

Al Fatah AlMubeen facility cleaning project

The control body specialized environmental affairs conducted control and auditing on the unit of monitoring contaminated areas and management of chemicals in the environment directorate of Karbala according to requirements of the law of BSA no. 6 of 1990 (amended) and the adopted standards in this field. The unit procedures of facility have been audited according to the Board order, no. 2527 on 20 December 2011. The facility is one of facilities of dissolved military manufacturing body. The audit body has prepared the following report:

Activities Overview (formerly)

Al Fatah Al Mubeen facility was one of facilities of dissolved military manufacturing body that considered as one of great projects specialized in manufacturing the various ammunitions in Iraq. The facility was established in 1988 and produced the unilateral and bilateral gunpowder, and high explosive TNT material, that packed in various ammunition, bombs, and missiles which did painting and the accomplishing operations to this ammunition. The facility is located in the northwest of Holy Karbala city about 3 km from the main highway (Baghdad- Karbala). The site area is about 2400 Dounms (Dounm=2500m² in Iraq) and the site width is about 1500m and the site length is 4000m including the paved internal roads, squares, and huge earthen barriers. The site was bombed by the coalition forces in 2003, that led to a completely destroying and also exposed to looting, which led to spread pollutants and dangerous materials across the site.

And the facility previously consists of the following parts:

- 1- al- Fars, al-Helal and al-Naser buildings ,which are the factories of gunpowder packing, the ammunitions and missiles painting and is regarded as the last stages for process.
- 2- The factory of the gunpowder production from the raw materials and is situated in the beginning of facility.
- 3- The stores, including the production stores, the raw materials and the spare parts stores.

4- The uncompleted expansions: they include several expansions that were never functioned, they are structures and buildings that were not utilized and they are the factories acids and middle material for gunpowder production.

Through auditing the documents related to this facility, we have the following notes:

1- Ministry of environment issued an administrative order no. (78) on 15/3/2006 they include forming a team work to conduct the environmental evaluation of the place within the investment project (the environmental evaluation for military industrialization facilities), the team conducted the environmental evaluation, taking sample, collecting information, taking photos (attached copies of it) and results of the samples inspection in the environmental analyses centre of Baghdad environment office, the table below shows the analysis of the heavy elements in the site:-

number	The inspection	The sample number	The inspection result	Standard determinant
1	Nickel	1	155	30-75
2	Nickel	2	200	30-75
3	Nickel	4	175	30-75
4	Nickel	5	205	30-75
5	Nickel	6	215	30-75
6	Nickel	B2	99	30-75
7	Nickel	B4	80	30-75
8	Nickel	B23	88,5	30-75
9	Cadmium	1	3,5	1-3
10	Kherson	B3	425	150-300
11	Mercury	5	8,7	1-1,5

From the table above it is clear that the actual values of the heavy elements were more than the specific standard accepted under the World Health Organization (WHO) instruction, rates up to more than double in some cases that cause food poisoning due to high concentrations of these elements, especially when they enter into the food chain, as well as those elements increase the probability of cancer diseases.

2- Karbala environment directorates consider sites sever pollution according to the administrative order no. (284) on 7/2/2008 addressed to the Karbala governorate office.

3- Karbala environment directorate under the administrative order no. (591) on 14/12/2008 , prepares a tender about treatment ,decontamination , conducting onsite treatments ,different civil works and build storage for hazard wastes, and forwarded the tender to the environmental minister technical deputy office under the letter of the investments projects committee in the ministry no. (452) on 1/12/2008 .A committee of experts was formed of experts in the ministry in order to study and evaluate the tender. The committee submitted several observations forwarded to the directorate under the maintenance and construction department letter no.(388) on 12/4/2009 ,for the purpose of reformulating tender according to the expert committee observations.

4- A new tender didn't prepare until the end of the 2009, as mentioned in the letter of the following up investment projects committee no.(799) on 21/7/2009. After changing the administration of environmental directorate of Karbala, the new administration is requested to speed up the new tender preparation for the purpose of implementation under the letter of maintenance and constructions department no. (1171) on 12/10/2009.

5- The project was withdrawn from Karbala environmental directorate; work team was formed in the ministry of environmental technical department in order to accomplish the evaluation and continues the examination. The evaluation result don't announce till now.

6- Karbala directorate allows using of earth barriers soil under the letter no (2732) on 20/13/2009 to Karbala governorate – the governor office in respond to Karbala governorate –governor office by its letter no.(48) on 15/12/2009.

7- according to the approval gained from Kerbela environment directorate removal of Earthen barriers was commenced from Al-Fatah Al-Mobeen Site, being classified as a highly polluted one as mentioned above and the earth as exploited for padding Important sources of water in the province, specially padding of project of Alhusainiya

river, Alwand river, and (BC1) . These projects represent the main sources of water which projects and complexes of filtering drinking water depend on. Also, the main resource of irrigation and agricultural land watering, and that was made according to contracts signed between The beneficiaries (ministry of irrigation offices in the province) and Kerbela province council For amounts of cash, For example, the two issued letters from Kerbela province council / Properties no. (5212) (9727) on 28th of April and 11 of October 2010 , to the director maintaining irrigation and drainage projects of Kerbela province , under which the contract of exploitation the quarry earthen (Al-Fatah Al-Mobeen Site) was awarded to the said directorate for the purpose of dumping for the purpose of padding the channel which connect (BC1) between two **Alwand** and **Alkamaliya** streams with amounts of (300.000) m³ and (100.000) m³ with a sum of (7575500) IQD (seventy five million and seven hundred twenty five thousand IQD) and (25755000) IQD (twenty five million and seven hundred fifty five thousand IQD).

8- the technical office in the ministry of environment / evaluation of the polluted sites and chemicals managements department issued a letter to the office of protection and improvement of the environment/ Alfurat Alawsat / technical department No. (134) on 10 January 2010 which provides for informing Karbala environment directorate that the site as a whole is still within the responsibility of project management of the environmental evaluation of the military industrialization facilities, and the matter of quantities table is still under discussion, and that required from Karbala environment directorate is required not to give its acceptance for any party to dispose with Al-Fatah site land till an agreement is reached, the party which gives any acceptance will be bear the responsibility of changes that take place in the topography of the site .

9- The technical agents office of the Ministry of Environment issued letter no. (1828) on 24/6/2010 which stipulated that (the lifting of earth from the barriers should be stopped until the completion of the environmental assessment work , otherwise the Ministry of Environment will not be responsible for any possible contamination that happens due to the transfer and use of the sand of the barriers in the site) .

10- There is deviation in the test results of the drawn samples of soil used in padding and making the sides of the channel (BC1), as reported in the letter no. (84) In 22/12/2010 of Ministry of Environment /technical department /the project management of the environmental assessment of the facilities of military industrialization, the following table depicts these results:

No	Coordinate of drawn sample site	Type of test	Test result	determinants
1	N 3271452 E 04421487	Nickel	99 ppm	30-75 ppm
2	N 3271756 E 04421126	Nickel	82 ppm	30-75 ppm
3	N 3271696 E 04420927	Nickel	127.5 ppm	30-75 ppm
4	N 3271120 E 04419013	Nickel	100 ppm	30-75 ppm

This indicates the contamination of the channel due to the use of the contaminated soils from the site of **Al-Fatah Al-Mobeen**.

11- Ministry of environment /technical department /project management of the environmental assessment of the facilities of military industrialization directed under the letter no. (88) In 2/1/2011 the environmental directorate of Karbala should be cooperate with the project management of Al-Fatah Al-Mobeen site, and not to give any approval to transfer the soils only after consulting the project management.

12- The teamwork of our auditing body carried out field visit to the site of **Al-Fatah Al-Mobeen**, and the following was noted:

A –the continuity of lifting the earthen from different places inside the site not only from the earthen barriers , we noted machines lifting large amounts of earthen from the ground of the site to exploit them the project of YA HUSSEIN ROAD (for visitors) .

B – A large amounts of soil have been lifted from Alfatah location, for padding the irrigation projects, in spite of the ministry of environment's confirmation was not give any approval to do that. The lifted amount is (410000 m³) according to the letter of environment protecting and

improving office in Alforat Alawsat Area no. 5081 on 3 November 2010 to the ministry of environment /technical deputy office. The canals padding accomplished 15% of the project, but the lifting is still ongoing until the date of this report.

C – The body has noticed there were no warning signs or risks indicators, indicating the dangerous of the site we have seen free animals inside the facility, in addition to the existence of agricultural lands and agglomeration live next to the facility and no fence or barriers preventing the people from entering the site.

13 – Summary

A – The ministry of environment has delayed in completing the cleaning up Alfatah Almubeen Facility, since 2006 till now, in spite of the evaluation as one of the highly polluted sites has caused all further work that have been referred to in this report.

B – Environment directorate of Karbala governorate had issued an approval to lift and use the facility soil barrier in padding the irrigation canals without reference to the ministry of environment/technical office. No procedures have been conducted by the ministry toward the environment directorate of Karbala when the directorate had given the approval to lift the soil barriers from Alfatah facility.

C – Karbala governorate approved to lift the soil lifting from the facility site (barrier and ground dirt) for other bodies other than the ministry of water resources as holy shrine visitors' road project.

14- Recommendations

The body recommends implementing the following procedures:

- a- Issuing an order to terminate earth removing (the remaining & ground barriers)as soon as possible, the Ministry of Environment undertakes re-evaluation and cleaning the site , as well as examination evaluation of used earthen in padding the Sadder al-Hussein, Al waned & BC1 channels . The necessary actions should be taken, in case of pollution by heavy elements in these channels, in cooperation with relevant departments.

- b- Termination of contracts execution that awarded by Karbala governorate board to remove earth, to Ministry of Water Resources, to (Ya Hussein) road construction project for visitors.
- c- Investigating of reasons for approvals granting from Karbala environment department of earth barriers removing, although, the Ministry classified the facility as a highly polluted area.