



Comments from Islamic Republic of Iran

With reference to the decision 3/9 of the Conference of the parties to the Basel Convention held in Bali, from 23-27 June 2008 on the Strategic Plan and a new Strategic Framework adopted by COP9, the following areas are suggested in implementing the strategic plan:

1. Consideration of policy options in order to control the illegal traffic of hazardous wastes from non-parties as exporter to parties as importer and transit, regarding to the current problems concerning movement of hazardous wastes without notification and receiving official permission from importer countries.
2. Preparation of more detailed HS codes for hazardous wastes subject to the annexes of BC, and removing of repeated items in annexes I and VIII. Identification of wastes as a hazardous waste on basis of annexes is sometime difficult and unclear. In this regard presenting more detailed explanatory guideline for identifying wastes inclusion to annexes VIII and XI from each other is needed.
3. Providing technical guideline for a global integrated experiments, methods and equipments required for analysing waste samples of waste.(for identifying the wastes contained in the Annex XI which will not be wastes covered by Article 1, paragraph 1 (a), of the BC unless they contain Annex I material to an extent causing them to exhibit an Annex III characteristic),
4. Establishment of globally integrated standard limits for determination of the characteristics of hazardous waste. For example the amount of heavy metals in wastes in order to be considered as a hazardous waste.
5. Providing a technical guideline for improving zero wastes industrial systems or reduced wastes systems or designing a method for introducing modern clean or cleaner Technologies.
6. Establishment of a data network to follow the waste stream in stage of production, movement and disposal of hazardous wastes from source of generation to the disposal destination at international and regional level available for parties under Basel Convention.



7. Awareness raising and technical knowledge of developing countries concerning current issues on hazardous wastes and other wastes.
8. Strengthening customs as one of the main factors in implementation of the BC by providing specific training programs.
9. On the purpose of upgrading the implementation of Basel Convention context in developing countries, providing of financial support for above mentioned items should be considered before designing a compliance mechanism.