also no control with respect to scavenging by humans and animals.

Most of the times, these dump sites are set on fire intentionally or unintentionally. These waste dumps contain unsegregated mixed waste including plastic and hospital waste. It is expected that the open burning of such wastes may emit highly toxic gases and substances. Several studies in other developing countries in similar type of dump sites, have revealed not only presence of PCDD/PCDF but also PITs in milk of feeding mothers who are engaged in scavenging at the dumping sites. Therefore, study on such contamination is very useful to identify the short/long term impacts on animals and human beings. This will also enable to identify the importance of designing a proper solid waste management system.

Table 14(j): Investigation of contamination of animal milk and human milk in the scavenging animals and people living close vicinity to the dump sites

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues			
0	1	2	3	4	5			
9.	Investigation of contamination of animal milk and human milk in the scavenging animals and people living close vicinity to the dump sites							
9.1	Situation analysis of environmental	2007	ME, CEA,ML &	Situation analysis				

	issues including the details of scavengers and potential exposure people in and around the dumping sites.		ITI, MoH	Report	
9.2	Identification of representative sampling locations and carry out sampling accordingly	2007	CEA,ML & ITI, MoH	Identified locations of sample	
9.3	Organise testing of above 2.2 for PCDD/PCDF	2008	-do- with overseas technical support	Contaminated levels of PCDD/PCDF	
9.4	Preparation of Guidelines for solid waste dump site with respect to PCDD/PCDF	2008	do- with overseas technical support	Set of guidelines for solid waste dump sites	
9.5	Implementation of Solid waste Guidelines and monitoring	2008	CEA, BOI and MLG		

[This need not be given high priority as integrated solid waste management practice implementation if given support and priority will take care of these issues as the data generated will be less useful]

### 10. Research on recycling potential for flammable material

The inventory has revealed, landfill fires as the highest contributor for PCDD/PCDF emissions in Sri Lanka (57% of total air emissions). This situation is same with respect to some other countries in the region such as Cambodia, Philippines etc. Investigations have revealed that frequent landfill fires are mainly due to accumulation of combustible material within solid waste disposal sites. Hence, avoidance of such material reaching landfill sites will greatly reduce fire eruptions.

Therefore, research on recycling potential for such material is an essential need of the country.

Table 14 (k): Research on recycling potential for flammable material

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
10	Research on recycling potentia	l for flammab	le material		
10.1	Identify potentially combustible material reaching at dump sites	2007	CEA & MLG	Report on combustible materials in the dumping sites	
10.2	Study on source and the potential recyclings and develop a management mechanism	2008	ME, CEA, MLG & ITI	Action plan	
10.3	Implementation of Action Plan	2009and continue	M/Industries and Chambers, CEA & MLG, BOI	Quantity of wastes recycled	
10.4	Monitoring of implementation of Action Plan	2009and continue	-do-	Increase of quantity of recyclable waste	

# 11. Assessment of unintentional by products in process sludge/air emissions and treatment of sludge in BOI plants and traditional secondary smelting plants

The residue generated from a BOI approved secondary smelting plants are of two types with respect to its origin. These are;

- (a). Residue (slag) remaining within the furnace floor subsequent to smelting.
- (b). Residue trapped by wet scrubbing and subsequent sedimentation to arrest air pollution.

The former has been exposed to a high temperature only, whereas the latter has been exposed to a progressive cooling process (by wet scrubbing) that is favourable for PCDD/PCDF formation. However, to ascertain this theoretical situation, it is necessary to test both types of residue separately for PCDD/PCDF. If the said situation reveals true the relevant residue handling techniques and additional precautionary measures required to prevent PCDD/PCDF release can be proposed.

Although the gas cleaning systems are incorporated in BOI secondary smelting plants, the effectiveness of these systems is not known. Therefore, it is also useful to test the PCDD/PCDF levels in the stack emissions and thereby to check the efficiency of wet scrubbers with respect to PCDD/PCDF removal.

As traditional smelting plants do not have any APC devices, testing of its fly ash (residue) directly discharged into the atmosphere will enable to make a justifiable assessment with regard to the need of such APC devices.

Table 14 (I): Assessment of unintentional by products in process sludge/air emission and treatment of sludge in BOI plants and traditional secondary smelting plants

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
11.	Assessment of unintentional b				treatment
	of sludge in BOI plants and trad	itional secon	dary smelting pl	ants	
11.1	Select representative samples of air and residue in BOI and traditional secondary smelting plants	2007	CEA & ITI	Report on methods adopted and analytical report	
11.2	Organise testing for PCDD/PCDF	2008	-do- with overseas technical support	Emission levels of PCDD/PCDF	
11.3	Propose relevant BAT/BEP accordingly and identify a management tool to implement above BAT/BEP with a time frame for its implementation	2008	-do-	Action plan	
11.4	Implementation of Action Plan	2009	BOI, CEA&		
11.5	Monitoring of implementation of Action plan	2009 and cont	BOI,CEA &ML	No of industries implemented the Action Plan	

# 12. Assessment of unintentional by-products in the soil contaminated from the waste water and sludge released from service stations

Vehicle servicing is a major activity in the transport sector including railways. The waste engine oil used for the cooling and lubricant purposes are collected and sold out for recycling purposes particularly for the secondary smelting industries. Huge amount of mud and sludge from the oil separators are collected and disposed of without any treatment all over the country. Most of the time along with the Municipal waste collection system and dumped in the municipal dump yards. As the oils are subject to 100- 500  $^{\circ}$ C it is suspected of generate PCDD/PCDF. Therefore, testing of PCDD/PCDF in the soil contaminated from the waste and sludge released from service stations will enable to assess the pollution potential of such materials.

Table 14 (m): Assessment of unintentional by products in the soil contaminated from the waste water and sludge released from service stations

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
12	Assessment of unintentional by and sludge released from service		the soil contami	nated from the w	aste water
12.1	Study the type and quantities sludge generated and the possibility of contamination of soil	2007	CEA, MT, BOI, ITI & ML	Situation Report	
12.2	Identified suitable sample location and collection of samples	2007	CEA, BOI, ITI with the assistance of the international expert	Collection of sample	
12.3	Testing of samples	2008	CEA, BOI, ITI with the assistance of the international consultant	Test	
12.4	Preparation of guidelines to the Handling of waste water and sludge based on the results of the test,	2008	CEA, BOI, ITI with the assistance of the international consultant	Set of Guidelines	

### 13. Life cycle assessment of PVC materials used

PVC materials are widely used due to its non-degradable property. This material has been identified as having a high potential to release PCDD/PCDF if gets exposed to high temperatures. (The toolkit says that if only PVC is burnt, 40-3,500µg of PCDD/PCDF is trapped in per tonne of soot produced – Page No: 120).

PVC materials are often noted at landfill sites. These have a high risk to fire exposures due to the reasons mentioned in 2 above and such fires could lead to PCDD/PCDF emissions.

A life cycle assessment of PVC materials will enable to identify the reasons for its disposal of at landfill sites. Accordingly, an environmentally sound management mechanism (both technical and legal) can be proposed to prevent PVC material reaching at landfill sites.

Table 14(n): Life cycle assessment of PVC materials used

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
13	Life cycle assessment of PVC m	aterials used			
13.1	Details of Importations of PVC in	2007	Customs,	Report on the	
	any form.		BOI & CEA	Total Quantity of	
				PVC imported	
				per year	
13.2	Assessment of waste generation,	2008	ME, CEA,	Situation	
	existing practices of disposal		MLG, BOI	Analysis report	
13.3	Existing practices of disposal	2007	-do-	Situation Report	
14.4	Evaluation of data	2008	-do-	<b>Evaluation report</b>	
13.5	Identify reasons for disposal of at landfill sites	2008	-do-	Evaluation report	
13.6	Preparation of Action plan on	2008	-do-	Report on the	
	proper collection system and			collection and	
	recycling methodology Propose a			recycling of PVC	
	suitable mechanism to prevent			waste	
	them reaching at landfill sites				
13.7	Implementation of Action plan	From 2009	-do-		
13.8	Monitoring of implementation of	From 2009	-do-	Quantity of	
	action plan			wastes recycled	

### 14. Risk assessment on use of biomass for cooking

As per the inventory, burning of biomass has been identified as the third biggest contributor for PCDD/PCDF emissions into air. The guidelines given in the toolkit was the only criteria used for deriving the said finding. However, Sri Lanka had been engaged in biomass burning cooking practises from the time immemorial and there had been no proven evidence of toxicity so far. Hence, the reality of considering biomass burning as a considerable PCDD/PCDF source is doubtful. This will be the same for other countries as well. Hence, a risk assessment on biomass burning cooking practices will enable to resolve this issue.

Table 14 (o): Risk assessment on use of biomass for cooking

	Research & Development Action / Activities	Timefra me	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
14.	Risk assessment on use of bioma	ss for cook	ing		
14.1	A comparative survey on the health situation of personnel engaged in biomass burning cooking practises and other practises	2007	ME, CEA, MLG, Universities, ITI & NERD	Identification of impacts due to biomass burning cooking practises and other practises as well	
14.2	Air sampling of biomass burning emissions & testing for PCDD/PCDF	2007	ME, ITI along with overseas technical support	Number of samples tested	
14.3	Investigation of outputs derived in 7.1 & 7.2 above in terms of impacts due to burning of biomass	2008	<b>ME</b> , CEA, ITI & NERD	Amendments to the guidance given in the toolkit	

3.3.4.3 Resource Requirements

		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Implement into	6,400	10,700	6,400	6,400	6,400	6,400	0	0	0	0
_	legislation BAT /BEP	0	0	1,200	0	1,200	0	0	0	0	0
_	requirement for new	3,600	2,200	2,400	2,400	2,400	2,400	0	0	0	0
	sources	10,000	12,900	10,000	8,800	10,000	8,800	0	0	0	0
		6,400									
7	existing sources and										
:	identify the deficiencies	3,600									
		10,000	0	0	0	0	0	0	0	0	0
			3,600								
,	Identify the BAT/BEP										
<u>,</u>	requirement		1,000								
		0	4,600	0	0	0	0	0	0	0	0
			3,600								
۸,	Drafting legislation										
<u>.</u>	Claring registation										
		0	3,600	0	0	0	0	0	0	0	0
			200								
4	Approvals										
		0	200	0	0	0	0	0	0	0	0
			3,000								
1.5	Gazette the regulations —		1,200								
		0	4,200	0	0	0	0	0	0	0	0
				6,400	6,400	6,400	6,400				
9	Monitor implementation			1,200		1,200					
?	MOINTO THE PROPERTY OF THE PRO			2,400	2,400	2,400	2,400				
		0	0	10,000	8,800	10,000	8,800	0	0	0	0

2016	0	0	0	0				0				0				0				0			0			0		
2015	0	0	0	0				0				0				0				0			0			0		
2014	0	0	0	0				0				0				0				0			0			0		
2013	0	0	0	0				0				0				0				0			0			0		
2012	6,400	0	2,400	8,800				0				0				0				0			0			0		
2011	6,400	1,200	2,400	10,000				0				0				0				0			0			0		
2010	6,500	0	2,400	8,900				0				0				0				0			0			0		
2009	2,000	0	0	2,000				0				0				0				0			0			0		
2008	5,200	0	0	5,200				0				0	2,000			2,000	2,400			2,400	300		300	200		200	300	
2007	3,400	1,100	1,500	000'9	2,400	1,100	1,500	5,000	1,000			1,000				0				0			0			0		
	0	Review & upgrade	solid waste management			Review existing legislation in Sri I anka for solid	Wastes management		Compare 2.1 above with the	legislative provisions of other	reference to minimizing	PCDD/PCDF		Upgrade/amend existing	findings in 2.2 above		Summarise outcome of 2.3 above	into a common structure clearly	defining the responsible	Stakei Olders.		Draft amended requisation			Applovais		Gazette the regulation	
		·	٧			7				00					ر. د.ک			2.4				2.5			 0.7		2.7	

2016	-	0				0		5 2016			1	•												_								
2015		0				0		2015	000'9	1,000	13,604	20,604				•				•					•	•	•	•	•			
2014		0				0		2014	10,000	1,400	73,000	84,400				•				•					•	•	•	•				
2013		0				0		2013	10,000	1,000	3,000	14,000				•				•												
2012		0	6,400		2,400	8,800		2012	36,000	700,000	24,000	760,000				-				•				•								
2011		0	6,400	1,200	2,400	10,000		2011	24,000	25,000	25,000	74,000				-				•				•								
2010		0	6,500		2,400	8,900		2010	36,000	40,000	24,000	100,000				-				•				•							•	
2009		0	2,000			2,000	•	2009	5,000	6,500	27,600	39,100				-				•				•						•		
2008		300				0		2008	57,600	23,700	13,600	94,900				-	10,000	3,900	4,800	18,700	5,000	3,600	2,000	10,600	3,600	9 800	000,0	2,000	2,000 <b>15,400</b>	2,000 15,400 39,000	2,000 15,400 39,000 6,400	2,000 15,400 39,000 6,400 4.800
2002		0				0		2007	1,000	-	•	1,000	1,000			1,000				•				•					•			
	0	⊥	I	С	0	_			I	С	0	<b>-</b>	I	ပ	0	T	I	ပ	0	<b>-</b>	I	ပ	0	-	I	ပ		0	0	0 - 1	O H H C	0 - = 0
				Monitor implementation					Implement proper solid	waste	management/disposal	mechanisms	Identification of a co-	ordination mechanism	which is acceptable to all	stakeholders	Carry out a situation	analysis with regard to	existing solid waste	management systems	Prepare guidelines for	waste disposal in	accordance with BAT &	ВЕР		Identify weaknesses of	Co Jo moitotage - I manife	Implementation of 3RS	Implementation of งหร	Implementation of 355	Implementation of 3Ks Identification of feasible	Implementation of 3Ks Identification of feasible and practicable disposal
				α						~	<b>7</b>			ر ب	- ်			0	3.6			c	oo			7	t				c r	3.5

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Identification of	ェ			2,000							
0	necessary technical &	၁			6,500							
o.;	financial resources to	0			3,600							
	local authorities	_	•	•	12,100	•	•	•	•	•	•	
	Implementation of proper	ェ			3,000	36,000	24,000	36,000	10,000	10,000	000'9	
7	solid waste disposal	ပ				40,000	25,000	700,000	1,000	1,400	1,000	
· ·	technology/ies in selected	0			24,000	24,000	24,000	24,000	3,000	73,000	13,604	
	local Authority Areas	⊢	•	•	27,000	100,000	73,000	760,000	14,000	84,400	20,604	
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Implement proper	ェ	2,000	009'6	00006	39,000	39,000	36,000	-	1	1	
_	medical waste	ပ	2,500	27,500	27,500	652,500	802,500	1,000,000	-	1	-	
†	management/disposal	0	1,200	8,100	006'9	006'9	006'9	4,500	•	•	•	
	mechanisms	<b>–</b>	5,700	45,200	43,400	698,400	848,400	1,040,500	•	•	•	
	:	ェ	1,000									
7	Review of existing medical	၁	2,500									
ļ. -	wastes management disposal techniques	0	1,200									
		_	4,700	•	•	•	•	•	•	•	•	
	Identify shortcomings and	ェ	1,000	3,600								
•	inereby relevant improvements/ technologies.	၁		2,500								
4.7	Identify a mechanism for	0		3,600								
	Implementing tnese technologies	-	1,000	9,700								
	Implement above.	I	-	6,000	6,000	36,000	36,000	36,000				
•	Report/ Activity plan in	ပ	-	25,000	25,000	650,000	800,000	1,000,000				
4. ک	selected hospitals in all	0	•	4,500	4,500	4,500	4,500	4,500				
	demonstration project	<b>-</b>	•	35,500	35,500	690,500	840,500	1,040,500	•	•	•	
		Н			3,000	3,000	3,000					
7	Monitoring of	ပ			2,500	2,500	2,500					
t t	Activity plan	0			2,400	2,400	2,400					
		⊢	•		006 2	006 2	006 2		•	•	•	

2,500 2,400 7,900

2,500 2,400 7,900

2,500 2,400 7,900

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Review existing	Н	1,000	8,500	4,400	26,400	13,900	3,400	0	0	0	0
	technology on	၁	0	4,800	0	39,800	44,800	4,800	0	0	0	0
	secondary metal	0	0	1,000	2,000	16,800	16,800	4,800	0	0	0	0
5a	iecycling plants including traditional industries and identify											
	necessary changes for	<b>⊢</b>	1,000	14,300	6,400	83,000	75,500	13,000	0	0	0	0
	upgrading these systems											
	Review the existing	I	1,000									
70	technologies of traditional	Э										
ם מ	secondary smelting	0										
	plants for improvements	L	1,000	0	0	0	0	0	0	0	0	0
	Identify the required	I		6,000								
500	improvements/technologi	ပ										
292	es and inclusive of	0										
	BAT/BEP	L	0	6,000	0	0	0	0	0	0	0	0
		ェ		2,500								
70.7	Identify a mechanism for	Э		4,800								
283	implementing above 5.2a	0		1,000								
		⊢	0	8,300	0	0	0	0	0	0	0	0
		т			2,000	24,000	11,500					
707	Implementation of Action	ပ				35,000	40,000					
2 2 4	plan	0			1,000	12,000	12,000					
		L	0	0	3,000	71,000	63,500	0	0	0	0	0
	, , , , , , , , , , , , , , , , , , ,	I			2,400	2,400	2,400	3,400				
ה ה	implementation of Action	ပ				4,800	4,800	4,800				
3		0			1,000	4,800	4,800	4,800				
		⊢	0	0	3,400	12,000	12,000	13,000	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	Review existing	ェ	000'9	17,200	13,100	6,400	36,000	36,000		1	1	0
	technology on	ပ	1	31,200	58,000	25,000	50,000	50,000			1	0
	secondary metal	0	1,500	11,400	10,200	4,800	4,800	4,800			1	0
2p	recycling plants including traditional industries and identify necessary changes for upgrading these systems	F	7,500	29,800	81,300	36,200	90,800	90,800		•		0
		エ	1,200	1,200								
7	Control of importation of	ပ		2,400								
_ 	recyclable material	0	200	1,200								
		<b>-</b>	1,700	4,800	•	•	•	•	•	•		0
	Computerize importation	I		4,800	4,800							
i		ပ		12,000	12,000							
5b2		0		6,400	3,000							
	balancing checks)	-	•	19,800	19,800	•	•	•	•	ı	•	0
	Review existing	エ	4,800	4,800	4,800							
	technologies of the scrap	ပ		4,800	4,800							
2p3		0	1,000	2,400	2,400							
	and identify the possible BAT/BEP	-	5,800	12,000	12,000	•	•	•	•	•	•	0
	41.00	ェ		6,400	3,500	6,400	36,000	36,000				
7	Implement the sultable BAT/BED in any identified	ပ		12,000	10,000	25,000	50,000	50,000				
) )		0		4,800	4,800	4,800	4,800	4,800				
		-	•	23,200	18,300	36,200	90,800	90,800	•	•	•	0

		2007	2008	2009	2010	2011	2012	2013	2014	2015 2016	2016
Review existing	Н	8,800	35,300	28,800	29,400	11,200	-	-	0	0	0
crematories designs for	ပ	3,000	37,000	55,400	205,400	405,400	ı	1	0	0	0
its acceptance and	0	16,500	21,400	20,000	25,000	9,800	•		0	0	0
identify changes	H	28,300	93,700	104,200	259,800	426,400	•		0	0	0
Review of existing	I	4,000	12,500								
crematoria designs and	ပ	3,000	12,000								
identify shortcomings with	0	4,500	6,400								
respect to temperature controls and thereby the required BAT/BAP	F	11,500	30,900	ı					0	0	0
	I	4,800	4,800								
Identify measures to	ပ										
improve shortcomings	0	12,000									
1	H	16,800	4,800	•	•	•	•	•	0	0	0
	ェ		18,000	24,000	24,000	6,400					
Implement the Action	ပ		25,000	50,000	200,000	400,000					
1	0		15,000	15,000	20,000	4,800					
1	H	•	58,000	89,000	244,000	411,200	•		0	0	0
	ェ			4,800	5,400	4,800					
Monitoring of	Э			5,400	5,400	5,400					
	0			5,000	5,000	5,000					
	L	0	0	15200	15800	15200	0	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	R&D: Development of	Н		42,400	11,000	16,000	_	-	-	-	-	0
١	an emission factor for	ပ	1	24,000	12,200	200,000	1	1	1	1	1	0
`	charcoal production	0		26,400	22,000	40,000	1	1				0
	(Coconut shell).	<b>—</b>	•	92,800	45,200	256,000	•	•	•		•	0
	A survey of charcoal	ェ		6,400								
i	production sites and	ပ		12,000								
7.1	selection of	0		6,400								
	representative sampling locations	T	•	24,800	•	•	•	•	•		•	0
	:	I		36,000								
7		ပ		12,000								
7. /	special reference to	0		20,000								
	200000000000000000000000000000000000000	⊢	•	68,000	•	•	ı	•	•			0
	Organise testing of above	ェ			6,000	16,000						
7	1.2 for PCDD/PCDF (1.2	၁			5,000	200,000						
	and 1.3 may combined	0			20,000	40,000						
	together)	<b>—</b>	•		31,000	256,000	•	•		•	•	0
		エ			5,000							
7		2			7,200							
<b>.</b> 4.	actor based off output of	0			2,000							
		L	•	•	14,200	•	•	•	•	•	•	0
										All costs are in	s are in	

										Ü	US\$	
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	R&D: Investigate	I	0	12,000	13,000	36,000	6,400	6,400	6400	0	0	0
	unintentional by	ပ	0	20,000	000'9	25,000	25,000	25,000	26000	0	0	0
o	products & AOX in	0	0	12,000	30,000	30,000	30,000	100,000	30000	0	0	0
•	contaminated open dump site (eg:Bloemendal)	F	0	44,000	49,000	91,000	61,400	131,400	62400	0	0	0
8.1	8.1   A detailed survey of	I		12,000								
	Bloemendal site with											
		ပ										

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	regard to its topography			20,000								
	(terrain), rainfall pattern,	0		12,000								
	soil characteristics etc.	<b>—</b>	0	44,000	•	•	•	•	0	0	0	0
	Identification of	ェ			3,000							
0	representative sampling	C										
0.7	locations and carry out	0										
	sampling accordingly	<b>—</b>	0	•	3,000	•	•	•	0	0	0	0
		Ŧ			10,000							
0	Testing of above 2.2 for	ပ			000'9							
	PCDD/PCDF and AOX	0			30,000							
		<b>—</b>	0	•	46,000	•	•	•	0	0	0	0
	Maintain above 2.3 as	ェ				36,000	6,400	6,400	6,400			
	baseline data and	ပ				25,000	25,000	25,000	26,000			
4.	continue periodic testing	0				30,000	30,000	100,000	30,000			
	BAT/BEP	-	0	•		91,000	61,400	131,400	62400	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	R&D :Investigation of	ェ	0	3,600	3,600	82,400	24,000	0	0	0	0	0
	contamination of animal	ပ	0	4,800	4,800	100,000	150,000	0	0	0	0	0
c	milk and human milk in	0	0	4,800	4,800	260,000	200,000	0	0	0	0	0
ກ	the scavenging animals and people living close vicinity to the dump sites	F	0	13,200	13,200	442,400	374,000	0	0	0	0	0
	Situation analysis of	т		3,600	3,600							
	environmental issues	ပ		4,800	4,800							
7	including the details of	0		4,800	4,800							
- -	scavengers and potential exposed population in and around the dumping sites.	<b>⊢</b>	0	13,200	13,200	0	0	0	0	0	0	0
	Identification of	т				16,000						
9.5		ပ				25,000						
	locations and carry out											
		0										

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	sampling accordingly					30,000						
		_	0	0		71,000	0	0	0	0	0	0
		I				36,000						
0	Organise testing of above	ပ				25,000						
9. O.		0				30,000						
		<b>—</b>	0	0		91,000	0	0	0	0	0	0
	Preparation of Guidelines	ェ				6,400						
2	_	ပ										
4	_	0										
	PCDD/PCDF	<b>—</b>	0	0	0	6,400	0	0	0	0	0	0
	-	ェ				24,000	24,000					
0		ပ				20,000	150,000					
9. U.	waste duldeillies alla	0				200,000	200,000					
	D.	<b>-</b>	0	0	0	274,000	374,000	0	0	0	0	0

H         0         1200         15600         9600         96           C         0         4800         24600         13400         13           T         0         2400         22400         12000         12           H         1200         1200         4800         3500         35           C         4800         4800         0         0         0           H         8400         8400         0         0         0           C         8400         8400         0         0         0           C         6400         8000         0         8000         0           H         8400         8400         8400         8400				2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
C         0         4800         24600         13400         13           O         0         2400         22400         12000         12           T         0         8400         4800         35000         35           C         4800         4800         0         0         0           H         8400         8400         0         0         0           C         8400         8400         0         0         0           C         6400         0         8000         0           T         0         8000         0         8400         0           H         8400         8400         8400         0			I	0	1200	15600	0096	0096	0	0	0	0	0
O         0         2400         22400         12000         12           T         0         8400         62600         35000         35           H         1200         1200         4800         35           C         4800         4800         0         6400           H         4800         6400         6400           C         6400         8000         0           H         8400         8400         0	<b>7</b>		ပ	0	4800	24600	13400	13400	0	0	0	0	0
T         0         8400         62600         35000         35           H         1200         1200         1200         35	2		0	0	2400	22400	12000	12000	0	0	0	0	0
H       1200       1200         C       4800       4800         O       2400       2400         T       8400       8400       0         H       4800       6400       0         C       6400       8000       0         T       0       19200       8400         H       8400       8400       8400			<b>—</b>	0	8400	62600	35000	35000	0	0	0	0	0
C       4800       4800         O       2400       2400         T       0       8400       8400       0         H       4800       6400       0         C       6400       8000       0         T       0       19200       8400         H       8400       8400			I		1200	1200							
O         2400         2400           T         0         8400         8400         0           H         4800         6400         0           C         8000         0         0           T         0         0         19200         8400	7	Identify flammable	ပ		4800	4800							
T         0         8400         8400         0           H         4800         6400         6400           C         8000         8000         6400           T         0         19200         0           H         8400         8400	- - -	material reactiling dump sites	0		2400	2400							
H 4800 C 6400 O 8000 T 0 0 19200 0		2010	_	0	8400	8400	0	0	0	0	0	0	0
C 6400 O 8000 T 0 0 19200 0		Study on source and the	I			4800							
T 0 0 19200 0 H	(	potential recyclings and	ပ			6400							
T 0 0 19200 0	10.2	develop a management	0			8000							
H H		niedianishi and adion plan	-	0	0	19200	0	0	0	0	0	0	0
0010	10.3	10.3   Implementation of Action	ェ			8400	8400	8400					
Plan   C   12000   12000   12000		Plan	ပ			12000	12000	12000					
0096   0096   0096   O   O   O			0			0096	0096	0096					

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		_	0	0	30000	30000	30000	0	0	0	0	0
		I			1200	1200	1200					
7	Monitoring of Action of Action	С			1400	1400	1400					
4	Plan	0			2400	2400	2400					
	5	<b>-</b>	0	0	2000	2000	2000	0	0	0	0	0

2016																	
	1	-	•	•	L							•				•	
2015	1	-	1	•				٠				•				•	
2014	1	-	1	•				•				1				•	
2013	1	-	•	•				•				•				•	
2012	24,000	16,000	120,000	160,000				•				•				•	
2011	24,000	16,000	120,000	160,000				•				•				•	
2010	60,000	84,400	148,000	292,400				•	24,000	60,000	12,000	96,000	12,000	8,400	16,000	36,400	
2009	16,000	1,200	10,000	27,200	16,000	1,200	10,000	27,200				•				•	
2008	•	-	•	•				•				•				•	
2007		-	•	•				•				•				•	
	I	၁	0	⊢	Ξ	ပ	0	-	I	Э	0	⊢	Т	O	0	_	
	R&D: Assessment of	unintentional by	emissions and residue	generated from BOI and traditional secondary smelting plants	Select representative	samples of air and	residue in BOI and	inautional secondary smelting plants		Organise testing for	PCDD/PCDF		Propose relevant	BAT/BEP accordingly and	Identify a management	BAT/BEP with a time	frame for its implementation
			7	<b>E</b>		; ;	1.				71.7				7		

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	-	I				24,000	24,000	24,000				
7	Implementation and	C				16,000	16,000	16,000				
- - 4.	11.4 Monitoring of Action plan	0				120,000	120,000	120,000				
		<b>-</b>	•	•	•	160,000	160,000	160,000	•			
			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	R&D : Assessment of	ェ	0	0	00809	00809	0	0	0	0	0	0
	unintentional by	ပ	0	0	61000	00089	0	0	0	0	0	0
Ç		0	0	0	38000	42000	0	0	0	0	0	0
71	waste water and sliidge	<b>—</b>	0	0	159800	165800	0	0	0	0	0	0
	released from service											
	stations											
	Study the type and	T			4800							
(	quantities sludge	၁			16000							
12.1	generated and the	0			12000							
	contamination of soil	-	0	0	32800	0	0	0	0	0	0	0
	Identify suitable sample	ェ			56000	26000						
100		C			45000	45000						
7:7		0			26000	26000						
	Testing of samples	<b>-</b>	0	0	127000	127000	0	0	0	0	0	0
	Preparation of guidelines	T				4800						
10.2		C				18000						
5.		0				16000						
	on the results of the test,	<b>-</b>	0	0	0	38800	0	0	0	0	0	0

ycle to f PVC sed         H         0         4,800         5,400         4,800         4,800         4,800         4,800         10		_		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
R&D: Life cycle         C         0         2,400         48,000           assessment of PvC materials used         T         0         5,400         60,800           PvC Activity         H         4,800         161,200           PvC Activity         T         0         12,600         24,000           Assessment of waste of generation, existing practices of disposal         T         0         24,000           Existing practices of disposal         T         0         4,800           Existing practices of disposal         T         0         4,800           Existing practices of disposal         T         0         4,800           Evaluation of data         C         C         2,400           Evaluation of data         C         2,400           Feparation of Action plan         H         0         8,400           Preparation of Action plan         H         0         7,200           Preparation of Action plan         H         0         7,200           methodology Propose a suitable mechanism to protein them reaching at protein them reaching at the protein t			I	0	4,800	52,400	11,200	11,200	0	0	0	0	0
assessment of waste disposal         T         0         5,400         60,800           PVC Activity         T         0         12,600         161,200           PVC Activity         T         0         2,400         0           Assessment of waste clearation, existing practices of disposal disposal         C         24,000         24,000           Existing practices of disposal disposal disposal         T         0         4,800         1,200           Evaluation of data disposal disposal disposal disposal of at landfill sites         C         2,400         2,400           Preparation of Action plan or proper collection system and recycling methanism to proper it them reaching at suitable mechanism to proper it them reaching at the methanism to proper it the methanism tor	5	R&D: Life cycle	ပ	0	2,400	48,000	20,400	20,400	0	0	0	0	0
T	2	materials used	0	0	5,400	60,800	27,600	27,600	0	0	0	0	0
Details of Importations of PVC Activity         C         2,400           PVC Activity         C         2,400           Assessment of waste of generation existing practices of disposal sposal of spoosal         T         0         12,600         0           Existing practices of disposal spoosal of spoosal of spoosal of spoosal of a landfill sites         T         0         0         4,800           Evaluation of data on proper collection of system and recycling methodology Propose a suitable mechanism to prevent them reaching at prevent them reaching at suitable mechanism to provide a suitable mechanism to prevent them reaching at suitable mechanism to provide a suitable mechanism to prevent them reaching at suitable mechanism to provide a suitable			T	0	12,600	161,200	59,200	59,200	0	0	0	0	0
Details of Importations of PVC Activity         C         2,400         0           PVC Activity         T         0         12,600         0           Assessment of waste generation , existing practices of disposal         C         24,000         4,800           Existing practices of disposal disposal         T         0         4,800         4,800           Evaluation of data disposal of at landfill sites on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to prove them them reaching at proper collection system and recycling methodology Propose a suitable mechanism to proper collection are suitable mechanical are suitable mechanic			I		4,800								
PVC Activity         O         5,400         0           Assessment of waste generation , existing practices of disposal disposal         T         O         12,600         D           Existing practices of disposal disposal         T         O         O         4,800           Evaluation of data disposal disposal disposal disposal disposal disposal disposal of at landfill sites         T         O         C         2,400           Preparation of Action plan methodology Propose a suitable mechanism to proper collection system and recycling methodology Propose a suitable mechanism to proper collection disposal disposal at them reaching at proper collection are suitable mechanism to proper collection disposal at them reaching at proper collection are suitable mechanism to proper collection disposed a suitable mechanism to proper collection disposed d	7.7	Details of Importations of	C		2,400								
Assessment of waste generation , existing practices of disposal disposal         T         0         12,600         24,000           Existing practices of disposal disposal disposal disposal disposal disposal disposal on proper collection on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to provide them.         T         0         4,800           Evaluation of data on proper collection system and recycling methodology Propose a suitable mechanism to provide them.         T         0         8,400           Proper methodology Propose a suitable mechanism to prove collection bland them reaching at them.         T         0         0         42,400           Proper collection solution of proper collection system and recycling methodology Propose a suitable mechanism to proper collection should be accorded to the proper collection of the proper collection system and recycling at them.         T         0         0         42,400		PVC Activity	0		5,400								
Assessment of waste generation , existing practices of disposal disposal         H         24,000           Existing practices of disposal disposal disposal disposal disposal disposal disposal disposal or proper collection or proper collection on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to proper cultural them reaching at participates and recycling are recycling and recycling and recycling and recycling are recycling and recycling and recycling are recycling and recycling and recycling are recycling and recycling are recycling and recycling			_	0	12,600	0	0	0	0	0	0	0	0
Assessment of waste generation , existing practices of disposal disposal         C         4,800           Existing practices of disposal disposal disposal on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to product them reaching at the meaching at the meachin			I			24,000							
Existing practices of disposal         T         0         4,800           Existing practices of disposal         C         4,800           Evaluation of data of isposal of at landfill sites on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at landfill sites or landfi	40	Assessment of waste	ပ			12,000							
Existing practices of disposal disposal disposal of data on proper collection system and recycling methodology Propose a suitable mechanism to disposal or disposal or dispose a suitable mechanism to dispose a	7.5	generation, existing practices of disposal	0			4,800							
Evaluation of data disposal disposal dentify reasons for disposar of at landfill sites on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to bisposal of a landfill at the meaching at landfill at landfi			<b>-</b>	0	0	40,800	0	0	0	0	0	0	0
Existing practices of disposal         C <th< td=""><td></td><td></td><td>I</td><td></td><td></td><td>1,200</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></th<>			I			1,200							
disposal         O         O         2,000           Evaluation of data         T         0         0         3,200           Evaluation of data         C         2,400         1,200           Identify reasons for disposal of at landfill sites         C         8,400         4,800           Preparation of Action plan on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at suitable mechanism to prevent them reaching at suitable mechanism to prevent them reaching at the reaching at	200		ပ										
Evaluation of data disposal of a proper collection or proper collection on proper collection system and recycling methodology Propose a suitable mechanism to proper in the properties of t	ა. ა.		0			2,000							
Evaluation of data         H         4,800           C         0         2,400           Identify reasons for disposal of at landfill sites on proper collection on proper collection or proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at landfill sites.         Image: Collection of Action plan o			⊢	0	0	3,200	0	0	0	0	0	0	0
Evaluation of data         C         2,400           O         T         0         8,400           Identify reasons for disposal of at landfill sites         C         4,800           Preparation of Action plan on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at solution in them reaching at the r			I			4,800							
T	7.0		၁			2,400							
T   0   0   8,400     H	5 4.	Evaluation of data	0			1,200							
H			<b>-</b>	0	0	8,400	0	0	0	0	0	0	0
ldentify reasons for disposal of at landfill sites of disposal of at landfill sites of disposal of at landfill sites on proper collection on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at			т			4,800							
disposal of at landfill sites	12 7		ပ			1,200							
Preparation of Action plan H 6,400 on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at	5		0			1,200							
Preparation of Action plan H 6,400 on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at			⊢	0	0	7,200	0	0	0	0	0	0	0
on proper collection system and recycling methodology Propose a suitable mechanism to prevent them reaching at		Preparation of Action plan	I			6,400							
system and recycling methodology Propose a suitable mechanism to prevent them reaching at		on proper collection	ပ			12,000							
suitable mechanism to 0 42,400 prevent them reaching at	7.0	system and recycling	0			24,000							
prevent them reaching at	0.5	suitable mechanism to	<b>-</b>	0	0	42,400	0	0	0	0	0	0	0
landfill sites		prevent them reaching at landfill sites											
13.7 Implementation of Action H 6,400	13.7	Implementation of Action	I			6,400	6,400	6,400					

		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
plan	ပ			12,000	12,000	12,000					
	0			24,000	24,000	24,000					
	T	0	0	42,400	42,400	42,400	0	0	0	0	0
9	I			4,800	4,800	4,800					
Monitoring of	ပ			8,400	8,400	8,400					
13.0 IIIIplementation of action	0			3,600	3,600	3,600					
	<b>-</b>	0	0	16,800	16,800	16,800	0	0	0	0	0
									All costs are in	re in	
		1000							<u>\$</u> 000	1,60	9
		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	I	0	5000	0	8400	0	0	0	0	0	0
K&U: KISK assessment	ပ	0	24000	0	12000	0	0	0	0	0	0
on use of pioniass for	0	0	12000	0	10000	0	0	0	0	0	0
n N	<b>—</b>	0	41000	0	30400	0	0	0	0	0	0
A comparative survey on	I		2000								
the health situation of	ပ		24000								
personnel engaged in	0		12000								
biomass burning cooking practises and other	۲	•	44000	ď	ď	c	ć	•	c	•	•
practises	-	>	41000	<b>&gt;</b>	>	>	>	>	>	>	>
1 3	I		2000								
Air sampling of blomass	၁		20000								
testing for PCDD/PCDF	0		60000								
	<b>-</b>	0	0	0	0	0	0	0	0	0	0
Investigation of outputs	I				8400						
derived in 8.1 & 8.2	ပ				12000						
above in terms of impacts	0				10000						
due to burning of biomass	_	0	0	0	30400	0	0	0	0	0	0

H-Human costs C-Capital costs O-Operational costs T-Total costs

### 3.3.5 ACTION PLAN 5: MONITORING

### 3.3.5.1 Management Activities

Based on the analysis of the country baseline situation, considering the provisions of the Stockholm Convention as well as other relevant international treaties and national policies, pursuant to the national priorities and objectives for POPs management, the following objectives for monitoring were identified:

- 1.Monitor POPs in the environment
- 2. Monitor POPs in imported food and other relevant materials
- 3. Monitor POPs in exposed populations
- 4. Mobilize resources for monitoring

Research and Development

5. Identify low-cost methods for monitoring

The proposed monitoring objectives are described in more detail below. An implementation strategy table contains information on activities associated with the particular monitoring objective, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as linkages with the national activities on sustainable development are provided. All monitoring programs will require some resource mobilisation and generation of a monitoring network mechanism.

In the Resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

Since the entry of the POPs chemicals is restricted into the country, it is expected that POPs could be present in the Sri Lankan environment and food chain through the following:

- through imported food which are not checked for POPs at present
- through illegal entry
- Present in the environment as residues from the time they were permitted to be used in the country
- Present in the environment as by-product of activities which lead to POP formation

Implementation of a monitoring programme is required to asses the actual contamination levels in the environment.

Facilities are available in some laboratories in the country for monitoring of all the POPs except dioxin & furan. The Industrial Technology Institute was the only laboratory with international accreditation against ISO 17025 for analysis of pesticides including the POPs. However since there is no budget allocation for a regular monitoring programme in any of the laboratories, data was sparse.

Available monitoring data before 2003 was for a few samples carried out by different institutions for different purposes and indicated that PCB and organochlorine pesticides (OCIs) were occasionally detected. Identifying that both food and environment were the most important components that required monitoring the monitoring carried out in 2003-2004 under the POPs project was for imported milk powder, tinned and dried fish and sediment and fish samples collected from polluted lagoons and the harbour. This data indicated POPs contamination in some of the samples. It was hoped that data could be obtained through the project for biological samples from exposed populations but this was not carried out since such exposed people could not be identified.

Lack of funds for regular monitoring programmes and maintenance of sophisticated instruments required for the monitoring

No import restrictions on food containing POPs allows the entry of contaminated food into the environment which allows not only exposure to the human population who consume this food but entry into the food chain allowing persistence in the environment Vague import categories could allow import of POPs with out detection and possible illegal entry.

The main objectives for monitoring:

- To have a regular POPs monitoring programme in the environment (sediment & biological samples); POPs are known to accumulate in sediment and biological tissue. Studies that have been carried out have detected some POPs in samples at selected locations. Regular monitoring is required to assess the status of the problem.
- To monitor exposed populations to assess existing situation and potential risk: The PCB team has identified that there are many transformers in Sri Lanka containing PCB. It is expected that personal working with transformers have therefore been exposed to PCB. In addition people living near incinerators and crematoriums could be exposed to POPs. No assessment of exposure of people to POPs has been done at present in this country.
- To monitor POPs in imported food Preliminary analysis indicated that dried fish entering the country contains residues of POPs pesticides. It is necessary to continue to check regularly the quality of the imported food, particularly fat containing food items since POPs accumulate in fatty tissues to assess our exposure to POPs through imported food.

#### Requirements/Activities to fulfil the above objectives:

- Set aside an annual budget for a regular monitoring programme of the environment and exposed populations (including maintenance and repair cost of equipment, training of staff on analytical techniques and repair of instrument)
- Assign laboratories with the required facilities to carry out this monitoring and provide required data

## 3.3.5.2 Implementation strategy

### 1. Monitor POPs in the environment (air, water, and soil)

Table 15(a): Monitor POPs in the environment

	Monitoring objective / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Monitor POPs in the environment				
1.1	Identification of locations and matrices to be monitored	2007	CEA/ITI/CEA/ ROP	List of locations and matrices	
1.2	Development of a monitoring system	2008	CEA/ITI/CEA/ ROP	Monitoring system	
1.3	Regular monitoring of identified locations	Continuous	-do-	Database Regular reports	

# 2. Monitor POPs in imported food and other relevant materials.

Table 15 (b): Monitor POPs in imported food and other relevant materials.

	Monitoring objective / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Monitor POPs in imported food	d and other re	evant materials.		
2.1	Make mandatory the submission of a POPs free certificate for imported food	2008	МоН	Legislation	
2.2	Random checking of food samples for POPs	Continuous	MoH/ITI/Other labs	Database Regular reports	

# 3. Monitor POPs in exposed populations

# Table 15 (c): Monitor POPs in exposed populations

	Monitoring objective / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Monitor POPs in exposed popula	ations			
3.1	Identification of exposed	2007	ME/MoH/	List of exposed	
	populations		MoAgr	populations	
3.2	Carry out monitoring of POPs	Continuous	MoH/DL(OH),	Database	
	levels in blood of the exposed		others	Regular reports	
	populations				

# 4. Mobilize resources for monitoring

# Table 15 (d): Mobilize resources for monitoring

	Monitoring objective / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4.	Mobilize resources for monitoring				
4.1	Identification of priority areas to be monitored	2007	ME/CEA/RoP	List of priority areas	
4.2	Identification of resource requirements	2007	ME/CEA/RoP	Inventory of resources required	
4.3	Identification of available resources	2007	ME/CEA/RoP	Inventory of available resources	
4.4 a	Identification of potential resource sources to be tapped	. 2007	ME/CEA/RoP	Inventory of potential resource sources	
4.5 a	Development of plan to mobilize the resources for monitoring of POPs	2007	ME/CEA/RoP	Resource mobilization plan	

# 3.3.5.2.1 Research and development

Following research and development actions were identified to facilitate the NIP implementation in Monitoring:

The proposed research and development actions are described in more detail in the following text. For each proposed R&D action an explanatory text describes the rationale behind selecting the particular option as well as its expected capacity to facilitate NIP implementation.

An implementation strategy table contains information on activities associated with the particular R&D action, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as linkages with the national activities on sustainable development are provided.

In the resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

# 5. Identification of low-cost methods for monitoring

Table 15 (e): Identify of low cost methods for monitoring

	Research & Development Action / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
5.	Identification of low cost meth	ods for mon	itoring		
5.1	Evaluation of available methods	2007	ME/ITI/CEA/RoP	Evaluation report	
5.2	Selection of suitable methods*	2007	ME/ITI/CEA/RoP	List of suitable methods	
5.3	Carrying out a pilot testing (if required)	2007-2008	ME/ITI/CEA/RoP	Pilot test results	
5.4	Recommendation on available options	2007	ME/ITI/CEA/RoP	List of recommended methods	

<sup>\*</sup>Includes the selection of processes (Collection of samples, preliminary qualitative testing, etc.)

# 3.3.5.3 Resource requirements

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
		ェ	5,000	27,800	8,400	8,400	8,400	8,400	8,400	8,400	8,400	0
Mon	Monitor POPs in the	ပ		273,000	273,000   250,000   250,000   10,000   200,000   20,000	250,000	10,000	200,000	20,000	20,000	20,000	0
envi	environment	0	2,000	24,000	12,000   12,000   12,000   12,000   12,000	12,000	12,000	12,000	12,000	12,000	12,000	0
		T	7,000	324,800	270,400	270,400   270,400   30,400   220,400   40,400	30,400	220,400	40,400	40,400	40,400	0
		I		2,400								
_	dentification of locations and	C		8,000								
matr	matrices to be monitored	0		4,000								
		_		14,400	•					•	•	0
		I	5,000	17,000								
1.2 Deve	Development of a monitoring	၁		15,000								
system	em	0	2,000	8,000								
		⊢	7,000	40,000	•	•	•	-	•	•	•	0
		I		8,400	8,400	8,400	8,400	8,400	8,400	8,400	8,400	
1, Regi	Regular monitoring of identified	ပ		250,000	250,000	250,000   250,000   10,000   200,000   20,000	10,000	200,000	20,000	20,000	20,000	
	locations	0		12,000	12,000	12,000   12,000   12,000   12,000	12,000	12,000	12,000	12,000	12,000	
		⊢	•	270,400	270,400 270,400	270,400	30,400	30,400 220,400	40,400	40,400	40,400	0

pital costs	
C – Ca	
ı costs	
H – Humon	

# O – Operational costs T – Total costs

			2007	2008	2009	2010	2011	2012	2013	2014	2015 2016	2016
	Monitor POPs in	I	1	12,000		7,200	10,000	10,000	10,000	10,000		0
	imported food and	၁	-	2,400	-	-	_	-	-	-	-	0
	other relevant	0	-	26,200	25,000	25,000	25,000	50,000	50,000	50,000	50,000	0
	materials.	_	•	40,600	32,200	32,200		000'09	000'09	000'09	000'09	0
	Make mandatory the	т		4,800								
7	submission of a POPs	ပ		2,400								
	free certificate for	0		1,200								
	imported food	_		8,400	•		•			•		0
2.2	Random checking of	I		7,200	7,200	7,200	10,000	10,000	10,000	10,000	10,000	
П	food samples for	ပ										

		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
POPs	0		25,000	25,000	25,000	25,000	50,000	50,000	50,000	50,000	
	T	•	32,200	32,200	32,200	35,000	000'09	000'09	000'09	000'09	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	.: - dOd y	I	1	15,600	15,600	7,200	10,000	10,000	10,000	10,000	10,000	0
,	Monitor PUPS In	ပ	1	12,400	12,400	10,000	10,000	10,000	10,000	10,000	10,000	0
·	populations	0	-	27,400	27,400	25,000	25,000	50,000	20,000	50,000	50,000	0
		_		55,400	55,400	42,200	45,000	20,000	70,000	70,000	20,000	0
		I		8,400	8,400							
	Identification of	C		2,400	2,400							
-	exposed populations	0		2,400	2,400							
		T	-	13,200	13,200	-	-	•	•	-	•	0
	Carry out monitoring	I		7,200	7,200	7,200	10,000	10,000	10,000	10,000	10,000	
c	of POPs levels in	ပ		10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	
i i	plood of the exposed	0		25,000	25,000	25,000	25,000	50,000	50,000	50,000	50,000	
	populations	T	•	42,200	42,200	42,200	45,000	70,000	70,000	70,000	70,000	0

¥	3
2	5 =
2	5
ot o	250
C	)

ı															
	2016	1	-	-	•				•				•		
	2015	•	-										•		
\$SN	2014	-	-						•				•		
All costs are in US\$	2013	-	-												
A	2012	-	-	1					•				-		
	2011		-						•				•		
	2010	-	-										•		
	2009	-	-	1	•				•				•		
·	2008	28,000	10,000	12,000	20,000				•	16,000	000'9	4,800	26,800	4,800	
	2007	4,800	-	1,200	000'9	4,800		1,200	000'9				•		
		I	C	0	-	I	ပ	0	_	I	C	0	T	т	ပ
			Mobilize 700011200 for	monitoring			Identification of priority	areas to be monitored			Identification of	resource requirements		Identification of	available
			_	4			4.1					4		4.3	

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	resources	0		2,400								
		_	•	7,200	•	•		•	•	•	•	•
	9 3 9 F - 1	I		4,800								
	Identification of	ပ										
1. 1.	solimes to be tapped	0		2,400								
	sodices to se tables	F		7,200	•	•	•				•	
	Development of plan	I		2,400								
7	to mobilize the	ပ		4,000								
4 ن	resources for	0		2,400								
	monitoring of POPs	⊢	0	0088	0	0	0	0	0	0	0	0

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	4	I	8,400	25,200					1			1
u	R&D Identify	С	2,400	12,400		-	-		1			1
n	nonitoring	0	1,200	26,000	•	1					1	1
	8	T	12,000	63,600	•	•	•	•	•	•		1
		Н	8,400									
7	Evaluation of available	C	2,400									
	methods	0	1,200									
		⊢	12,000									•
		I		8,400								
r C	Selection of suitable	С		2,400								
7.0	methods*	0		3,600								
		⊢	•	14,400	•			•		•		•
		Н		8,400								
0		С		10,000								
0.0	testing (if required)	0		20,000								
		⊢	•	38,400				•		•		•
		Н		8,400								
7	Recommendation on	С										
1	available options	0		2,400								
		⊢	•	10,800	•	•	•	•	•	•	•	•

# 3.3.6 ACTION PLAN 6: PUBLIC AWARENESS, INFORMATION DISSEMINATION AND TRAINING

Based on the analysis of the country baseline situation, considering the provisions of the Stockholm Convention and national policies, pursuant to the national priorities and objectives for POPs management, options for awareness raising, information dissemination and training were identified for the particular areas.

The proposed options are targeted to awareness raising of the relevant population groups in support of successful NIP implementation.

An implementation strategy table contains information on activities associated with the particular option, implementation timelines, responsible and supporting agencies for implementation, and indicators of success. Links to existing country programmes on chemical management, environmentally sound waste management and environmental pollution control as well as with the national activities on sustainable development are provided.

In the resource requirements human, capital and operation costs of the identified activities are described, considering the established timeline.

The management activities and strategies have been set out for the separate activities such as on the Stockholm Convention, Pesticides, PCBs, Unintentional Releases, Monitoring etc as given below.

### 3.3.6.1 Awareness Creation on Stockholm Convention

# 3.3.6.1.1 Management Activities

- 1. Create public awareness on existing and proposed legislations and regulations.
- Conduct seminars/workshops among stakeholders (industrialists, policy makers, provincial government officials) on compliance requirements for Stockholm Convention.
- 3. Maintain Web Site for Sri Lanka NIP

# 3.3.6.1.2 Implementation strategy

# 1. Create Public Awareness on existing and proposed legislation & Regulations

Table 16 (a): Creat Public Awareness on existing and proposed legislation & Regulations

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Create Public Awareness on exi	sting and pro	posed legislation	n & Regulations	
1.1	Particular legal documents	2007	CEA, ME & Stakeholders Institutions	Legislation implemented and complied with	
1.2	Specific regulations	2007/8	CEA, ME & Stakeholder Institutions	-do-	
1.3	Identify methodologies	2008	CEA, ME,	Methodology	
			Dept. of Information	adopted	

# 2. Conduct Seminars/Workshops among stakeholders (Industrialists, policy makers, provincial povernment officials) on comliance requirements for Stockholm Convention

Table 16(b): Conduct seminars/Workshops among stakeholders on compliance requirements for Stockholm Convention

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Conduct Seminars/Workshops	among sta	akeholders on	comliace require	ments for
	Stockholm Convention				
2.1	Identify target groups	2007	ME	Target groups	
	, , ,			identified	
2.2	Organize & conduct seminars	2007	ME	Feedback and	
				best practices	

# 3. Maintain Web site for Sri Lanka NIP

Table 16(c): Maintain Web Site for Sri Lanka NIP

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Maintain Web Site for Sri Lanl	ka NIP			
3.1	Create a Web Site	2007	ME	Functioning Website	
3.2	Regular updating	On going	ME	Update Reports	

# 3.3.6.2 Awareness on Pesticides

# 3.3.6.2.1 Management Activities

- 1.Development and implementation of a database
- 2. Training of stakeholders
- 3. Public awareness campaigns
- 4. Establishment of an information dissemination system

# 3.3.6.2.2 Implementation strategy

# 1. Development and implementation of a Database

Table 16 (d): Development and implementation of a Database

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Development and implementa	ation of a Data	abase		
1.1	Networking among	2008-2009	ROP/stake	Network in place	
	stakeholders		holders	-	
1.2	Data base development	2008-2009	ROP	Database ready	
1.3	Internet/communication	2007	ROP/stake	Connected	
	facilities		holders		

# 2. Training of stakeholders

Table 16 (e): Training of stakeholders

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Training of stakeholders				
2.1	Identification of target groups	2007	ROP/CEA, Private Sector	Target groups identified	
2.2	Resource development on training	2007	<b>MoE</b> /ROP, Private Sector	No of training programmes conducted	POPs project- consultant
2.3	Module preparation	2007-2008	ROP/CEA Pesticide Industry, Private Sector	prepared	
2.4	TOT programs	2008-2009	ROP/CEA, DOA, ITI, CEA, Pesticide Industry, Private Sector	Programmes conducted	
2.5	Awareness raising among stakeholders	From 2009	ROP/CEA, DOA, ITI, CEA, Pesticide Industry, Private Sector	Report of Feedback from Stakeholders	

# 3. Public awareness campaigns

Table 16 (f): Public awareness campaigns

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Public awareness campaigns				
3.1	Mass media programs	From 2007- 2008	ROP, CEA, MoH, DOA, ITI, Industry, Res. Institutions,NG Os, Private Sector	No of programs conducted	
3.2	Competitions, quiz programs	From 2007	ROP, CEA, MoH, DOA, ITI, Industry, Res. Institutions, MoEdu.,NGOs, Private Sector	No, in different media and reports	
3.3	Poster campaigns	From 2008	ROP, CEA, MoH, DOA, ITI, Industry, Res. Institutions,NG Os, Private Sector	No. of campaigns	
3.4	Inclusion in student curricula	2009	MoEdu, UGC.	Part of Syllabus	

# 4. Establishment of an information dissemination system

Table 16(g): Establishment of an information dissemination system

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4.	Establishment of an information	dissemination	on system		
4.1	Identification of reporting authorities	2007	ROP, ME	System in place	
4.2	Development of a reporting format	2008	ROP, ME	Format ready	
4.3	Establishment of a reporting protocol	2008	ROP, ME	Protocol ready	

# 3.3.6.3 Awareness on PCBs

# 3.3.6.3.1 Management Activities

- Upgrade the capabilities of Management task forces within stakeholder institutions
- 2. Awareness within the stakeholder organizations
- 3.Awareness of Chambers, BOI, IDB Ministry of Industries, Small and Medium Industries, recyclers
- 4.Awareness of Customs, ports authority, import & Export control, CEA and enforcement officers and laboratories.

# 3.3.6.3.2 Implementation strategy

# Upgrade the capabilities of management task force within stakeholder institutions

In order to control and manage PCB contaminated equipment, task force should be established and trained

Table 16 (h): Upgrade the capabilities of the management task force within stakeholder institutions

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Upgrade the capabilities of the	management	task force within	n stakeholder insti	tutions
1.1	Establishment of the	2007	MPE,	Established	
	Management Task Force		Stakeholders		
1.2	Formulation of training plan	2007	ME, MPE	Plan Ready	
1.3	Implementation	2007	ME,MPE,	Monitoring	
		onwards	stakeholders	reports	

# 2. Awareness within stakeholder organizations

Officers and workers should be trained by specially trained trainers (on operation and maintenance)

Table 16 (i) Awareness within stakeholder organizations

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Awareness within stakeholder	organizations	•		
2.1	Formulation of training plan	2007	CEA,	Plan	
			Stakeholders		
2.2	Preparation of training modules	2007	CEA,	Modules	
			stakeholders,		

			external institutions	
2.3	Training of trainers	2007	Stakeholders, external institutions	
2.4	Implementation	2007 - onwards	stakeholders	

# 3 Awareness of Chambers, BOI, IDB Ministry of Industries, Small and Medium Industries, recyclers

Small and medium scale Industrial sector (importers and recyclers) should be made aware of the issues through relevant institutions

Table 16 (j): Awareness of Chambers, BOI, IDB Ministry of Industries, Small and Medium Industries, recyclers

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Awareness of Chambers, BOI, recyclers	IDB Ministry	of Industries, S	mall and Medium	Industries,
3.1	Formulate awareness plan	2007	ME, relevant organization	Plan	
3.2	Implement plan	2007	Relevant organizations		

# 4.Awareness of BOI, Customs, ports authority, import & Export control, CEA, enforcement officers and laboratories – legislation, monitoring etc.

Enforcement officers should be educated in relevant institutions to enforce legal provisions

Table 16 (k): Awareness of Customs, Ports authority, Import and Export control, CEA,

Enforcement officers and laboratories

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4.	Awareness of Customs, Ports officers and laboratories	authority, In	nport and Expor	t control, CEA, E	nforcement
4.1	Formulation of the plan	2007	<b>ME</b> , relevant organizations	Plan	
4.2	Establish awareness training material	2007	ME	Training material	
4.3	Implement plan	2008 onwards	Relevant organizations		

# 3.3.6.4 Awareness on Unintentional by-products

# 3.3.6.4.1 Management Activities

- 1.Awareness on formation of unintentional by products and their impacts
- 2.Awareness on 3 Rs and waste prevention measures
- 3. Training on BAT& BEP

# 3.3.6.4.2 Implementation strategy

# 1. Awareness on formation of unintentional by products and their impacts on nature

Almost all sectors of the society are unaware of impacts due to PCDD/PCDF, although their normal life patterns are closely associated with activities producing them unintentionally. Therefore, awareness among all sectors of the society regarding PCDD/PCDF formation and its impacts on nature is a necessity. This will make the community to understand the importance of adopting relevant precautionary measures and techniques/ practices required to minimise/prevent PCDD/PCDF formation/release. These awareness programmes can be made enthusiastic by including topics such as mechanism of PCDD/PCDF formation, its chemical properties and its mode of transport etc.

Table 16 (I): Awareness on formation of unintentional by products and their impacts on nature

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Awareness on formation of unint	entional by p	roducts and the	ir impacts on natu	re
1.1	Relevant officers from government institution	2007	ME,CEA, BOI,Customs, MoH, NCPC	Increased support	
1.2	Industrialist	2007	CEA, Chambers	Increased support	
1.3	Environmental journalists & NGOs	2007	ME, CEA	Increased support	
1.4	School Teachers & student	2007	CEA	Increased support	
1.5	Conduct awareness programs through electronic and print media in all three languages	2007	<b>ME</b> , Private Sector	Increased support	
1.6	Conduct competitions /quiz programs/billboards, etc	2008	CEA, Private Sector	Increased support from society to implement relevant precautionary measures.	

# 2. Awareness on 3Rs and waste prevention measures.

Haphazard management/disposal of solid wastes is a major root cause for PCDD/PCDF formation and release. This situation is same for other countries too. Implementation of 3R practices will considerably reduce the quantity of solid waste and thereby will ease their proper management especially during disposal. Hence, introduction of 3R practices and waste prevention practices will prevent/minimise PCDD/PCDF release into the environment. Therefore, awareness of 3R practices among all sectors of the society is a necessity and effective implementation of such practices can be encouraged by introducing incentives and national award schemes to those who are implementing 3R practices.

Table 16 (m): Awareness on 3Rs and waste prevention measures.

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	Awareness on 3Rs and waste p	revention mea	sures.		
2.1	Identify target groups	2007	CEA, BOI, MLG, MoH, WMA, NCPC, ITI , Private Sector		
2.2	Organize awareness campaign	On going	CEA, Bol, MLG, MoH, WMA, NCPC, ITI, Private Sector	Number of campaigns	
2.3	Organized national award for selected categories	2007	CEA, Chambers, Private Sector	Annual awards	
2.4	Identify existing best practices and disseminate to the relevant parties	2007	CEA, ITI, NCPC, Private Sector	3RS	
2.5	Involve NGOs	On going	CEA	Reduction in material requiring disposal	

# 3. Training on BAT & BEP

Although resources for BAT/BEP are made available, their implementation will not be successful without technical know how. Hence, capacity building of those personnel engaged in unintentional byproducts producing activities in the field of BAT/BEP implementation is a necessity.

Table 16 (n): Training on BAT & BEP

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Training on BAT & BEP				
3.1	Capacity building of BAT & BEP on identified unintended by product	2007-8	CEA, Bol, ME, MLG, MoH, WMA, NCPC, ITI	Effective implementation of BAT/BEP	

# 3.3.6.5 Monitoring

# 3.3.6.5.1 Management Activities

- 1.Introduction of the issue of POPs to educational curricula
- 2.In service training of relevant officials
- 3. Media campaigns
- 4. Community based IEC (Health Education) activities

# 3.3.6.5.2 Implementation Strategy

# 1. Introduction of the issue of POPs to educational curricula

Table 16 (o): Introduction of the issue of POPs to educational curricula

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
1.	Introduction of the issue of POP	s to education	onal curricula		
1.1	Induction of relevant authorities/agencies	2007-8	ME	No. of awareness programs held	
1.1	Identification of relevant curricula	2007-8	Relevant Ministries/ME	Lists of curricula	
1.2	Inclusion of the issue of POPs in identified curricula	2008	Relevant Ministries/ME	Revised curricula	

# 2. In service training of relevant officials

Table 16 (p): In service training of relevant officials

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
2.	In service training of relevant o	fficials			
2.1	Induction of relevant authorities/agencies	2007	CEA	No. awareness programmes held	
2.2	Identification of groups of officials to be trained	2007	Relevant Ministries/ME	List of relevant officials	
2.3	Development of training modules	2007	<b>ME</b> /Relevant Ministries/NIE, SLIDA	Training modules	
2.4	Training of trainers	2007	Relevant Ministries/ME SLIDA	Training programme for trainers	

2.4	Conduct of training programs	2007-2008	ME/CEA	No. of training	
				programmes	

# 3. Media campaigns

# Table 16 (q): Media campaigns

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
3.	Media campaigns				
3.1	Radio Programs	2007	<b>CEA</b> , Private Sector	No. awareness programmes held	
3.2	TV programme	2007	Relevant Ministries/ME Private Sector	List of relevant officials	
3.3	Print Media	2007	<b>ME</b> /Relevant Ministries/NIE, Private Sector	Training curricula	
3.4	Bill Board/	2007	<b>ME</b> /CEA, Private Sector	No. of training programmes	

# 4. Community based IEC (Health Education) activities

Table 16 (r): Community based IEC (Health Education) activities

	Management option / Activities	Timeframe	Responsible / supporting Institution(s)	Requested output / indicator of success	Related activities/ projects/ issues
0	1	2	3	4	5
4.	Community based IEC (Hea	Ith Education	n) activities		
4.1	Prepare Awareness Programmes and conduct same	2007	ME, MOH	No. awareness programmes held	
4.2	Identify officials to be trained	2007	Relevant Ministries/ME	List of relevant officials	
4.3	Develop Curricular	2008	ME/Relevant Ministries/NIE/ University Medical schools – community medicine streams	Training curricula	
4.4	Conduct Training Programmes	2008	ME/CEA, MoH, PHIs	No. of training programmes	

Chapter

4

# 4.0 CAPACITY BUILDING PROPOSALS AND PRIORITIES

Current capacity and capability available in Sri Lanka needs to be strengthened to achieve the objectives of the NIP. Priorities based on the need to meet Convention obligations and country priority issues are highlighted for the particular priority areas. Details on the capacity building and development proposals are included in the particular action plans:

# 4.1 INSTITUTIONAL AND REGULATORY FRAMEWORK:

- Strengthening & networking relevant institutions including provincial agencies;
- Upgrade human resources in policy and legal issues related to chemical management, including POPs;
- Strengthen capacity in risk assessment and management;
- Data collection, evaluation & management;
- Develop/upgrade systems including norms and guidelines, facilities and support services for proper management of chemicals, including POPs, through their life cycle in order to minimize health & environmental impacts;
- Set up research priorities.

# 4.1.1 POPS PESTICIDES

- Strengthening of laboratory analytical facilities and training capacities;
- Development of expertise on analytical instrumentation, risk assessment and environmental modelling;
- Infrastructure development on communication, networking and mobility.

# 4.1.2 PCBS AND EQUIPMENT CONTAINING PCBS

- Awareness for all stakeholder institutions policy, enforcement, testing, operational, maintenance levels;
- Equipment for testing;
- Establish inventories and database;
- Guidance manuals and guidelines on decontamination/disposal;
- BAT/BEP for stakeholders;

Resources for management up to and including final elimination.

### 4.1.3. UNINTENTIONALLY PRODUCED BY-PRODUCTS

- Develop capacity on sampling and testing including equipments (D/F);
- Develop capacity on analysis of air emissions of HCl, Cl, VOC, SOx, NOx;
- Skills development on assessment of pollutants in differences processes for regulatory bodies;
- Develop and implement pilot projects on integrated waste management system for selected local authority;
- Development of environmentally sound technologies for cottage industries (metal recycling, lime kilns, brick & tile kilns;)
- Best Available Technology & Best Environment Practices.

### 4.1.4 MONITORING

- Strengthening the existing expertise and facilities;
- Strengthening the supporting infrastructure for monitoring;
- Ensuring operational expenditure for regular monitoring;
- Coordination and sharing of information among stakeholders effective monitoring.

# 4.2 RESOURCE MOBILISATION STRATEGY

The action plans in this NIP stipulates specialised needs for specific activities under each prioritised issue. Costing for same has been indicated considering requirements of Local and Foreign expertise, Equipment, disposal and treatment facilities. Human, Capital and Operational Costs have been quantified and mentioned separately in this NIP. The Costs in US Dollars for the different activities over a three, six and over six year periods are as follows:

TABLE 17: COST ESTIMATES FOR IMPLEMENTATION OF ACTION PLANS

Period		E	stimated Costs in	US\$	
renou	Pesticides	PCBs	Unintended Releases	Monitoring	Management
Short Term (Three Years) 2007-2009	1,583,320	1,591,150	1,402,100	917,400	1,407,400
Medium Term (Six Years) Including Continuation of short term activities up to year 2012	2,407,100	1,979,800	7,005,300	805,600	7,194,500
Long Term –including Continuation of Medium Term Activities up to 2016	291,100	845,200	177,604	511,200	211,204
Total Estimated up to 2016	4,281,520	4,416,150	8,585,004	2,234,200	8,813,104

TABLE 18: TOTAL COSTS FOR SHORT, MEDIUM AND LONG TERM ACTIVITIES

Period	Estimated Costs in US \$
Short Term (Three Years) 2007-2009	6,901,370
Medium Term (Six Years) Continuation of short term activities included up to year 2012	19,392,300
Long Term – Continuation of Medium Term Activities included up to 2016	2,036,307
Total Estimated up to 2016	28,329,977

For the three year period from 2007 to 2009 approximately US \$ 7.0 Million is required for short term activities. A six year term from 2007 to 2012 for continuation of short term activities and additional activities would require a further US \$ 19.4 million. For continuation of medium term activities and additional long term activities up to the year 2016 would require a further US \$ 2 million. Thus a total of US \$ 28.329 million is estimated to be needed up to the year 2016 for all activities related to management and control of POPs in Sri Lanka scheduled to commence in 2007.

While a high input of local funds may be available, through the annual budgets of the Ministry of Environment and other Ministries and government agencies, the major funding has to be from external sources. It is estimated that approximately 30 % of the funding estimates would be in-kind contributions of state resources such as the services of permanent staff, office space, equipment and services.. In addition to that, allocations will be made available from the government budget for implementation of the NIP based on the availability of funds; The government has already allocated US\$ 130,000 to the Ministry of Environment directly for POPs implementation activities in 2007.

Following tables provide a summary of the timeframe, resource assessment and proposed sources of funding of the NIP-Action Plans, as well as of the supporting research and development activities.

With regard to the timing the following is considered:

**Short-term activities**: to be implemented within 3 years

**Medium-term activities** to be implemented in the framework of 3-6

years

**Long term activities** to be implemented in the framework over 6

vears

With regard to assessment of cost necessary for implementation the following is considered:

Low costs mostly human costs (predominantly from governmental offices) operation costs to

run the offices; no capital costs.

**Medium costs** human costs (partly governmental officers, partly consultants/experts); operation

costs to run the offices / laboratories and purchase in-country services; capital

costs up to 0.5 mil USD.

**High costs** human costs (governmental officers, consultants/experts, managers, workers);

operation costs to run facilities; to purchase services overseas; capital costs over

0.5 mil USD.

With regard to sources of financing the following is considered:

State budget usual budget of the governmental institutions as well as additional budget

earmarked for a particular purpose.

**Private sector** any input from the concerned private sector.

Expatriate donors funding from international donors (e.g. GEF, World Bank) or bi-lateral funding (e.g.

JICA).

Though single cost items are presented there will be supporting funds made available through GOSL programs. While a high input of local funds may be available, through the annual budgets of the Ministry of Environment and other Ministries and government agencies, the major funding has to be from external sources. It is estimated that approximately 30 % of the funding estimates would be in-kind contributions of state resources such as the services of permanent staff, office space, equipment and services. There is a significant component matched through 'in kind' funds – recurrent costs on staff, transport, building and floor space etc. The Government has already allocated US\$ 130,000 directly for POPs implementation activities in 2007.

4.3 SUMMARY OF THE TIMEFRAME, RESOURCE ASSESSMENT AND PROPOSED SOURCES OF FUNDING OF THE NIP-ACTION PLANS

ACTION PLANS		TIMEFRAME	 AS	ASSESSED COSTS	STS	Sour	SOURCES OF FINANCING	ANCING
	4.040	Modi:		Medium	42:11	Ctoto		100000
AP: Institutional and Regulatory Strengthening Measures	SHORE	Medium	A0	Medium	_ 6 E	orale	LINAIG	External
Formulating regulation under NEA on management, handling, phase out and disposal of PCBs and PCBs containing equipment								
Establish legislation on setting up of new foreign investment projects related to POPs Chemicals								
Legislation requiring the use of BAT/BEP for new installations and upgrading the existing systems								
Identification of contaminated sites and development of a de-contamination programme								
Strengthening of monitoring and institutional capacities								
Hazardous chemical management including POPs								
AP: POPs pesticides								
Improvement of pesticide regulatory system to adequately address the specific issues								
Mechanism to minimise accumulation and safe disposal of outdated pesticides, at all levels								
Development and implementation of proper information gathering and dissemination system								
Monitoring and surveillance of environmental and human health effects								
AP: PCBs and equipment containing PCBs								
Develop and put in place legislation for PCB Management								
Establish full inventory of PCB equipment								
Establish procedures for equipment maintenance								
Establish appropriable PCBs laboratory facilities								
Develop and implement guidelines for phase out, transportation, storage, and disposal of PCBs equipment/								

ACTION PLANS		TIMEFRAME		ASS	ASSESSED COSTS	STS	Sourc	SOURCES OF FINANCING	ANCING
	Short	Medium	Long	Low	Medium	High	State	Private	External
Establish progress monitoring mechanisms									
Capacity building for control and management of PCBs									
Disposal of existing stocks and stockpiles									
Rehabilitation and decontamination of contaminated									
AP: Unintentionally produced POPs			l			l	l		
Implement into legislation BAT/BEP requirement for									
new sources									
Review & upgrade relevant legislation/s on solid waste management									
Implementation of proper solid waste management/disposal mechanism									
Implementation of proper medical wastes disposal techniques									
Review existing technology on secondary metal recycling plants, and identify necessary changes for upgrading									
Review existing crematories designs for their acceptance and identify changes									
AP: Monitoring									
To mobilise resources for monitoring									
To monitor POPs in the environment									
To monitor POPs in imported food									
To monitor POPs in exposed populations									
AP: Awareness raising and information dissemination									
Public awareness about the regulations through print and electronic media.									
Seminar/workshop among stakeholders on compliance requirements for Stockholm Convention									
Web Site for Sri Lanka NIP									
Development and implementation of proper information									

ACTION PLANS		TIMEFRAME		Ass	ASSESSED COSTS	STS	Sour	SOURCES OF FINANCING	NCING
	Short	Medium	Long	row	Medium	High	State	Private	External
gathering									
Training of stakeholders									
Public awareness campaigns									
Establishment of an information dissemination system									
Upgrade the capabilities of PCB management task forces within stakeholder institutions									
Awareness within the stakeholder organizations									
Awareness of Chambers, BOI, IDB Ministry of Industries									
Awareness of Customs, ports authority, import & Export control, CEA and enforcement officers									
Awareness on formation of unintentional by products and their impacts on nature									
Awareness on 3 Rs and waste prevention measures									
Training on BAT &BEP									
Introduction of the issue of POPs to educational curricula									
In service training of relevant officials									
Media campaigns									
Community based IEC (Health Education) activities									

4.4 SUMMARY OF THE TIMEFRAME, RESOURCE ASSESSMENT AND PROPOSED SOURCES OF FUNDING OF THE NIP-SUPPORTING RESEARCH AND DEVELOPMENT ACTIVITIES

RESEARCH AND DEVELOPMENT ACTIVITY		TIMEFRAME		As	Assessed costs	STS	Sour	SOURCES OF FINANCING	ANCING
	Short	Medium	Long	Low	Medium	High	State	Private	External
R&D in support of AP on legal and institutional strengthening									
Promote Research and Development in alternative technologies									
Evaluation of PTS for candidate POPs									
Improve pesticide regulatory system									
Review and upgrade relevant legislation on solid waste management									
R&D in support of AP on POPs pesticides									
Study of possible correlation of environmental levels and adverse impacts									
Study of environmental impact indicators									
Fate and effects modelling									
R&D in support of AP on PCBs									
R&D on PCB disposal technologies									
R&D on containment and decontamination of sites									
Research for preventing cross contamination									
Research on health/environmental effects due to PCB exposure									
R&D in support of AP on unintentionally produced POPs									
Development of emission factor for production of charcoal (Coconut shell).									
Investigate unintentional by products & AOX in leachate and soil in the contaminated open dump site (Bloemendal)									
Investigation of contamination of animal milk and human milk in the scavenging animals and people living close vicinity to the dump sites									
Research on recycling potential for flammable material									

RESEARCH AND DEVELOPMENT ACTIVITY	-	TIMEFRAME		AS	ASSESSED COSTS	STS	Sour	SOURCES OF FINANCING	NCING
	Short	Medium Long	Long	Low	Medium High	High	State	Private External	External
Assessment of unintentional by products in process									
sludge / air emission and treatment of sludge in BOI									
plants & smelting plants									
Assessment of unintentional by products in the soil									
contaminated from the waste water and sludge releases									
from service stations									
Life cycle assessment of PVC materials used									
Risk assessment on use of biomass for cooking									
R&D in support of AP on monitoring									
Identification of low-cost methods for monitoring									

# ANNEX I

### COMMUNICATIONS AND REPORTING OBLIGATIONS UNDER THE STOCKHOLM CONVENTION

This annexure details the various reporting requirements of the Stockholm Convention and the connected responsible agencies and institutions.

Parties are required to facilitate or undertake the exchange of information detailed in paragraph 1 of Article 9. This information shall be exchanged directly or through the Convention Secretariat. In addition parties are also required to designate a national focal point for the exchange of such information.

Parties are also required, pursuant to Article 15, to report to the Conference of the Parties on the measures they have taken to implement the provisions of the Convention and on the effectiveness of such measures in meeting the objectives of the Convention. Such reporting shall be at periodic intervals and in a format to be decided by the Conference of the Parties at its first meeting.

The national focal point designated under Article 9 of Convention, has the primary responsibility for the submission of the national report to the Secretariat of the Convention. Other departments and national institutions that are responsible for implementing aspects of the Convention, will be responsible to provide to the national focal point, the relevant information required in order for the Party to comply with its reporting obligation.

# Reporting obligations under the Stockholm Convention and the strategy of information exchange and reporting in Sri Lanka

CONVENTION OBLIGATION	DESCRIPTION OF REQUIREMENT	PERIODICITY	RESPONSIBLE INSTITUTION
Article 5, sub paragraph (a) Measures to reduce or eliminate releases from unintentional production	Requires each Party to develop an action plan, or, where appropriate, a regional or subregional action plan, and subsequently to implement it as part of its national implementation plan specified in article 7, designed to identify, characterize and address the release of the chemicals listed in Annex C of the Convention.	Within two years of the date in which the Convention enters into force for that Party	ME with the assistance of relevant stakeholders
Article 5, subparagraph (a) (v): Measures to reduce or eliminate releases from unintentional production	A review to be undertaken of those strategies pursuant to the development of an action plan to identify, characterize and address the release of the unintentionally produced persistent organic pollutants listed in Annex C, and of their success.	Every five years	ME, ITI, CEA, BOI with the assistance of FD, AD, WL, MLG, CEB & Plantation Sector
Article 7: Implementation plans	Requires each Party to develop and endeavour to implement an implementation plan and transmit it to the Conference of the Parties, and requires each Party to review and update its plan on a periodic basis and in a manner to be specified in a decision of the Conference of the Parties.	Transmission to the Conference of the Parties within two years of the date on which the Convention enters into force for that Party.	ME with the assistance of other implementation Agencies
Article 15: Reporting	Each Party shall report to the Conference of the Parties on the measures it has taken to implement the provisions of the Convention and on the effectiveness of such measures in meeting the objectives of the Convention. Each Party shall provide to the Secretariat: (a) Statistical data on its total quantities of production, import and export of each of the chemicals listed in Annex A and Annex B or a reasonable estimate of such data; and (b) To the extent practicable, a list of the States from which it has imported each such substance and the States to which it has exported each such substance.	To be decided by the Conference of the Parties.	Customs, BOI, Dept of Import and Export, Ministry of Industries, Ministry of Trade & Commerce, CEA
Annex A, Part II Subparagraph (g)	Requires each Party to provide a report every five years on progress in eliminating polychlorinated biphenyls and submit it to the Conference of the Parties pursuant to Article 15	Every 5 years	Use and elimination – CEB, LECO, LTL, industries, any other users report to SC focal point

CONVENTION OBLIGATION	DESCRIPTION OF REQUIREMENT	PERIODICITY	RESPONSIBLE INSTITUTION
Annex B, Part II, paragraph 4	Each Party that uses DDT is required to provide to the Secretariat information on the amount used, the conditions of such use and its	Every 3 years	DDT is not used in Sri Lanka.
	relevance to that Party's disease management strategy in a format to be decided by the Conference of the Parties in consultation with the World Health Organization.		
Article 4, paragraph 6	A Party that requests an extension of a specific exemption is required to submit a report to the Secretariat justifying its continued need for	Before the expiration of the specific exemption	No specific exemptions are
	registration of that exemption.	(five years after the entry into force of the	required by Sri Lanka
		Convention for that POP)	

# **ANNEX II**

# Socio – Economic issues of POPs Management, Control and Final Elimination.

Ministry of Environment , Sri Lanka

December 2006

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**Abbreviations used** 

BAT - Best Available Techniques
BEP - Best environment practices
BET - Best environment technologies.

BHC Benzene Hexachloride CB Central Bank of Sri Lanka CEA **Central Environment Authority** CEB Ceylon Electricity Board CRI Coconut Research Institute DDT Dichlorodiphenyltrichloroethane DOA Department of Agriculture Gas Chromatography GC

GEN AUX - Generation Auxiliary Transformers

HS - Harmonized System

IPM - Integrated Pest Management
ITI - Industrial Technology Institute
I-TEQ - International Toxic Equivalent
LECO - Lanka Electricity Board
LTL - Lanka Transformer Limited
MRI - Medical Research Institute

MENR - Ministry of Environment & Natural Resources

MPE - Ministry of Power and Energy

MW - Mega watt

NEP National environment policy NIP National implementation plan Polybrominated biphenyls PBB Polychlorinated biphenyls PCB PCDD -Polychlorinated dibenzo dioxin Polychlorinated dibenzo furans PCDF -POPs -Persistent Organic Pollutants Registrar of Pesticides ROP -Special Import License SIL -

UNEP - United Nations Environment Program

WHO - World Health Organization.

Socio-economic issues on POPs management, control and final elimination.

Even though the impacts of persistent organic pollutants are more or less similar, their use, impacts and control measures differ significantly and hence cannot be reviewed together. POP pesticides had its use in the agriculture sector, domestic sector, in industrial pest control and in vector control by health authorities. Industrially produced POPs such as PCB is used in the power and energy sector.

# 1. Characterization of problems leading to POPs use.

### 1.1 POPs Pesticides use

(i) Dominance of small agricultural holdings and the need to use high levels of agricultural inputs to achieve high output from agriculture to earn a living from agriculture;

The average size of an agricultural land holdings size is below one hectare and therefore, to obtain adequate income from these land parcels, farmers have to use increased amounts of inputs such as chemical fertilizer and pesticides. For example, with these efforts the yield per hectare of paddy has increased to 4.05 tons by the cropping year 2004/2005, which is one of the highest yield levels in South East Asia. According to Department of Census Statistics 74% of the paddy farmers use insecticides and almost 80% of the farmers used herbicides for weed control in the same cropping year.

(ii) Increased incidence of pest attacks with the introduction of high yielding crop cultivars;

High yielding crop varieties show significant yield responses to increased use of inputs such as chemical fertilizer. Subsidies for chemicals fertilizer was available further promoting their use. The higher emphasis given for nitrogen fertilizer promoted use of nitrogen fertilizer in particular, which made plants more succulent and making them more susceptible to pest attack. The traditional systems of pest control favoring biological control could not provide a solution to increased pest attacks with high yielding varieties of crops. Hence farmers had to rely on chemical methods of pest control.

(iii) Introduction of POPs pesticides almost coincided with the `green revolution' in agriculture in 1960's in developing countries;

POPs pesticides had been introduced to Sri Lanka around 1960 and provided an answer to emerging enhanced pest problems in the country at that time. The POP pesticides were relatively cheap pesticides that farmers could afford and also had broad spectrum effect on pests. And their persistence in the environment further enhanced effectiveness in pest control over a longer period. Non adoption of good agricultural practices such as crop rotation systems by some farmers aggravated the pest problem as pests attacking one type of crop multiply rapidly under mono-crop systems.

(iv) Familiarity with POPs pesticides by farmers;

Even though the POPs pesticides had been banned one by one over the period 1970 to 1994 in Sri Lanka, farmers are aware of the effectiveness in control of pests in agriculture. Therefore, given the opportunity some farmers may revert to use of POPs pesticides.

(v) High level of sales promotion by pesticide trade and the recommendation to use pesticide as a preventive measure, rather than as a control measure of pesticides;

At present there about 5000 authorized retailers of pesticides in the country, having close contacts with farmers. Farmers tend to get advice from retailers regarding the pesticide use because of the inadequacy of trained agricultural instructors in the agriculture sector at the field level. Often, the general advice given is to use pesticides as a preventive measure rather than a control measure. Therefore, regular application of pesticides takes place at field level involving several applications at regular intervals. This implies high volume of pesticide application at a considerable cost farmer. Furthermore, importers provide high commissions to retailers compared to other trades, and this helps sales promotion substantially through various programs.

# (vi) Illegal entry;

Even though all POPs pesticides had been legally banned there is a possibility of illegal entry through various means. Smuggling from India where POPs pesticides such as DDT is still used in vector control, incorrect classification at customs, adulteration with imported formulations are some possible avenues for illegal entry.

(vi) Unhealthy practices and abuse in pesticide use by some farmers;

Fields studies have shown that some farmers resort to unhealthy practices in pesticide use leading to occupational exposure. Application of pesticides without protective gear, over use, harvesting of crop produce before the natural decomposition of pesticides are some of these problems.

(vii) Need to extend `Integrated pest management' (IPM) practices to other crops and other farmers;

Some paddy farmers had received training in IPM practices and adopted these practices. This had been a successful program in curtailing pesticide use and farmers have reduced pesticide application and made substantial savings on cost of pesticides. But this program needs to be extended to other farmers who have hitherto not adopted this practice and also to other crops such as vegetables where pesticides are used widely.

(viii) Need for vector control, for elimination of diseases such as malaria, dengue, filarial;

Sri Lanka being a humid tropical country, mosquito infestation is high. This problem is further aggravated due to unhealthy practices of the general public, water logged conditions in low lying areas, retention of irrigated water in paddy fields etc. Large quantities of DDT had been used in malaria infested areas in the dry zone and some parts of wet zone over a number of years before banning. There is a high possibility of the residue remaining in all environment compartments and the limited studies on this subject confirm the presence of DDT even in the sea bed. Build up of resistance to DDT by some mosquito larvae also was a problem.

(ix) Difficulties in preservation of wood in domestic use and in the industry;

Under the warm and humid conditions of whether in Sri Lanka the pest attacks on wood products is high. For control of insects and rodents attacking wood and wood products, highly toxic pesticides need to be used. In order improve the durability of wood products pesticides with long lasting properties are used. If these pest are not controlled the economic loss from pest damage can be very high.

# 1.2 Problems leading to use of Industrial POPs;

Industrial POPs had been intentionally produced without the initial knowledge of their harmful effects. Now, the harmful effects are known but the equipment containing industrial POPs are still in use. In the context of Sri Lanka, PCBs are the most important industrial POP that needs consideration in elimination.

# (i) Long life span of PCBs containing equipments;

The life span of PCB containing equipment such as transformers is about 30 to 35 years. Equipments procured before official termination (1986) of import of PCB containing transformers are still in use.

## (ii) High cost of replacement of PCBs containing equipments;

Due to high cost of replacement, organizations using them tend to get the maximum operational use out of such equipments. The period of operational use may some times exceed the declared life span of the equipments. The inventory study indicates that some equipment that had passed the expected life span is still in use. It would be economical for any organization to use them even after the equipment reaches the scrap value after reaching zero depreciated value, provided they are in good operational condition.

# (iii) Lack of legislation to prevent import of PCB containing equipments;

Unlike for POPs pesticides, the PCBs have no legislation dedicated to them to prevent imports and use. Therefore, in the event of import of PCBs, no penalties could be imposed.

# (iv) Weaknesses in the procurement systems to prevent import of PCB contaminated equipments;

There is no requirement for obtaining a `PCB free certificate' from the supplier or manufacturer at the time of procurement of equipments containing dielectric oils or in the import of dielectric oils. Therefore, the status of PCB contamination is unknown unless tests are done to detect them. Also, when equipments are imported age of equipments are not considered as a important criteria. Thus when procurements are made through the tender procedure old equipments with PCB contamination may be offered at low prices, and it is difficult to reject such offers, if relevant clauses are not included in the tender conditions.

### (v) Lack of facilities in testing for PCBs;

There are no adequate testing facilities to detect presence of PCB in equipments that may contain them. Even if PCB free certificates are provided it would not be a guarantee, unless tests are carried to detect them.

### (vi) Recycling of transformers without testing for presence of PCBs;

Recycling is a environment friendly activity. However, issue of transformers for recycling without testing for PCBs is a problem. If these equipments are PCB contaminated, there could be a series of contaminations at various stages of the recycling process.

# (vii) Closed systems using dielectric oils can be a future source of PCB contamination;

When closed systems for dielectric oils such as capacitors and electrical switch gear are discarded out of use, they can become sources of contamination in future. Lack of an inventory of these items in the country further aggravates the problem.

# 1.3 Problems leading to use of unintentionally produced POPs – Dioxins and Furans.

Unintentionally produced POPs do not have any use, but are unwanted bi-products of certain combustion and chemical processes. With the discontinuation of use of chlorine in paper mills the

problems of dioxins and furans derived mainly from incomplete combustion. The unintentional emissions of dioxins and furans are a major source of environment pollution.

### (i) Improper solid waste management;

Improper solid waste management by local authorities and the general public is major problem, which often lead to dumping of waste in dump yards. This waste is mixture of both bio-degradable and non bio-degradable substances. The bio-degradable substances continue to decompose in dump yards and leachate percolate down to soil, but non bio-degradable substances such as polythene and plastics catch fire due to methane emissions or due to human activities. This results in release of dioxins and furans. If solid waste is managed properly, these emissions can be reduced.

# (ii) Improper medical waste incineration;

In some medical institutions medical waste is incinerated by incomplete combustion processes and some institutions dispose medical waste through local authorities. Both these practices are not satisfactory and therefore, improvements should be done in the incineration process.

## (iii) Unimproved production technologies with traditional industries;

Traditional industries such as ferrous and non-ferrous metal extraction, extraction of copper from scrap copper emit dioxins and furans as a result of incomplete combustion. Cost of adoption of new technologies also may be a problem for particularly for the cottage type industries; wherein capital investment is a constraint.

# (iv) Use of heavy oils in thermal power generation plants;

Use of heavy oils in some thermal power generation plants also leads to emissions dioxins and furans.

### (v) Incomplete burning in the use of bio-mass as a fuel;

Bio-mass provides about 50 percent of the primary energy in the country, with major bio-mass sources such as fuel wood, rice husk, coconut shells etc. The processes involved in bio-mass combustion are cooking, lime production, brick production etc. Incomplete burning results in emissions of dioxins and furans.

# (vi) Uncontrolled burning of forests;

In forest, scrub jungle fires and in cultivation of chena, burning take place under uncontrolled conditions and this leads to emission of dioxins and furans. Such burning occurs due to acts of vandalism or due to illegal activities.

# (vii) Crematoria;

Use of crematoria is a traditional practice of both Buddhists and Hindus. Emissions are there from crematoria due to incomplete combustion. Improvements have to be made in the present incineration process.

# 2. Characterization of the impacts of using POPs;

### A. Impacts on humans;

# (i) Impacts leading to health hazards on humans;

The health impacts on humans can be short term or long term. The short term impact includes poisoning, irritations in skin, eyes, and in mucus membranes. The long term impacts are carcinogenic effects, immunological effects, endocrine disruption by some POPs, neurological effects, effects on reproductive system etc.

## (ii) Secondary impacts due to health hazards;

High expenditure on health treatment.

- Shortening of the life span.
- Loss of quality of life due to immunological effects, endocrine disruption and neurological effects.
- Reproductive problems leading to complication.
- Severe health problems due to occupational and accidental exposure.

## (iii) Impacts on occupation and productivity;

- Loss of productivity and lowering of work efficiency.
- Increased sick leave and early retirement of trained and skilled workers.
- Need for appointment and training of new workers take the place of casualties.

## (iv) Impacts on accidental exposure.

- Payment of compensation.
- Human suffering.

# (v) Impacts due to long term persistence in the environment

- Accumulation of POPs in fatty tissues of the body therby bringing about various health hazards later on.
- Deposition of POPs residues on food substances and ingestion leading to bioaccumulation.
- (vi) Major source of poisons for self harming attempts; for example POP pesticides.

# **B.** Impacts on the environment;

- (i) Biological hazards to wild life include;
  - Birth defects.
  - Lowering of survival rate.
  - Dysfunctional immune and reproductive systems.
  - Extinction of species and loss of bio-diversity.
- (ii) Pollution of all environment compartments, trans-boundary movement of POPs resulting in wide spread impacts all over the globe, thereby increasing the potential for hazards.
- (iii) Continuity of environment hazards over a long period of time due to their persistence.
- (iv) Entry to the food chain of wild life and ending up in large animals such as mammals causing them various hazards leading to reduction in their numbers.
- An assessment of the social and economic values of activities producing or POPs contribution to GDP, to public health improvement, impact on human health and environment.

There had been no intentional production of POPs in Sri Lanka. All POP pesticides and industrially produced POPs had been past imports to the country. Lack of quantitative information on impacts of POPs is serous problem in computing social and economic costs. Moreover, there are no correlation studies made regarding POPs contamination and their impacts in Sri Lanka. All POPs pesticides had been banned some ten years back and their residues can be expected in various environment compartments. Even though there had been use of POPs in the past decade, there had been a simultaneous improvement in the health related indices during corresponding period due to general improvement in the health standards including various immunization programs, control of malaria etc For example the life expectancy as increased from 46 years in 1946 to 73 years by the year 1991 in the country. Under these circumstances and attempt was made to develop some values using latest available health statistics (2002) with some reasonable assumptions. Following methodology was used in this regard.

Various indices related to the annual health situation in the country are presented in the National Health Bulletin of the Dept. of Health Services. The identified health impacts due to POPs are; toxic effects, diseases in the liver, endocrine system, nervous system etc. From these indices total number of people affected for the whole population for the particular year was assessed. The total expenditure on health expenditure was apportioned among in patient and out patients on percent ratio of 80 to 20 and the expenditure on health for treatment was computed. According to the inventory study on POPs pesticides, it reveals that 80 percent of the people contaminated with pesticides does not obtain treatment from the hospitals. Their health cost was assumed to be half the health cost of out patients from hospitals. Since no estimate was available on health impacts from POPs, three levels of impacts due to pesticides, that is at 10%, 20% and 30% were assumed; the moderate level assumed was 20%.

The inventory study on PCB provides cost estimate foe disposal of PCB oil and the cost on disposal of PCB contaminated transformers. Accordingly, there annual total costs were also assessed.

# Impact of POPs on health;

	Percent level o	f patients due to 20%	<u>POPs *</u> 30%
Estimated health cost.(Rs. million)	87.52	175.04	262.56
Adjustment for untreated patients	3.70	7.40	11.10
Total annual cost (Rs. million)	91.22	182.44	273.66
As a percent of GDP (2002)	0.0057	0.012	0.017

<sup>\*</sup> Hospitalized patients were considered as in patients.

The above data provide some estimated health cost related to hazards from POPs. Since POPs pesticides are banned it may reflect the effect due to residues in the environment and quantities accumulated in fatty tissues. Since, there are no quantitative assessments available on health hazards, above information may be some what arbitrary. The social cost cannot be estimated due absence relevant information.

An estimated cost on disposal of PCB contaminated transformers and transformer oil based on cost factors indicated in the inventory study is furnished below.

Estimated number of PCB contaminated transformers - 1060

Cost of replacement of PCB contaminated transformers (  $1060 \times 20,000$ ) = US \$ 21.20 million or Rs. 2162.4 million ( 1US \$ = SLRs. 102) As a percent of GDP (2005) it is 0.035 percent.

However, the disposal process would be spread over number of years. Therefore, the annual cost would have to be divided among those years. Since, the replacement cost of transformers is fairly high, an alternative would be to dispose them at the end of the expiry date of transformers and to avoid any possible contaminations during this period.

The estimated quantity of PCB contaminated transformer oil is 2292 tons. Therefore the cost of replacing transformer oil is (2295 x 3500) US \$ 8.022 million or SLRs. 818.24 million, which is 0.035 percent of GDP in 2005.

# 4. An analysis of alternative management options such as regulations, replacement, stakeholder involvement.

# 4.1 POPs Pesticides:

The introduction of the Control of Pesticide Act no. 33 of 1980 followed by the Control of Pesticides (Amended) Act No.6 of 1994 provided the legal requirement dedicated to control of pesticides in Sri Lanka. This Act provides the Registrar of Pesticides the authority for registration of pesticides, approval of labels and containers, prohibition of sale of adulterated, decomposed or deteriorated products, prevent contamination of food products, prevention of contamination of food stuffs in storage, transport and sale, regulation of imports, regulation of advertisements, bulk storage and to oversee the time period after harvest after last pesticide application. This provides adequate legislation to control POPs pesticides as well.

All POPs pesticides had been banned during the period 1970 to 1994. Furthermore, entry of POPs into the country is contained by a system of control involving coordination with authorities responsible for control of import/export and the Customs Department under the provisions of Import and export Law and the Customs Ordinance. It is mandatory for hazardous chemicals including pesticides to obtain 'Special import license' (SIL) for import from the Controller of Imports and Exports. Approval of the registering authority is required for this purpose.

All POPs pesticides had been replaced by better alternative substitutes and therefore, it can be considered that POPs pesticides now have no opportunity cost. Although chemical pesticides are not produced in Sri Lanka, there were 179 approved pesticides formulations in the market in the year 2002. Even though this is not a static figure, due to in and out of pesticides from the registry or the market; this indicates that an adequate number of pesticide formulations are available in the country to deal with the pest problem. But the problems remains that the present capacity of Registrar of Pesticides is not sufficient in terms of improved laboratory facilities to identify POP pesticide contaminations and also the availability of trained man power for implementation of its duties.

# 4.2. Intentionally produced POPs – PCBs;

In the past PCBs had been imported as a dielectric fluid for the power and energy sector. Even after identification of its POPs characteristics, it is continued to be used in the power and energy sector because of the long life span of the electrical equipments using it and also as the replacement cost is very high. Because of these reasons there is an opportunity cost associated with PCBs until they are disposed. Producing countries have stopped producing PCBs some twenty years back and Sri Lanka had discontinued official import of PCB containing equipments since 1986. Better alternative dielectric fluids are now used in the sector. But there is no legal ban on import of PCBs.

As correctly listed under NIP; the present management options of PCBs involving introduction of legislation for management and prevention of new entry, establishment of the full inventory of equipments containing PCBs, establishment of procedures for maintenance of equipment, establishment of PCB laboratory facilities, establishment of and implementation of guidelines for phase out, transport, storage, disposal, progress monitoring, capacity building for control and management of PCBs, disposal of existing stocks and stockpiles and finally rehabilitation of contaminated stocks are essential components of the elimination process of an hazardous chemical in use.

Since NEA has controlling authority over emission of hazardous chemical to the environment; the most suitable organization to implement new laws related to PCBs would be the CEA.

Preparation of a complete inventory requires participation of stake holders and MENR may be the most suitable organization to coordinate this activity. Support of the Ministry of Power and Energy is required at the national level. Necessary funds for this purpose have to be raised.

Draft manual for the maintenance of equipment is already available and this could be improved by the stake holders.

Upgrading of present laboratories for testing of PCB is necessary and for accomplishment of this task, avenues for funding this activity have to be identified. Perhaps ITI is the most suitable accredited local laboratory for the purpose of providing necessary guidance.

Phasing out, transport, storage and disposal of equipments would be in accordance with the UNEP guidelines and should be carried out by the users with monitoring and supervision of CEA. But a separate approach may have to be adopted regarding the equipment with private sector. CEA has to play a major role in the preparation of an inventory and in the disposal of contaminated equipment with the private sector. The monitoring of above activities need to be done by MENR and MPE with required assistance from CEA.

The major stake holder institutions require capacity building for control & management of PCBs. A task force or a management team is essential within each organization. The required capacity building has to be supported with necessary guidance and support.

Disposal of existing stocks is a long term process as some of the equipments are still in use. The initial step would be to be to develop guidelines with expert assistance and identification of facilities for this purpose. The existing mechanism for disposal also needs to be reviewed to identify contaminations.

For research and development related to assessment of impacts and for the elimination process support should be availed from the scientific community in the country. Research plans to be prepared with appropriate time frames to accomplish this task.

# 4.3 Unintentionally produced POPs – Dioxins and Furans

Dioxins and Furans are produced under different circumstances and therefore, require a completely different management approach compared to other POPs. The major thrust under the NIP, is through the `Best Available Technologies' (BAT) and `Best Environment Practices' (BEP). The BAT/BEP would be both technically feasible and economically viable practices and not necessarily very high-tech practices. It is possible and also necessary to introduce BAT/BEP to new sources of dioxins and furans. Traditional industries need to be studied with a view to improving particularly their combustion technologies in an economically feasible manner. One advantage in this process is that there is no requirement for using very expensive methods of testing for detection of emissions of dioxins and furans.

The legal authority for solid waste management is vested with the local authorities. The present composition of solid waste is heterogeneous and include both bio-degradable and a variety of non bio-degradable types of waste. This requires a higher level of management than in the past. This management system should cover activities from the point of waste generation to the point of ultimate disposal. All possibilities of economic utilization of waste, such as power generation, recycling and composting are some activities that could be utilized effectively. As a consequence

of the present practice of uncontrolled burning of solid waste it has become a major source of emissions of dioxins and furans. Therefore, burning of waste in urban areas should be prohibited for many reasons. The local government authorities need to be assisted by formulation of effective legislation for this purpose. For rural areas, prohibition of waste burning is not practical due to lack of alternative methods of disposal. Adoption of BAT/BEP practices through awareness programs appears to be a solution for rural areas. Creation of awareness among rural masses is necessary for this purpose. Agriculture sector is carrying out a program against burning of straw in paddy fields; furthermore, action needs to be taken against burning of rice husk in the open areas. A better method of disposal of rice husk may be to look in for more avenues of economic use of rice husk.

The current disposal system of medical waste is not is not satisfactory and should be reviewed and development plans should be made to replace current practices with BAT/BEP in collaboration with medical authorities. Medical waste should not be allowed to be dumped in common dump yards for obvious reasons.

The existing technology of secondary metal recycling plants and also traditional industries without air pollution control systems has to be reviewed with a view to introduction of BAT/BEP. The residues formed and their disposal also may be an area to be reviewed and suitable systems should be worked out.

Local authorities are responsible for any improvements in the crematoria. The existing crematoria should be studied with a view to improve them under BAT/BEP. Improved designs for crematoria with temperature control system need to be introduced. Since more number of crematoria would be established in future, standard guidelines should be provided to the local authorities in the correct direction.

# 5. Recommendations on meeting the social and economic cost of POPs control and elimination;

Availability of government funds is limited for research, development and environment improvement. There can be market based instrument or other revenue generating measures which can be effectively utilized for this purpose. Some recommendations in this regard are furnished below.

- At present a low level of customs duties are applied to pesticides to ensure low market price of this commodity, particularly for agricultural production. Similar situation exists even for fertilizer. According to Sri Lanka Customs; the custom and other duties charged on import of pesticides are a general duty of 4.13% (1.63 + 2.5) except for mosquito coils and a value added tax (VAT) of 15% on the import value. Nearly about 200 pesticide formulations are registered with the Registrar of Pesticide and there are several alternative pesticides in the market to control similar pests. Among them some pesticides are more hazardous than others. However, importers continue to supply relatively more hazardous pesticides as there is a demand for them. If more hazardous pesticides discouraged, they will be replaced by better alternatives already available in the market. Therefore, it is proposed to introduce a 'cess' on more hazardous pesticides at higher rate, particularly when better alternative pesticides are available in the market. Normally funds generated from cess collection are available for designated development purposes. Technical guidance in identification of hazardous pesticides for this purpose could be obtained from the Technical and Advisory Committee under the Pesticides Act. This can be a environment friendly proposal as it would help to replace more hazardous pesticides in use.
- Introduction of a special tax on waste produced by applying the 'polluter pays the cost' principle;

Certain business enterprises and some households produce large amount of waste. Sometimes agricultural produce is brought to the urban areas without prior cleaning and sorting out and also more waste is produced due to improper methods of transport. This activity takes place in urban markets and large amount waste is produced for clearing by local authorities. Therefore, those enterprises and households producing large quantities of solid waste should be identified to impose a waste clearing tax over and above the normal rate payment depending on the volume of waste they produce. Simple guidelines need to be developed for this purpose. If such a tax is introduced it would be an incentive to reduce the volume of waste as well.

Creation of an environment development fund/trust by an Act of law or under NEA;

It is desirable to create an environment fund for under taking identified environment development activities. There may be number sources financing this fund. There are a large number of general public, environment societies and organizations willing to contribute to an environment fund. It is necessary to maintain transparency and regular auditing of such a fund to gain the confidence general public. Also, provision should be made to allocate part of penalties imposed on violation of environment regulations to this fund. Penalties could be imposed on dumping waste in public places, places of aesthetic value, open burning of waste in urban areas. .

Introduction of a special fee for crematoria development;

A special fee could be levied in addition to regular cremation charges for crematoria development as a fixed fee by local authorities.

- The current cess applied on import of scrap metal could be further increased to enhance revenue.
- PCB contaminated equipments have to be decontaminated before disposal. Once
  decontaminated, it could be utilized for recycling purposes. Part of cost may be recovered
  through selling for recycling process. Large number of such equipments would be
  available at the envisaged stage of disposal of decontaminated equipment.

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