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**Promotion and protection of all human rights, civil,
political, economic, social and cultural rights,
including the right to development**

**Written statement* submitted by Association pour la défense
des droits de l'homme et des revendications
démocratiques/culturelles du peuple Azerbaidjanais-Iran - «
ARC », a non-governmental organization in special
consultative status**

The Secretary-General has received the following written statement which is circulated in accordance with Economic and Social Council resolution 1996/31.

[19 August 2024]

* Issued as received, in the language of submission only.

Permanent Environmental Crises Inflicted on Azerbaijani Provinces by the Islamic Republic of Iran

This statement (the Statement) is prepared by the ArcDH Association to address risks of toxic substances in Iran with a focus on their impacts on the nation of Azerbaijan in Azerbaijani provinces. A catalogue of pollution risks is long and at the crisis level. Today, the pedosphere (soils), hydrosphere, atmosphere and biosphere are either suffering from a permanent damage or impending risks are impacting the people, fauna, flora, natural resources and assets. In this statement, we touch on hotspots of pollution risks, point out towards the drivers (more likely, their absence) to seek and implement mitigatory measures, the Iranian policymaking and their impacts on Azerbaijanis.

The Catalogue of Pollutants

Cataloguing toxic substances in Iran and the Azerbaijani provinces is a complex topic and beyond the Statement but this is a serious problem at every front of toxic substances: (Air Quality, Energy and Health, Arsenic, Asbestos, Benzene, Cadmium, Dioxins/dioxin-like substances, Inadequate or excess fluoride, Lead, Mercury or Highly Hazardous Pesticides). To understand the scale of the problem:

- The permissible WHO Annual average PM_{2.5} concentration is: 5 µg/m³; 24-hour average and there are 38 cities in Iran exceeding the limit with the worst one ranked as the first. Tabriz is purportedly ranked as the 34th Average Annual PM_{2.5} levels (27.2 µg/m³) in 2022 [Air pollution in Iran: The current status and potential solutions | Environmental Monitoring and Assessment (springer.com)].
- Iran is purportedly the 21st most polluted country in the world based on PM_{2.5} [https://en.wikipedia.org/wiki/List_of_countries_by_air_pollution].
- Consider the following report: “About 40,000 people nationwide die each year due to health problems linked to air pollution, from respiratory infections and lung cancer to heart attacks, according to the Air Pollution Research Center at the Tehran University of Medical Sciences.”

[<https://www.reuters.com/article/business/autos-transportation/feature-toxic-smog-iran-criticised-for-winter-air-pollution-catastrophe-idUSL8N3523QE/#:~:text=%22Iran%20is%20in%20the%20middle,is%20considered%20the%20most%20toxic>].

The problem is that the statistical figures concerning the Islamic Republic of Iran are subjected to expediency arbitrarily at the expense of clearly definable principles and therefore manipulated as and when necessary. They are normally not reliable, unless the values are scrutinized by international data hubs or obtained by individual university researchers.

The plain truth is that the country is infested by toxic pollutions. However, there are quite few other countries with a similar level of toxic infestations but unlikely to undermine the rule of law and policymaking concerning toxic substances, as Iran. Let us expand on this.

Policy Basis

Dr Shirin Hakim, Head of the Environment, Climate and Public Health at the Center for Middle East [230711_Hakim_Iran_Environment.pdf (csis-website-prod.s3.amazonaws.com)], said in an Interview that Iran “currently faces a host of environmental challenges that threaten its sustainable development potential. While Iran’s environmental crisis has been exacerbated by the impacts of climate change, the main culprit of the current environmental decline is environmental changes induced by human activity.” She identifies three cases: water crisis, pollution, urbanization.”

Also, one reads in a published paper: Iran “has legislation, regulations and decrees to protect the environment as well as environmental institutions and non-governmental organizations. Iran has also declared its desire to partake in international cooperation to mitigate its environmental problems. However, Iran’s short and medium-term political and economic policies are given more priority than those related to sustainable development and countering environmental threats [Journal for Iranian Studies (rasanah-iiis.org)].

In discussing environmental law in Iran, the Varda Law Firm writes that “lack of legislation about environment is the main cause of these irrecoverable problems” [<https://vandalawfirm.com/en/what-is-environmental-and-environmental-law-in-iran/>].

Consider the Department of Environment (DoE) [<https://www.doe.ir>], which fakes the US Environmental Protection Agency, as EPA has a function to fulfil but DoE is subservient to the president (who is subservient to the so-called Supreme Leader) and follows its orders just like a soldier with little independence or ethics, i.e. DoE is not on record to say No to its masters. DoE was responsible for the desiccation of Lake Urmia; turned the Sustainable Development Goals in the country into a quagmire; and let the Supreme Leader to sabotage it. The United Nations is desperate to keep Iran on board and prepared a bespoke framework for Iran (the UN Sustainable Development Cooperation Framework, 2023): https://www.unodc.org/documents/islamicrepublicofiran//2023/UNSDCF_for_Iran_2023-2027_0.pdf. It is a watered-down version of SDGs, but its delivery is now on rough grounds.

It is true that the ideals of the environment and health have been somewhat expediently captured in the Iranian Constitution, legislatures and talked about by academics and NGOs, but:

- What good is the Constitution, if it will not be enacted by the parliament?
- What good are the parliamentary acts, if they will not be used by executive authorities?
- When good are executed acts, if they are not enforced by law authorities?
- What good are enforced laws, if they are selected by discretions here and there?
- What good are selective laws, if decree will end everything and then back to Square 1!

Nonetheless, we shall be ‘expedient’ and outline what nominally is out there, bearing in mind that as soon as one is engaged with counting this factor or that, similar to Shirin Hakim above, the problem turns into a ‘wicked’ problem, i.e. there is no solution. The reasons are two folds:

- At Fold 1: Iran is a country where the officials are in a maze of collusion, no check-and-balance among the division of power, no independence of lawyer, no independent auditing, no accountability, no transparency, no inclusion, no integrity ...
- At Fold 2: Internally, it is rule of one person over all the rest; and the hegemony of a minority nation over the majority composed of minority nations including Azerbaijanis; there is no concept of vulnerability in Iran, where it is a virtue to leave out the vulnerable (i.e., the minority nations) and offer them plenty of cleverly worded disingenuous praises and empty promises for the deprived and the vulnerable ...

Some of the Evidence

- Lake Urmia died under DoE supervision and two former presidents (Rouhani and Raisi) proclaimed that they restored the lake but DoE remained silent. Instead, one of its former heads wreaked havoc in 2023 in Azerbaijani cities cried wolf that salt-storms are underway. For years, untold diseases have been impacting Azerbaijanis (human health, flora, fauna, agriculture ...) and yet DoE is not minded with monitoring!

- Numerous mega-mines have brought Azerbaijani environment and local residents to the point of crisis with multifaceted impacts including the injection of toxic substances into most of the spheres. One should be prepared to most unexpected deceptions. For instance, the Sungwn mines have their tail-dam at the River Ahar catchment, which is clean, but its waste is disposed to the River Ilqinay, flowing to the River Araz! In this way, they proclaim no pollution.
- The hotspot of carcinogenic metals triggered from arsenic and heavy metals, DoE remains silent to mining pollutions and the State silences Azerbaijani activists.
- Water resources are getting highly polluted from geogenic and anthropogenic activities and DoE simply remains silent.
- The breaching of the waste lagoons of the Kaveh Soda factory in Maragha has created untold slow-death and misery to Maragha and Binab on 25 April 2010. It poured out an estimated 1,000,000-m3 of toxic waste into agricultural land and groundwater. An academic study shows that it would take 30 years to treat it at a huge cost, but DoE happily ignored it.

Impacts

Risks are existential to the nation of Azerbaijan in Iran due to policies of racist Iranian authorities, and they achieve this in a variety of way, one of which is waging a permanent crisis often among Azerbaijanis and many other minority nations. The risks are diverse and total and toxic substances are just one aspect of them. There are some academic research identifying hotspots but they lack data on the impacts, which is the duty of DoE and therefore if they release any data, they should be regarded as the expedient DoE data.

If any environmental risk is geogenic, the processes surrounding them are often accelerated by irresponsible acts of the Iranian authorities or anthropogenic encroachments, where DoE must speak up. In most of the cases, risks are anthropogenic and directly instigated by the policies, decisions, acts and deeds of the Iranian authorities or developers. These are in a background, where the water cycle is being damaged and there is no preparedness by DoE against the preventions and mitigations of such risks, or climate change and biodiversity. Thus, the future is being shaken off at its foundations.

Concluding Remarks

Pseudo-democracy in Iran has given rise to a fake operational governance system, where nothing is safe from faking. It may have a department called the Department of Environment with responsibilities to reactively monitoring the environmental state, but its creation serves the retardation of environmentalism. The impacts of its nonactions on the Persian provinces are mitigated by megaprojects (which are likely to have impacts appearing in the long-term). However, the minority nations remain unprotected, as such the nation of Azerbaijan in Azerbaijani provinces are exposed to permanent environmental crisis.

Association Arc pour la défense des droits de l'homme et des revendications
démocratiques/culturelles du peuple Azerbaïdjanais-Iran - « ArcDH » NGO(s) without consultative
status, also share the views expressed in this statement.