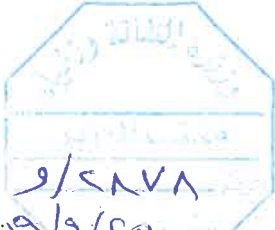




وزير الطاقة والمياه
الجمهورية اللبنانية
وزارة البيئة
٢ تموز ٢٠١٩

الوزير



٩/٢٨٧٨
٢٠١٩/٩/٢٥

بيروت، في ١٨/٩/٢٠١٩

رقم التسجيل: ٣٨٩٠/ب/٢٠١٩

معالي وزير الطاقة والمياه
السيدة ندى البستاني المحترمة

الموضوع: مطالعة وزارة البيئة حول دراسة التقييم البيئي الاستراتيجي للأنشطة البترولية في المياه البحرية اللبنانية

المرجع:	
-	القانون رقم ٤٤٤ تاريخ ٢٩/٧/٢٠٠٢ (حماية البيئة)
-	القانون رقم ٦٩٠ تاريخ ٢٦/٨/٢٠٠٥ (تحديد مهام وزارة البيئة وتنظيمها)
-	المرسوم رقم ٢٢٧٥ تاريخ ١٥/٦/٢٠٠٩ (تنظيم الوحدات التابعة لوزارة البيئة وتحديد مهامها وملاكها وشروط التعيين الخاصة في بعض وظائفها)
-	المرسوم رقم ٨٢١٣ تاريخ ٢٤/٥/٢٠١٢ (التقييم البيئي الاستراتيجي لمشاريع السياسات والخطط والبرامج في القطاع العام)
-	قرار وزير البيئة رقم ١/٥٨٩ تاريخ ٢١/١٢/٢٠١٥ (آلية مراجعة تقارير تحديد نطاق التقييم البيئي الاستراتيجي ودراسات التقييم البيئي الاستراتيجي)
-	قرار وزير البيئة رقم ١/٢٦٩ تاريخ ٢٩/٣/٢٠١٨ (تأليف لجنة تقنية لمراجعة دراسة التقييم البيئي الاستراتيجي لقطاع النفط والغاز في المياه البحرية اللبنانية)
-	دراسة التقييم البيئي الاستراتيجي للأنشطة البترولية في المياه البحرية اللبنانية المسجل في وزارة البيئة تحت الرقم ٣٨٩٠/ب/٢٠١٩، تاريخ ٢٦/٧/٢٠١٩

تحية طيبة،

إشارة الى الموضوع والمرجع المبينين أعلاه،

نودعكم ربطاً بتقرير اللجنة التقنية المكلفة مراجعة التقرير المشار إليه أعلاه والذي يبين مطالعة وزارة البيئة حول هذه الدراسة،

عليه، تفيدكم وزارة البيئة بموافقتها على الدراسة المذكورة شرط التقيد بالملاحظات المبينة في تقرير اللجنة التقنية المرفق، والذي يعتبر جزءاً لا يتجزأ من هذا الكتاب.

وتفضلوا بقبول فائق الاحترام.



وزارة البيئة
هيئة إدارة قطاع البترول
رقم التسجيل: ٣٨٩٠/ب/٢٠١٩
٢-١٠-٢٠١٩

مرفق ربطاً: تقرير اللجنة التقنية رقم ٣٨٩٠/ب/٢٠١٩ تاريخ ١٣/٩/٢٠١٩
نسخة تبلغ الى:

- هيئة إدارة قطاع البترول
- وزارة البيئة
- مصلحة التخطيط والبرمجة - مصلحة البيئة السكنية - مصلحة تكنولوجيا البيئة - مصلحة الدوائر الاقليمية والصابطة البيئية
- أعضاء اللجنة التقنية

وزارة البيئة، مركز للعاذارية، الطابق السابع، بلوك A-4 New

ص. ب.: ١١/٢٧٢٧، بيروت، لبنان - هاتف: ٩٧٦٥٥٥-١-٩٦١ + أو هاتف الرقم الرباعي: ١٧٨٩ - فاكس: ٩٧٦٥٣٠-١-٩٦١ +

صفحة الإنترنت: www.moe.gov.lb

Technical Report

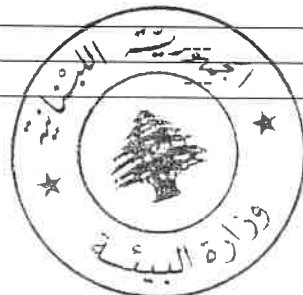
Subject: Revision of the Strategic Environmental Assessment for the Exploration and Production Activities Offshore Lebanon

- References:**
- Law 444 dated 29/7/2002 (Protection of the Environment)
 - Law 690 dated 26/8/2005 (Establishment of the Ministry of Environment and Identification of its mandates)
 - Decree 3275 dated 15/6/2009 (Organization of the Ministry of Environment's units and determining its functions and staffing and the special conditions of appointment in some of its positions)
 - Decree 8213 dated 24/5/2012 (Strategic Environmental Assessment Of Policy, Plan and Program Proposals in the Public Sector)
 - Minister of Environment decision 589/1 dated 21/12/2015 (Procedures of revision of Strategic Environmental Assessment Scoping Report and Strategic Environmental Assessment Report)
 - Minister of Environment decision 269/1 dated 29/3/2018 (Establishment of a Technical Committee to review the Strategic Environmental Assessment for the Exploration and Production Activities Offshore Lebanon)
 - Strategic Environmental Assessment for the Exploration and Production Activities Offshore Lebanon, registered at the Ministry of Environment under the number 3890/B/2018 dated 26/7/2019

Reference is made to the above mentioned subject and references;

The technical committee has the below comments:

Information required in the Strategic Environmental Assessment Report	Requested to be completed	Justification
Executive Summary	---	---
Project Description	---	---
Project Environmental Baseline	Update the air quality baseline based on the most recent AQMN data.	The status of the main air pollutants in Lebanon was based on outdated studies, the most recent AQMN data (2017-2019) was not taken into consideration during the assessment.
	Elaborate on the conflict that might result from laying pipelines on the railway's right of way (Volume 2, section 6.7.3.1).	Not elaborated in terms of mitigation measures and alternatives.
Project Alternatives	---	---
Potential Environmental	---	---



Information required in the Strategic Environmental Assessment Report	Requested to be completed	Justification
Impacts		
Compatibility With The Political, Legal And Planning Framework	---	---
Choosing the Best Project Alternative	---	---
Environmental Management Plan	Requirements for EIA Studies (section 10.4-Volume 1) should follow the full mitigation hierarchy and not focus only on offsetting.	Not addressed.
	Capacity building: The requirements for offshore survival courses and similar are missing. Such course certificates are usually essential to be allowed offshore, e.g. related to audit and study tours.	Not addressed.
	Follow international good practices such as the IFC EHS and WHO guidelines regarding noise which define noise limits at the receptor.	Needs to be modified or "85 dBA at 1m distance" limit from the source should be referenced.
	Define Ambient Air Quality Standards and Emission limits to be adopted (Volume 1, Section 10.1, Table 10.1).	Not clear which limits will be adopted.
	Detailed mapping for seagrass meadows in Lebanese shallow waters should be recommended in the SEA especially in areas that might be subject for construction activities. The results of the mapping must be given special attention in future activities.	Construction activities taking place in shallow waters (port extension, jetties, storage, etc.) may negatively impact the seagrass (Volume 2, section 8).
Amending the proposed project in accordance with the outcomes associated with the SEA	---	---
Conclusion	There is very limited information regarding expectation management, transparency, fiscal policy, etc. These issues should be stated in the conclusions (p. XI and Chapter 11) to not be watered down. It should be noted that the SEA should be cross-discipline while chapter 11 is currently focusing on environmental and social issues only.	Not addressed.
List of scientific references and reports	---	---

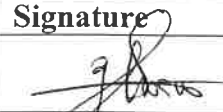
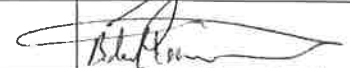
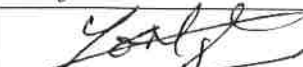
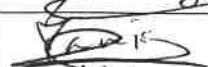


General comments on the report:

1. An integrated implementation plan (in the form of a detailed matrix) should be developed specifying the agreed actions of all involved parties throughout the relevant disciplines, necessary budgets, timelines and clear responsibilities, priorities, milestones and the process for progress monitoring. It is vital that the implementation planning considers the following:
 - Be in line with the Environmental Management Framework and translate the proposed mitigation measures into actions inside the implementation plan.
 - Not only environmental issues but also socio-economic, security, institutional capacity and other factors which should be presented in an integrated way.
 - Assessment of institutional capacity of the related entities to ensure their ability to execute the related actions.
 - Each entity should develop its individual action plan in line with the integrated implementation plan and commit to its execution.
 - The role and mandate of each party involved needs to be clearly identified taking into consideration the importance of establishing a strong multi-disciplinary steering committee with the relevant governmental mandate and decision-making powers.
2. The role and mandates of the task force should be described including their powers in the decision making process specifically towards the execution of the implementation plan.
3. The terminology/concept of exclusion zones, potential buffer zones and safety zones needs to be defined and consistently applied throughout the SEA.
4. Chemicals and Waste management plans, chemicals database, emergency plan, oil spill contingency plan developed by the operators should be included in the EIA.

Reference to the above, the technical committee suggests approving the SEA Report, provided that all the above comments are taken into account. The updated and final report must be re-submitted to the Ministry of Environment for final review.

Technical Committee members:

Name	Position	Service	Signature
Sabine Ghosn	Head	Urban Environment	
Bilal Ismail	Reporter Member	Regional Departments and Environmental Police	
Yara El Moghrabi	Member	Planning and Programming	
Daniah Turjman	Member	Environmental Technology	
Sandy Ardo	Member	Environmental Technology	