Bosnia and Herzegovina
Ministry of Foreign Trade and Economic Relations

ROUNDTABLE ON LEGAL AND REGULATORY FRAMEWORKS FOR STOCKHOLM CONVENTION IMPLEMENTATION

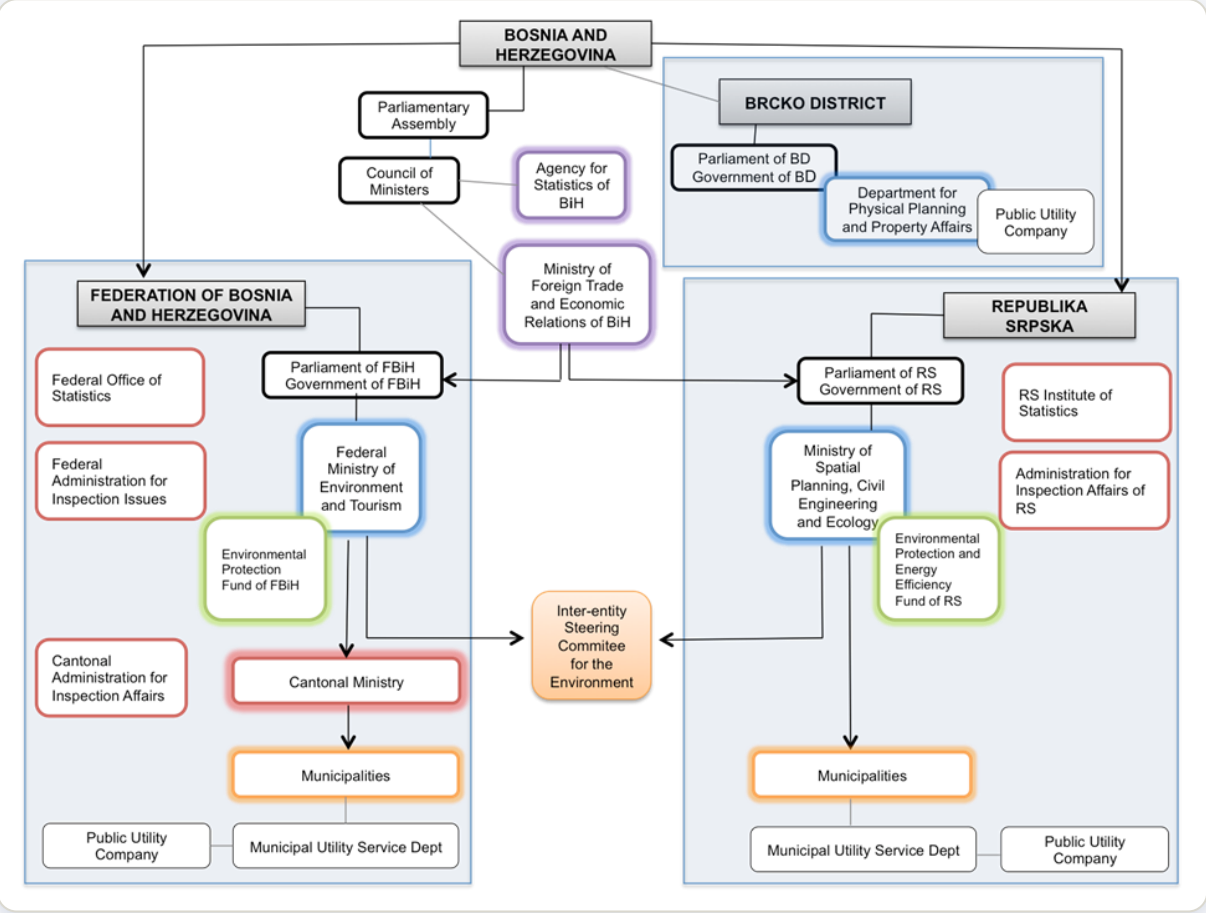
Stockholm Convention in Bosnia and Herzegovina: complex system, joint results

Azra Rogović-Grubić

National Focal Point for the Stockholm Convention, MOFTER BiH

GEF 10785 Global NIP Update
14 October 2026 · online

A complex system, one joint effort



Sources: NIP BiH 2016; GAP analysis of legal and institutional readiness, UNDP 2020



3.5 million

inhabitants · 51,200 km²

- Federation of BiH: 10 cantons, 79 municipalities
- Republika Srpska: 62 municipalities
- Brčko District

All levels work together

MOFTER is the focal point for Basel, Rotterdam and Stockholm. A NIP steering committee of 9 institutions from all levels; the same partners in the UNDP POPs project and the NIP update.

2010–2026

From ratification to the updated NIP



Ratification

Stockholm Convention ratified on 30 March 2010

First NIP

6 working groups, 52 members from institutions, NGOs, academia and institutes; 11 priorities, 41 objectives, ~180 actions

UNDP POPs project

POPs inventory; 17 regulations; guide and training for customs officers; 10+ contaminated sites analysed, remediation plans for 2; ~35 t of pesticide packaging disposed of

NIP update

GEF 10785 with UNEP and RECETOX; new chemicals listed 2016–2023 analysed; priorities agreed with stakeholders

Updated NIP

New POPs listed up to 2023; 12 priorities; first map of contaminated sites

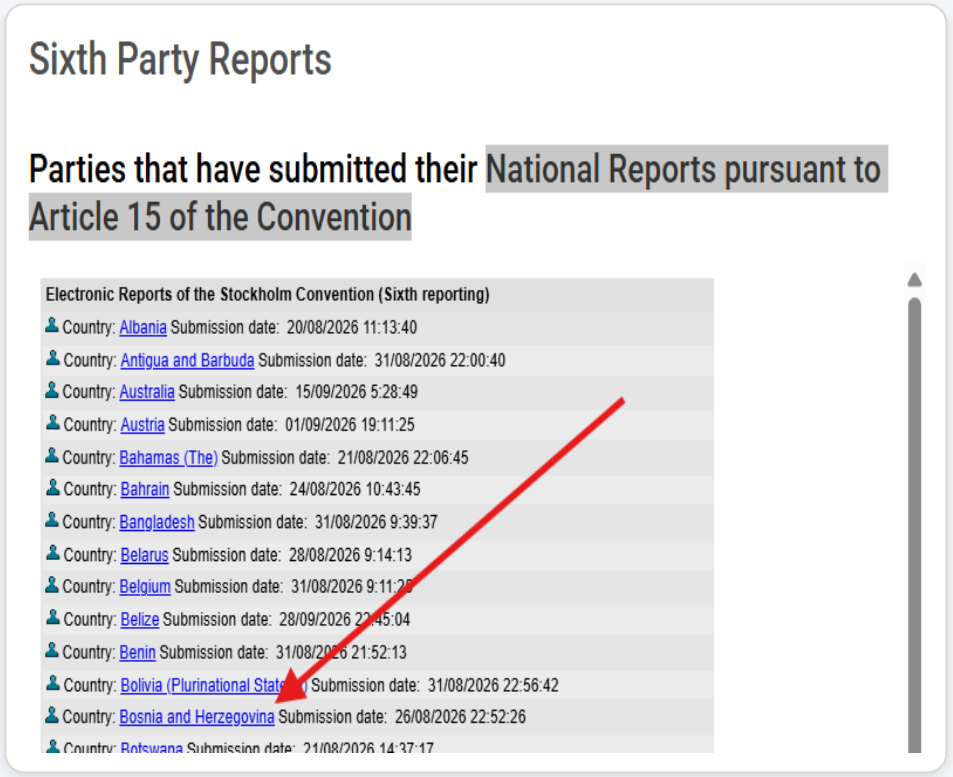
National Report

Sixth National Report pursuant to Article 15, submitted on time on 26 August 2026

PCB waste exported

111 t in 2015 and ~13 t in 2026, for environmentally sound disposal

Sixth National Report submitted on time



Secretariat website: BiH submitted on 26 August 2026



Part B: Section IX. Research, development and monitoring (Article 11)

Part B: Section X. Technical assistance (Article 12)

Part B: Section XI. Financial resources and mechanisms (Article 13)

Part C: Section I. Measures to reduce or eliminate PCB releases from stockpiles and wastes (Article 6)

Part C: Section II. Measures and management of PCB (Article 6)

Source group	Inventory year 2023	NR	Annual Releases (g TEQ/year) Air	Water	Land	Product	Residue
1 - Waste Incineration			0.1	0.0	0.0	0.0	0.4
2 - Ferrous and Non-Ferrous Metal Production			15.1	0.0	0.0	0.0	9.2
3 - Heat and Power Generation			55.6	0.0	0.0	0.0	3.7
4 - Production of mineral products			0.6	0.0	0.0	0.0	0.0
5 - Transportation			0.1	0.0	0.0	0.0	0.0
6 - Open Burning Processes			32.6	0.0	1.1	0.0	0.0
7 - Production of Chemicals and Consumer Goods			0.0	0.1	0.0	0.7	0.1
8 - Disposal			0.0	0.5	0.0	0.0	0.4
9 - Miscellaneous			0.0	0.0	0.0	0.0	0.0
10 - Identification of Potential Hot-Spots					0.0	11.9	0.0

Electronic reporting system: releases of unintentional POPs (g TEQ/year), inventory year 2023

Source: Stockholm Convention website and electronic reporting system, sixth reporting cycle

RESULTS OF THE LAST FIVE YEARS

From plans to results on the ground

14 **contaminated sites investigated**

Risk assessments; remediation projects for INCEL (Banja Luka) and HAK (Tuzla); first map of contaminated sites in 2026

~124 t **PCB waste exported**

111 t in 2015 and ~13 t in June 2026, for environmentally sound disposal with all Basel consents

35.5 t **pesticide containers**

Collected and disposed of; container management programme for 2025–2029

17 **laws and by-laws**

Through the UNDP POPs project, with technical assistance; GAP analysis and roadmap (2020)

1 **guide for customs officers**

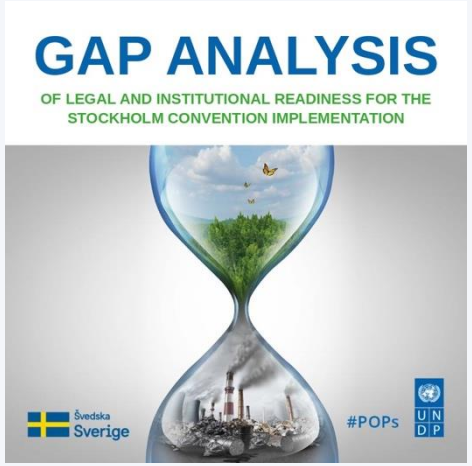
Developed under the UNDP POPs project, with training, so officers can recognise banned chemicals and products

7 **accredited laboratories**

For certain POPs, up from 3; equipment worth USD 250,000 for two public labs. 19 awareness events, ~500 participants

Sources: Updated NIP BiH 2026; UNDP POPs project 2019–2025; UNEP/MAP MedProgramme PCB disposal 2026

From the GAP analysis to an umbrella Decision



GAP analysis (UNDP, 2020)

First step of the legal technical assistance; publicly available

- Reviewed laws and by-laws of BiH, FBiH, RS and Brčko District
- Mapped the competences of 40+ institutions at all levels
- Clear proposals on what to change, the basis for 17 regulations drafted with UNDP support

BiH LEVEL

Draft, not yet adopted

Decision on the Implementation of the Stockholm Convention

Umbrella act that ensures coordination and covers what is specific to POPs: reporting under Article 15 and cooperation with the Secretariat, the role of customs, a register of POPs chemicals, import/export licences with entity consent.

Federation of BiH

Law on Chemicals (2020)

Republika Srpska

Law on Chemicals (2018)

Brčko District

Law on Chemicals in preparation

Entity level: chemicals in general

Adopting the Decision, as already done for Basel, Rotterdam, Montreal, UNFCCC and CITES, will significantly support full implementation of the Convention.

Source: GAP Analysis of Legal and Institutional Readiness for the Stockholm Convention Implementation, UNDP BiH, 2020

Not only bans: legislation for waste and contaminated sites

1

Chemicals

RS: Law on Chemicals (2018) with rulebooks on restrictions and import/export. FBiH: Law on Chemicals (2020) and a ban decision. Ministries of health issue import permits and control.

2

Pesticides

Easiest to ban: only active substances on the state-level list, regularly updated, may be imported and used. POP pesticides are not on it.

3

PCB equipment and waste

Dedicated rulebooks in both entities: RS (2019) and FBiH (2021). They made the inventory and the 2026 export for disposal possible.

4

Contaminated sites

RS: rules for identification, soil limit and remediation values, and remediation projects. FBiH: rules in development. 2026: first map of contaminated sites.

Bans, waste management and remediation together protect health and the environment.

Incorporating newly listed POPs

Obstacles

- Fragmented competences: each listing is transposed several times
- Uneven implementing rules: RS most advanced; FBiH chemicals by-laws pending; Brčko District has no chemicals law
- Lists lag behind COP decisions (e.g. decaBDE)
- Water, soil and food limits do not yet include PFOS, PFOA, dicofol, PCP

How we address them

- Updated NIP as a legal roadmap: action, institution and timeline for each gap
- Waste categories aligned with the EU POPs Regulation; RS POPs waste rulebook extended to PCP and dicofol
- New POPs added to water, soil and drinking-water limits (EU directives)
- Adopt the BiH-level umbrella Decision on Stockholm Convention implementation (draft ready)
- EU alignment gives all levels the same reference text

What works for us: a chemicals law with updatable lists

Dedicated POPs law

One clear reference, but a law to amend after every COP, and overlap with chemicals and waste laws.

Our experience

General chemicals law + by-laws

Republika Srpska: bans, restrictions and an export-ban list of Annex A/B POPs sit in rulebooks that can follow each COP. Aligned with REACH, CLP and the EU POPs Regulation.

Sectoral provisions

Essential for waste, PCBs, water, soil and food, but on their own they leave products and the market uncovered.

Where competences are split: entity chemicals laws with lists in by-laws, sectoral rules, and a BiH-level umbrella Decision that ensures coordination.

Customs is the front line for POPs in articles

In place today, and the challenge

- Customs officers trained with a dedicated guide (UNDP POPs project) to recognise banned chemicals and products
- Ministries of health issue import permits for chemicals and carry out controls
- Challenge: tariff codes are too broad; pure HBCD got its own code only in 2025
- Challenge: PBDEs arrive mostly inside vehicles and electrical equipment

What the NIP 2026 plans

1. Official list of prohibited POPs with CAS numbers and HS codes
2. Integration into the customs IT system (ASYCUDA) and continued training of customs officers
3. Rapid detection instruments at priority border crossings
4. Criteria against imports of second-hand products with POPs
5. A system to identify POPs in products

KEY MESSAGES

Three lessons from Bosnia and Herzegovina

1

A complex set-up works when all levels act together, anchored by an umbrella Decision.

2

Legislation must cover the whole life cycle: bans, waste, PCBs and contaminated sites.

3

Keep lists updatable in by-laws; train customs officers and give them the tools.

Thank you