

**NOISE POLLUTION GOVERNANCE IN THE
KURDISTAN REGION OF IRAQ: LEGAL GAPS,
ENFORCEMENT CHALLENGES**

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Note on Scope: This policy paper focuses on the Kurdistan Region of Iraq (KRI) as the primary case study. Iraqi federal law, in particular Federal Noise Control Law No. 41 of 2015, is used throughout as the comparison benchmark to illustrate what is already in place at the federal level and where the KRG framework could apply improvement. Unless explicitly stated otherwise, all analysis and recommendations are directed at KRG's noise pollution policies.

Executive Summary

Noise pollution is a known environmental health issue in the Kurdistan Region of Iraq, but the governance framework is fragmented due to the lack of legal guidance and enforcement mechanisms. Repeated local studies in Sulaimani, Duhok, and Zakho have documented high levels of traffic and generator-related noise. The most specific legally enforceable limits on noise pollution, within the sources reviewed, are in the Iraqi Federal Noise Control Law No. 41 of 2015. The Kurdistan Region's environmental law itself authorizes regulators to specify permissible noise levels, but a publicly accessible KRG regulation with numerical noise limits was absent, or non-existent, at the time of this review. The policy problem is therefore not lack of law but the combination of incomplete regulatory clarity, limited publicly visible monitoring and enforcement data, and weak integration of noise control into transportation, electricity, municipal planning, occupational health, and community compliance systems.

Key Findings

1. Available local studies suggest that urban noise in parts of Iraqi Kurdistan is consistently high. In Zakho, the highest roadside noise level reached 96.1 dB, while in Duhok a study of electricity generators reported a mean level of 74.86 dB(A) at 50 m from generator sites; related Duhok findings also indicate elevated commercial-area noise.¹
2. On the regulatory side, Iraqi Federal Law No. 41 of 2015 appears to provide a more detailed operational framework on noise limits and enforcement duties, while KRG Laws No.8 of 2008 and No.3 of 2010 establish the regional environmental basis and institutional structure.²
3. Both federal Iraq and the KRG have meaningful enforcement and financing tools on paper. Federal law provides inspectors, environmental police, an environmental fund, administrative sanctions, and criminal penalties; KRG law provides environmental observation teams, police support, warnings, temporary closure, fines, imprisonment, and a region-level environmental fund. What is missing publicly is a clear stream of noise-specific annual inspection, complaint, and penalty data.³
4. KRG electricity reform has become a de facto noise policy. Official KRG statements link the phaseout of private generators and the requirement for generator filtration to noise reduction, and the Kurdistan Region Statistics Office (KRSO) survey shows the size of the generator economy that reform must manage.

Problem Profile: The KRG Case Study Compared Against Federal Iraq Benchmark

The KRG noise level standard compared to the Iraqi Federal Government law standard goes beyond the limited range that is allowed, especially in urban areas. Federal Law No. 41 sets outdoor national determination at⁴:

1. 50/40 dB for hospitals and rest areas.
2. 60/50 dB for residential areas inside cities.

3. 55/45 dB for schools and universities.
4. 65/60 dB for service and commercial areas during the day/night, respectively.

Iraq's legal limits for noise measurement differ from WHO's standards of noise exposure during day and night, yet they both have the same policy-approach application.⁵ On the other hand, in some areas of Iraqi Kurdistan, noise levels exceed the standard of Iraq's legal limits and the WHO's health-protective recommendation at the same time.

First, based on resources, the three main sources are busy roads and traffic, neighborhood diesel generators, and mixed use of commercial areas near public places. While Iraqi law explicitly recognizes the issues, the solutions prohibit distributing broadcasting media, using loudspeakers in public areas, and engaging in noisy activities at night. The Iraqi law tasks municipalities with reducing the noises through barriers, afforestation to absorb the sound, and parking management.⁶

Second, the implication is that noise pollution in Kurdistan, Iraq, is not solely a traffic problem, as other factors contribute significantly. In 2021, the Kurdistan Region Statistical Office (KRSO) had documented 3,108 private generators with 8,000 people working in that sector; they have also identified the environmental damage from the noise generators to the workers and the surrounding area as well.⁷ The official KRG statement in 2025 announced that private generators are considered the primary source of noise pollution in neighborhoods and linked their reduction to the Runaki Project to reduce and remove their operation.⁸ This underscores the need for integrating labor transitions, municipal enforcement, and related measures; they should all be planned together as one package rather than separate policy streams.

Governance and Legal Framework

Iraq's federal law gives clear numerical noise standards, while the KRG framework is broader and focused on building institutions and reinforcing rules but lacks publicly available numerical thresholds.⁹ The Iraqi Federal Ministry of Environment's air quality page provides details about the application of the Noise Control law and preparation of studies and annual reports that include noise pollution measurement methods. On the KRG side, the Board of Environment Protection and Improvement offers testing services for pollution in the air, water, soil, and noise while monitoring sustainability across trade, housing, municipal services, farming, healthcare, and more.

The institutional relationships documented in the laws and official agency pages can be summarized through the Comparative Tables of Current Laws and Regulations.

Law / Regulation	Noise Scope	Agencies	Enforcement	Penalties
Law No.27 of 2009	General environmental protection law; exact noise provisions should be verified in the full text.	Ministry of Environment and provincial councils.	Environmental oversight and implementation through the law's institutional framework.	Exact noise specific penalties not confirmed from the available sources.
Law No.41 of 2015	Iraq's noise control law; sets noise-control framework and limits.	Relevant ministries, employers, municipalities.	Planning and source control measures.	Exact penalty range should be checked in the law text.
Instructions No.2 of 1993	Instructions on permissible noise from devices and equipment	Ministry of Environment / relevant authorities	Not clearly verified from accessible sources.	Not clearly verified from accessible sources.

Table 1; Iraqi Federal Law

Law / Regulation	Noise scope	Agencies	Enforcement	Penalties
Law No.8 of 2008	Core KRG environmental law; likely covers noise within broader environmental protection, but the exact noise provisions should be checked in the text.	KRG environmental authorities.	Environmental controls and administrative measures, depending on the article text.	Exact noise-specific penalties should be verified directly from the law text.
Law No.3 of 2010	Establishes the Board	Board and related authorities	Institutional coordination and implementation support	Not verified in the source shown.
January 2025 PM directive	Likely relevant to generator/noise administration, but the exact content should be verified in the directive itself.	PM's Office, office, Board, and municipalities.	Operational directives.	Not verified in the source shown.

Table 2; Kurdistan Regional Law

Policy Recommendations

The following recommendations are based on an established comparison between the existing federal Iraqi laws and regulations in place, and the existing laws and regulations established by the KRG. The recommendations are based on the evaluation of the effectiveness of the federal laws, and their applicability and benefits to the KRI if adopted and implemented by the KRG.

Short Term

- The Kurdistan Region of Iraq should unify and publicly publish noise control guidance. The directive would benefit from listing applicable legal provisions that are currently used in its regulation. The guidance should define the measurement protocols and meter calibration and clarify whether KRG should use regional law alongside the federal law as a benchmark

or apply the federal law directly. This would be the single most important step to reduce discretionary enforcement.

- The Kurdistan region should create a hotspot monitoring system across the three governorates of the Kurdistan region to enforce the noise limits; starting with roads, hospitals, schools, and public areas. Existing legal provisions already empower authorities to monitor noise levels, produce annual reports, and approve projects. However, a transparent public system to view and standardize the complaint workflow is necessary but lacking. As a first step, publish simple quarterly reports of complaint volumes, inspections, warnings, closures, and measured hotspot levels.
- KRG authorities should target the main sources of noise pollution immediately by enforcing rules that limit car horns and loudspeakers, setting restrictions on workshops or businesses that produce noise during night hours, and applying temporary noise reduction measures. This is legally feasible now and well aligned with the local evidence base.
- Operationalize the existing law in Iraq for a temporary period to protect the workers exposed to the high-frequency noise during their daily shift. Federal law already requires hearing tests for workers and mandates wearing protective gear. In the Kurdistan Region, the law already requires environmental monitoring and regulation. This obligation should be turned into a checklist based on the applicable standard for the area.

Medium Term

- Ring-fence financing for noise control within existing environmental funds. Neither the federal nor KRG legal frameworks create a dedicated noise fund, but both create general environmental funds or “boxes” that can finance monitoring, mitigation, and pollution removal. A practical next step is a small earmark for sound meters, calibration, municipal abatement works, school/hospital shielding, and public reporting infrastructure.
- Treat generator phaseout as a just-transition issue, not just a technical project. The KRSO documented 7,746 workers in the generator sector, and KRG reform materials confirm compensation arrangements with generator owners. A medium-term policy package should include worker retraining, transparent compensation criteria, and grievance channels so that noise reduction is not politically reversed by poorly managed transition costs.

- The governorate should institutionalize cross-sector stakeholder engagement. Use the governorate environmental committees already provided in KRG law to convene municipalities, health, education, electricity, transport, police, business associations, generator owners, and community leaders at regular intervals, with an annual public noise report. This is a low-cost way to improve legitimacy and compliance.
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Data Gaps and Interview Guide

The most important unresolved gaps are legal-operational rather than conceptual: what numeric limits KRG agencies currently enforce; whether a KRG noise standard exists in an unpublished or hard-to-find gazette; how many complaints, inspections, warnings, fines, and closures occur in practice; which agencies own sound meters and calibration capacity; how EIA follow-up is conducted after project approval; and how the phaseout of generator's related to the Runaki Project are affecting neighborhood sound levels and livelihoods. These gaps are substantial enough that validation through interviews with Razan Omar Ali and Dr. Zhino Khalid is essential before making strong claims about enforcement performance.

Footnotes

1. Yaldz Mohammed Basher and Shireen H Ramadhan, authors, "Determination of Traffic Induced Noise Pollution and Its Impact on The Citizens in The Zakho City Area," *Science Journal of University of Zakho (SJUZ)*, 10(2), 39–42, April 2022. [Read More ↔](#)
2. Hayder K. Abdulkareem, Lecturer, Department of Environmental Planning, Faculty of Physical Planning, University of Kufa, "Evaluation of Noise Pollution Indicators in Najaf City," *Kufa Journal of Engineering*, Vol.9, No.4, October 2018, pp.258–272. [Read More ↔](#)
3. Fadel al-Gharawi, President, Strategic Center for Human Rights in Iraq, quoted in "Iraqi Rights Group:80% of Population Exposed to Harmful Noise Pollution," *The New Region*, June 2024. [Read More ↔](#)
4. World Health Organization (WHO Regional Office for Europe), "Environmental Noise Guidelines for the European Region," WHO, October 2018. [Read More ↔](#)
5. World Bank, "Iraq Pollution Management and Environment Sustainability Project: Environmental and Social Impact Assessment," The World Bank, June 2022. [Read More ↔](#)
6. Ibid
7. KRG Statistics Office (KRSO), "Private Generators for Electricity in the Kurdistan Region," KRG Statistics Office (KRSO.gov.krd), 2021. [Read More ↔](#)
8. Nature Iraq, *Environmental Legislation Guides in Kurdistan Region – Iraq* (Nature Iraq, funded by the European Union under the Iraq Waterkeeper Environmental Law and Advocacy Project), n.d. [Read More ↔](#)
9. KRG Ministry of Environment, "Runaki Project to Shut Down 7,000 Private Generators Across the Kurdistan Region," KRG Department of Media and Information (gov.krd), June 2025. [Read More ↔](#)



ABOUT

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