

Ecological Society Green Salvation

Republic of Kazakhstan, Almaty

Established in 1990.

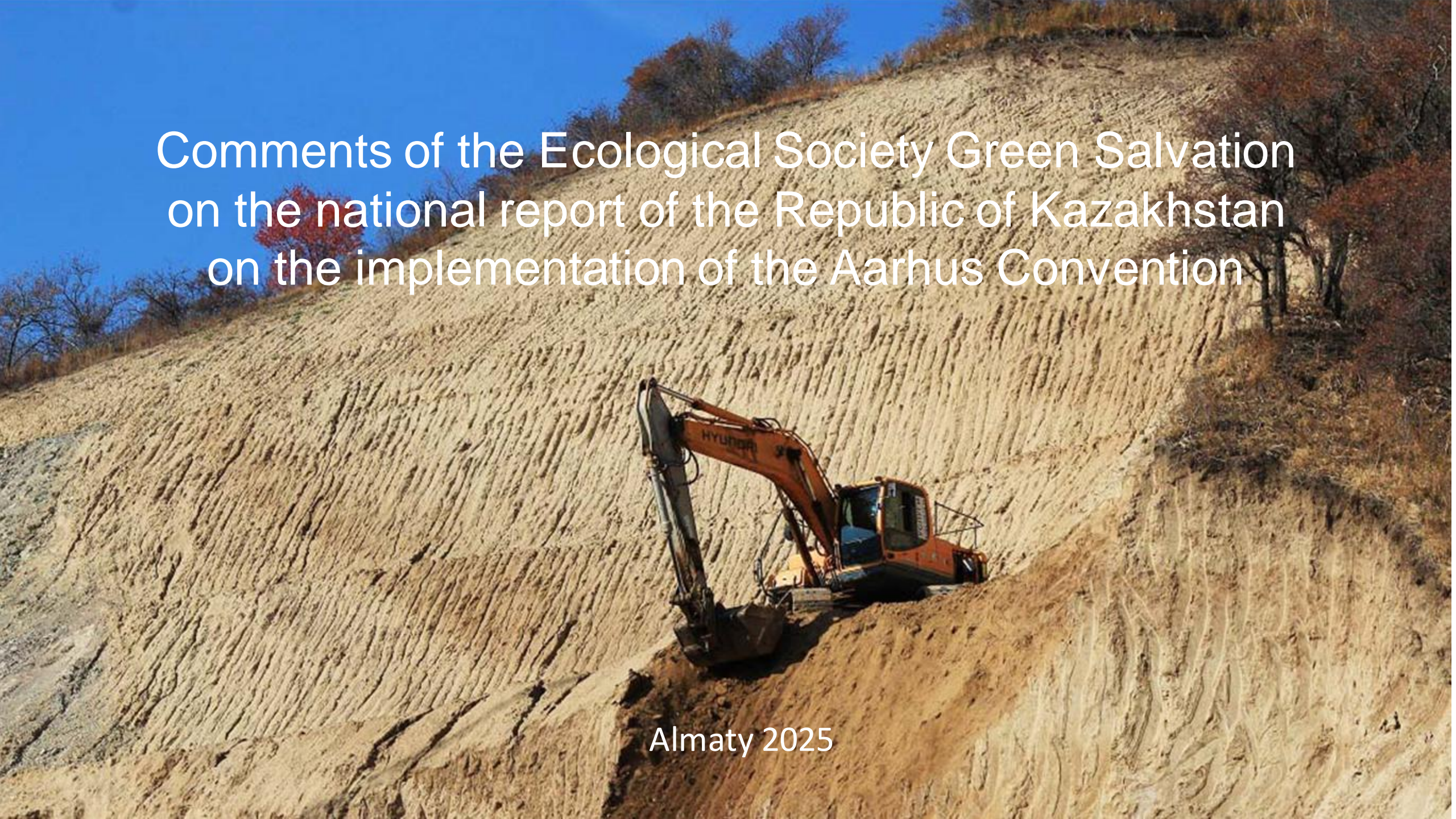


Main activities:

- Protecting human rights to an environment adequate to his or her health and well-being through pre-trial and judicial methods;
- Participation in the discussion of developing regulatory legal acts concerning the environment;
- Promoting the conservation of specially protected natural areas the Almaty region and the city of Almaty, primarily national parks. The organization has been monitoring the environmental situation on these lands for over eighteen years;
- Collection and dissemination of reliable environmental information through the website, social media, and printed publications in Russian and English;
- Promoting environmental education and awareness.

Comments of the Ecological Society Green Salvation on the national report of the Republic of Kazakhstan on the implementation of the Aarhus Convention

Almaty 2025



I. The provisions of Articles 4 and 5 of the Convention are not fully implemented by the Republic of Kazakhstan.

- Public access to environmental information remains challenging. The Report does not provide statistics on the provision of environmental information to the public.**
- Responses from government agencies to the Ecological Society's inquiries from 2021 to 2024 contained approximately 50% incomplete and inaccurate information. Even in accordance with court orders, government agencies do not always provide complete and reliable information.**
- Inaccurate information is also provided in the Report of the Republic of Kazakhstan, which states that “the right of citizens to a favorable environment is enshrined in paragraph 1 of Article 31 of the Constitution of the Republic of Kazakhstan, which states, ‘the state aims to protect an environment favorable for human life and health.’”**
- The State's intention to protect the environment does not constitute the right of "every person of present and future generations to live in an environment adequate to his or her health and well-being" (Aarhus Convention, Article 1).**
- On October 29, 2025, the Ecological Society filed a lawsuit in connection with the Ministry of Ecology and Natural Resources providing false information to the Aarhus Convention bodies.**

Construction of commercial and other facilities in violation of specially protected natural areas.
Medeu Regional Park. Small Almaty Gorge, June 2020.



II. The provisions of Article 6 of the Convention are not fully implemented by the Republic of Kazakhstan.

- In Almaty, authorities ineffectively inform the public about projects and fail to provide them with the opportunity to fully participate in the decision-making process.
- Citizens typically learn about projects at the implementation stage, when changes are impossible to make.
- Public hearings are not required for all projects. Legislation still does not specify a method for taking public opinion into account.
- The exclusion of the mandatory environmental impact assessment procedure "for all types of economic and other activities" from the 2021 Environmental Code has significantly limited public participation in the decision-making process.
- This is particularly evident in the example of the “development” of national park territories, including those covered by the norms of international conventions ratified by Kazakhstan.
- Some foreign companies operating in Kazakhstan also do not provide the public with the opportunity to fully participate in the decision-making process.

Intentional destruction of the natural environment. The site of the formation of "anthropogenic" rain mudflows in 2013 and 2024. Shymbulak ski resort. Ile-Alatau National Park.



III. The provisions of Article 9 of the Convention are not fully implemented by the Republic of Kazakhstan.

- **Constant changes in legislation create new and additional barriers to access to justice.**
- **As a result of the introduction of the Administrative Procedure Code on July 1, 2021, public access to justice was hindered: an appeal to the court is possible only after the administrative procedure has been completed, the statute of limitations was reduced from three to one month, and the court review period was extended from one to three months. One of the Ecological Society's lawsuits took 18 months to be heard in court.**
- **Judges and representatives of executive authorities, during trials and when executing court decisions, allow arbitrary interpretation of laws and decisions of higher courts.**
- **Executive authorities continue to influence court decisions and, in particular, the execution of court decisions.**
- **The enforcement of court decisions takes years. The Supreme Court of Kazakhstan's ruling of May 31, 2023, which obliged the Almaty city authorities to establish a protected zone for the Ile-Alatau National Park, has not yet been implemented.**
- **There is no free access to statistics in the country on defendants' compliance with court decisions.**

In 2013, the Supreme Court, following a lawsuit filed by Almaty residents, ruled that the Department of Sanitary and Epidemiological Surveillance had failed to ensure that sanitary protection zones of industrial enterprises were marked with special signs. This ruling has remained unimplemented for 12 years!



IV. Reasons for non-compliance with the Aarhus Convention by the Republic of Kazakhstan

The Ecological Society believes that the widespread concealment of environmental information, the exclusion of the public from participation in the decision-making process, and the ongoing changes to environmental legislation aimed at weakening it, as well as the failure to comply with international conventions and national legislation, are explained by:

- the lack of a legislatively established environmental policy;**
- the focus of economic policy on the increased exploitation of natural resources;**
- the dominance of the ideology of market fundamentalism among the establishment and businessmen;**
- low level of rule of law in the country;**
- high levels of corruption.**

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