

Comments from Kazakhstan

Group 2

Day 1, 25.11.2024

Kazakhstan will provide more detailed comments during upcoming days. Here we want to bring attention on next issues.

We agree that **the definitions of "EMISSIONS AND RELEASES"** are not entirely clear, making it very difficult to determine what should be included in the Section 7.

We also believe that issues related to **chemicals of concern** should be discussed after some deliberations have taken place in Group 1.

Regarding the regulation of **micro- and nanoparticles**, the key challenge lies in the limited scientific research and technologies aimed at studying their impact, monitoring, and safe management. We believe that the Treaty should **only reflect intentions to conduct scientific research on micro- and nanoparticles**.

Compliance with multiple international agreements, such as the Basel Convention, and the future legally binding instrument, may challenge national coordination, especially in resource-limited developing countries. To avoid duplication and ease integration into existing frameworks, Kazakhstan supports clear alignment with existing agreements and coordinated efforts to reduce administrative and financial burdens. These should be taken into account in the section 8 where waste export is concerned – as we know, the export and import of plastics are already regulated under the Basel Convention.

We believe that the **EPR (Extended Producer Responsibility)** should be reviewed in more detail in the Section 8, taking into account the need for measures to be implemented at the national level.