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MEDITERRANEAN ACTION PLAN

1st Offshore Protocol Working Group Meeting

Valletta, Malta, 13-14 June 2013

OFFSHORE IMPLEMENTATION ASSESSMENT

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Introduction:

According to the Decision IG.20/12 of the 17th Ordinary Meeting of the Contracting Parties to the Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean and its Protocols, Paris (France), 8-10 February 2012, related to the Action Plan to implement the Protocol of the Barcelona Convention concerning the Protection of the Mediterranean Sea Against Pollution Resulting from Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil, hereinafter referred to as "Offshore Protocol" The Coordinating Unit is requested "to establish an ad hoc working group coordinated by REMPEC composed of representatives of the Contracting Parties and observers from representatives of the concerned industries, relevant international organizations and MAP partners with a view to lead the work for preparing an in depth assessment and stock taking analysis of the existing practical measures in place in the Mediterranean countries with regard to Offshore activities as a baseline to measure progress towards Protocol implementation in the future.

The aim of this questionnaire is to map the existing legislative and administrative framework in the region. The questionnaire covers, in a thematic approach, all issues raised in the different chapters and annexes of the Protocol.

Taking into account the diversity of the subjects dealt within the question, the Offshore Protocol national representative is expected to organize at national level the necessary consultations with the authorities having competences as regards the various aspects of offshore activities.

Whilst completing the questionnaire, competent authorities are kindly requested to identify national regulations already in place according to obligations raised under other international legal instruments, in view of establishing possible links between this instrument and the Protocol and avoid duplications.

Bearing in mind that the protocol was adopted in 1994, if, when filling this questionnaire, you identify topics relevant to offshore exploration and exploitation which you think are not addressed in the Protocol, please insert comments in part VI of the questionnaire.

Country	
Offshore Focal Point name	
Authority	

¹ The Offshore Protocol to the Barcelona Convention adopted on 14 October 1994 (Madrid, Spain) entered into force on 24 March 2011. The Offshore Protocol has so far been ratified by Albania, Cyprus, Libya, Morocco, Syria and Tunisia. On 17 December 2012, the Council of the European Union also adopted the Protocol.

I. <u>AUTHORIZATION SYSTEM</u>

	Yes	No	Please specify the legislative need be) and shortly descripted requirements	
Are minimum requirements defined for granting authorization in your country?				
Do you require environment impact assessment?				
Are the requirements different whether the authorization relates to the exploration operation or to the production operations?				
Does the required environment impact assessment contain at least the following?				
			Exploitation	Production
 Definition of the geographical area where the activity is envisaged including safety zone? 				
 Description of the initial state of the environment of the area 				
 Indication of the nature, aims, scope and duration of the proposed activity? 				
 Description of the methods, installation and other means to be used, possible alternatives to such methods and means? 				
 Description of the foreseeable direct or indirect short and long- term effects of the proposed activities on the environment, including fauna, flora and the ecological balance? 				
 Statement setting out the measures proposed for reducing to the minimum the risk damage to the environment as a result of carrying out the proposed activities, including possible alternative measures? 				
 Indication of the measures to be taken for the protection of the environment from pollution and other adverse effects during and after the proposed activities? 				
 A reference to the methodology used for the environmental impact assessment? 				
 Indication of whether the environment of any other State is likely to be affected by the proposed activities? 				
Do you require composition of the crew and their qualifications ?				

Do you require safety measures				
Do you require operator's contingency plan				
Do you require monitoring procedure				
Do you require insurance or other financial security to cover liability				
and compensation				
Do you require precautions for specially protected areas				
In addition to measures referred to the Protocol concerning				
Mediterranean Specially Protected Areas for the granting of authorization				
are measures in place for:				
Preparation and evaluation of environmental impact assessment				
Elaboration of special provision concerning monitoring, removal				
of installations and prohibition of any discharge				
Intensified exchange of information				
Have you identified the authority responsible for granting, renewal				
and registration of authorization? If yes, please provide its contact				
details below, if not please indicate in the most suitable authority in your				
country for this matters.				
Name of the authority:				
Tel:				
Fax:				
Email				
Do you distinguish permit authorization related to the exploitation of				
the continental shelf as a national heritage (exploration) from licence				
authorization related to production operations?				
If the answer to the previous question, please provide the contact details	of the c	orresp	onding authorities if the respon	sibility are share by different
authorities.				
Name of the authority for permit				
authorization:				
Tel:				
Fax:				
Email				
Name of the authority for				
licence authorization:				
Tel:				
Fax:				
Email			T	
Does your regulations differentiate responsibilities based on jurisdiction				

criteria (e.g. 12 Nm limit)					
If the answer to the previous question is yes, please provide details on the related regulation(s) and specify the name of the competent authorities					
and their responsibilities.					
	T	1			
Do you require removal plan?					
Do the competent authorities requires to remove abandoned and					
disused (even when authorization withdrawn or suspended)					
installations?					
Have the competent authorities define the standards for the removal of					
abandoned and disused installations?					
Have you identified the authority in charge of supervising the					
removal operations of offshore installations? If yes, please provide its					
contact details below, if not please indicate in the most suitable authority					
in your country for this matters.					
Name of the authority:					
Tel:					
Fax:					
Email:					
Do you have measures in place to impose sanctions for breach of					
obligations arising out of the Protocol, or for non-observance of the					
national laws or regulations implementing the Protocol, of for non-					
fulfilment of the specific conditions attached to the authorizations?					

II. <u>DISPOSAL AND DISCHARGES</u>

A. WASTE AND HAZARDOUS AND NOXIOUS SUBSTANCES & MATERIAL (HNS&M)

		Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements
Do you hay	re any measure in place to approve the use of chemicals			be) and shortly describe the minimum requirements
•	in the Chemical Use Plan?			
	uire operators to communicate its Chemical Use Plan?			
•	•			
•	lefine the limitation and prohibition for the use of			
chemicals				
	NS&M used do you require the manufacturer compound			
description				
	osal of the following HNS&M resulting from offshore activities			
prohibited				
	rcury and mercury compounds?			
• Ca	dmium and cadmium compounds?			
 Or 	ganotin compounds and substances which may form such			
comp	ounds in the marine environment?			
• Or	ganophosphorus compounds and substances which may			
form s	such compounds in the marine environment?			
• Or	ganohalogen compounds and substances which may form			
	compounds in the marine environment?			
• Cr	ude oil, fuel oil, oily sludge, used lubricating oils and refined			
produ	cts?			
• Pe	sistent synthetic materials which may float, sink or remain in			
suspe	nsion and which may interfere with any legitimate use of the			
sea?	, , ,			
• Su	bstances having proven carcinogenic, teratogenic or			
	enic properties in or through the marine environment?			
• Ra	dioactive substances, including their wastes, if their			
discha	arges do not comply with the principles of radiation protection			
	ined by the competent international organizations, taking into			
	nt the protection of the marine environment?			
	roducts disposal prohibited?			Please specify which ones:
	isposal of the following HNS&M resulting from offshore			

activities requi	re a special permit in your country?		
Arsenic	3		
• Lead			
 Coppe 	r		
• Zinc			
Berylliu	ım		
 Nickel 			
 Vanadi 	ium		
• Chrom	ium		
	es and their derivates not covered in the above list of		Please specify which ones
prohibited			
• Seleniu	ım		
 Antimo 	ony		
 Molybo 	denum		
 Titaniu 	m		
• Tin			
Barium	(other than barium sulphate)		
• Boron			
• Uraniu	m		
 Cobalt 			
• Thalliu	m		
• Telluriu	um		
 Silver 			
 Cyanid 	es		
	ducts disposal require a special permit?		
	resulting from offshore activities which may cause		
	ires a prior general permit from the competent		
authority?			
	cedure for issuing special permit for the disposal of account the following factors:		
	cteristics and composition of the waste:		•
Type a	nd size of waste sources (e.g. industrial process)		
Type o	f waste (origin, average composition)		
Form c	of waste (solid, liquid, sludge, slurry, gaseous)		

•	Total amount (Volume discharged, e.g. per year)			
•	Discharge pattern (continuous, intermittent, seasonally variable,			
	etc.)			
•	Concentrations with respect to major constituents, substances			
	listed above) and other substances as appropriate			
•	Physical, chemical and biochemical properties of the waste			
	B. Characteristics of waste constituents with respect to their ha	rmfuln	ess	
•	Persistence (physical, chemical, biological) in the marine environment			
•	Toxicity and other harmful effects			
•	Accumulation in biological materials or sediments			
•	Biochemical transformation producing harmful compounds			
•	Adverse effects on the oxygen content and balance			
•	Susceptibility to physical, chemical and biochemical changes			
	and interaction in the aquatic environment with other sea-water			
	constituents which may produce harmful biological or other effects			
	on any uses listed in the factor E below:			
	C. Characteristics of discharges site and receiving marine envir	onmen	t	
•	Hydrographic, meteorological, geological and topographical			
	characteristics of the area			
•	Location and type of the discharge (outfall, canal, outlet, etc.)			
	and its relation to other areas (such as amenity areas, spawning,			
	nursery and fishing areas, shellfish grounds) and other discharges			
•	Initial dilution achieved at the point of discharge into the			
	receiving marine environment			
•	Dispersion characteristics such as effects of currents, tides and			
	wind on horizontal transport and vertical mixing			
•	Receiving water characteristics with respect to physical,			
	chemical, biological and ecological conditions in the discharge area			
•	Capacity of the receiving marine environment to receive waste			
	discharges without undesirable effects			L Park and for 'n harte's laffly and a samellar
	D. Availability of waste technologies: Does the methods of was			
	domestic sewage are selected taking into account the availal		id feas	sibility or:
•	Alternative treatment processes			
•	Reuse or elimination methods			
•	On-land disposal alternatives			
•	Appropriate low-waste technologies			

	es				
Effects on human life through pollution impact on:					
(a) Edible marine organisms					
(b) Bathing waters					
(c) Aesthetics					
Effects on marine ecosystems, in particular living resources,					
endangered species and critical habitats					
Effects on other legitimate uses of the sea in conformity with					
international law					
Specify other factors considered in your procedure if different from the					
above.					
Have you identified the authority in charge of issuing and registering					
the special and general permits the use of HNS&M? If yes, please					
provide its contact details below, if not please indicate in the most					
suitable authority in your country for this matters.					
Name of the authority:					
Tel:					
Fax:					
Email:					
B. OIL AND OILY MIXTURES AND DRILLING FLUID AND	CUTTI	NGS			
D. OIL AND OILT WINTONLO AND DIVILLING FLOID AND OUT TINGO					
	Yes	No	Please specify the legislative/regulatory reference (if need		
	Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements		
Have standards for disposal of oil and oily mixtures from	Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements		
Have standards for disposal of oil and oily mixtures from installations been defined?					
installations been defined?					
installations been defined? Do these standards prescribe the following provisions?					
 installations been defined? Do these standards prescribe the following provisions? Spills of high oil content in processing drainage and platform drainage shall be contained, diverted and then treated as part of the product, but the remainder shall be treated to an acceptable level 					
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Do your standards meet the following threshold?		
 machinery space drainage (max oil content 15m/l whilst undiluted) 		
 production water (max. 40mg/l as average in monthly calendar 		
& always less than 100mg/l)		
Have you define a method to analyse oil content		
Have standards for the use of disposal of oil and oily mixtures from		
installations been defined?		
Is the use and disposal of water-based drilling fluids and		
cuttings subject to the Chemical Use Plan		
Is the disposal of the water-based drilling fluids and cuttings		
either made on land or into the sea in an appropriate site or area		
specified by the competent authority?		
Do you grant permit for the use of oil-based drilling fluids		
restricted to fluids with low toxicity		
Have you define the threshold of such toxicity level?		
Do you prohibit the disposal of oil-based drilling fluids into the		
sea?		
Do the disposal of drill cuttings subject to a permit delivered with		
the conditions that efficient solids control equipment is installed and		
properly operated, that the discharge point is well below the surface		
of the water and that the oil content is less than 100 grams of oil		
per kilogram dry cuttings?		
Is the disposal of drill cuttings prohibited in specially protected		
areas?		
In case of production and development drilling, do you		
undertake a programme of seabed sampling and analysis relating to the zone of contamination		
Do you prohibit the use of diesel-based drilling fluids?		
Have you identified the authority in charge of issuing and registering		
the permits for the use of oil and oily mixture and drilling fluids and		
cuttings? If yes, please provide its contact details below, if not please		
indicate in the most suitable authority in your country for this matters		
Name of the authority:	I	<u>l</u>
Tel:		
Fax:		

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Email:	
Email:	

C. SEWAGE

	T	١	
	Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements
Do you prohibit discharge of sewage from installations permanently			
manned by 10 or more persons?			
Have you define exceptions for			
Discharging treated sewage at least 4 nautical miles from land			
of fixed fisheries installation			
Discharging non-treated sewage			
Discharging sewage treated through certified sewage treatment			
plant			
Do you prohibit discharge of sewage from installation which is visible,			
contains floating solids or produces colouration, discolouration or			
opacity of water?			
Is the exception above not applicable for discharge of sewage from			
installation which is visible, contains floating solids or produces			
colouration, discolouration or opacity of water?			
If the sewage is mixed with waste, HNS&M, do you apply the most			
stringent requirement?			
Do the provisions are stricter in the proximity of specially protected			
areas taking into account currents?			
Have you identified the authority in charge of the approval of sewage			
treatment systems and of the certification of sewage treatment			
plants? If yes, please provide its contact details below, if not please			
indicate in the most suitable authority in your country for this matters.			
Name of the authority:			
Tel:			
Fax:			
Email:			

D GARBAGE

D. GARBAGE			
	Yes	No	Please specify the legislative/regulatory reference (if need
			be) and shortly describe the minimum requirements
Do you prohibit the disposal of plastics , including synthetic ropes,			
synthetic fishing nets and plastic garbage bags?			
Do you prohibit the disposal of other non-biodegradable garbage			
including paper, products, rags, glass, metal, bottles, crockery, dunnage,			
lining and packing materials?			
Is the disposal of food waste regulated according to MARPOL Annex			
· · · · · · · · · · · · · · · · · · ·			
If garbage mixed do you apply the most stringent requirement?			
E. RECEPTION FACILITIES, INSTRUCTIONS AND SANCT	FIONS		
	Yes	No	Please specify the legislative/regulatory reference (if need
			be) and shortly describe the minimum requirements
Do you have onshore reception facilities for disposal of waste and			
HNS&M?			
Do you monitor satisfactory disposal of waste and HNS&M in			
designated onshore reception facilities?			
Do you request that all personnel of the installation are provided with			
instruction on proper means of disposal?			
Are sanctions in place for illegal disposal?		П	
If onshore reception facilities cannot treat or are not existent to dispose of			ad UNS8M, what are the measures in place?
il distible reception facilities carifiot treat of are not existent to dispose of	uie wa	isie ai	u rinoxin, what are the measures in place?
			T
Does your regulation foresee transboundary movement of these waste			
and HNS&M			
If the answer to the previous question is yes, does this regulation has bee			
Convention, Protocol on the Prevention of Pollution of the Mediterranean	Sea by	Trans	boundary Movements of Hazardous Wastes and their
Disposal,etc). Please specify, hereunder:			
·			

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F. EXCEPTIONS

		Yes	No	Please specify the legislative/regulatory reference (if need
				be) and shortly describe the minimum requirements
Do you	apply exceptions to the provision listed in the section II.A, II.B,			
II.C, II.	D, II.E in case of?:			
•	Force majeur and in particular for disposals:			
a)	To save human life			
b)	To ensure the safety of installation			
c)	In case of damage to the installation or its equipment			

III. <u>SAFETY MEASURES</u>

	Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements
Do you ensure safety measure taken with regards to design,			
construction, placement, equipment, marking, operation and			
maintenance of installations?			
Do you ensure that operator has on the installation adequate			
equipment and devices for protecting human life, preventing and			
combating accident pollution according to contingency plan?			
Do you require a certificate of safety and fitness issued by recognized			
body?			
Have you identified the competent authority in charge of issuing			
certificate of safety and fitness? If yes, please provide its contact			
details below, if not please indicate in the most suitable authority in your			
country for this matters.			
Name of the authority:			
Tel:			
Fax:			
Email:			
Do you require that the installation must be safe and fit the purpose for			
which is to be used, in particular, that it is designed and constructed so			
as to withstand, together with its maximum load, any natural condition,			
including, more specifically, maximum wind and wave conditions as			
established by historical weather patterns, earthquake possibilities,			
seabed conditions and stability, and water depth?			
Do you require that all phases of the activities, including storage and			
transport of recovered resources is properly prepared ?			
Do you require that the whole activity is open to control for safety			
reasons and conducted in the safest possible way?	<u> </u>		
Do you require that the operator applies a monitoring system for all			
activities?	1		
Do you require that the most advanced safety systems is used and			
periodically tested in order to minimize the dangers of leakages,			

	spillages, accidental discharges, fire, explosions, blow-outs or any other threats to human safety or the environment		
ŀ	Do you require that a trained specialized crew to operate and maintain		
	these most advanced safety systems are present and that this crew		
	undertake periodic exercises .		
ŀ	In case of authorized not permanently manned installations , do you	П	
	require that the permanent availability of a specialized crew is		
	secured?		
İ	Do you require that the installation and, where necessary, the		
	established safety zone is marked so as to give adequate warning of		
	its presence and sufficient details for its identification?		
ĺ	Do you require that the installations are indicated on charts and		
	notified to those concerned?		
	Do you require that, in order to secure observance of the above		
	mentioned requirements, the person and/or persons having the		
	responsibility for the installation and/or the activities, including the		
	person responsible for the blow-out preventer, must have the		
	qualifications required by the competent authority (training, on a		
	continuing basis in safety and environmental matters), and that sufficient		
ļ	qualified staff must be permanently available?		
	Have you identified the competent authority in charge of inspections		
	to ensure that activities safety measures are carried by the operators? If		
	yes, please provide its contact details below, if not please indicate in the		
ļ	most suitable authority in your country for this matters.		
ļ	Name of the authority:		
ļ	Tel:		
ļ	Fax:		
	Fmail:		

IV. MONITORING OF ENVIRONMENT RELATED ISSUES

		Yes	No	Please specify the legislative/regulatory reference (if need
				be) and shortly describe the minimum requirements
Do operators report periodically to the co	ompetent authorities			
monitoring data to assess the effects of a	ctivities on the environment?			
Have the competent authorities establishe	ed a national monitoring			
system to support decision making proces	s for granting authorizations?			
Do the national monitoring system takes in	to account any adverse			
environment effects of activities within the	limits or beyond the			
country jurisdiction				
Have you identified the competent author	ity in charge of establishing			
monitoring procedures? If yes, please pro				
below, if not please indicate in the most sui	table authority in your country			
for this matters.				
Name of the authority:				
Tel:				
Fax:				
Email:				

V. <u>PREPAREDNESS AND RESPONSE</u>

A. CONTINGENCY PLANNING

		Yes	No	Please specify the legislative/regulatory reference (if need
				be) and shortly describe the minimum requirements
Are	authorities in charge of responding to marine pollution resulting from			
	shore activities aware of the provisos of the Prevention and			
	ergency Protocol in case of emergency?			
	you require operators to have contingency plan coordinated with			
	national contingency plan?			
Do	you oblige operators:			
•	That the most appropriate alarm system and communication			
	system are available at the installation and they are in good			
	working order?			
•	That the alarm is immediately raised on the occurrence of an			
	emergency and that any emergency is immediately			
	communicated to the competent authority?			
•	Are operators required to notify competent authorities of any			
	event causing or likely to cause pollution or any observed event			
	causing or likely to cause pollution			
•	Are the contact details of the competent authorities in			
	charge of receiving pollution notification communicated to the			
	operators?			
•	That the immediate information about the nature and extent			
	of the emergency is given to the crew on the installation and to the			
	competent authority?			
•	That the competent authority is constantly informed about			
	the progress of combatting the emergency?			
•	That at all times sufficient and most appropriate materials and			
	equipment, including stand-by boats and aircraft, are available to			
	put into effect the emergency plan?			
•	That the most appropriate methods and techniques are			
	known to the specialized crew, in order to combat leakages,			
	spillages, accidental discharges, fore, explosions, blow-outs and			

any other threat to human life or the environment?			
That the most appropriate methods and techniques are known			
to the specialized crew responsible for reducing and preventing			
long-term adverse effects on the environment?			
That the crew is thoroughly familiar with the operator's			
contingency plan, that periodic emergency exercises are held			
so that the crew has a thorough working knowledge of the			
equipment and procedures and that each individual knows exactly			
his ole within the plan?			
Do you require operators to cooperate, on an institutional basis , with			
other operators or entities capable or rendering necessary assistance ,			
so as to ensure that, in cases where the magnitude or nature of an			
emergency create a risk which assistance is or might be required, such			
assistance can be rendered?			
Are the measures in place to assist the competent authority for			
emergencies to ensure:			
The coordination of the national contingency plan and/or			
procedures and the operator's contingency plan and control of			
the conduct of actions, especially in case of significant adverse			
effect of the emergency?			
Direction to the operator to take any action it may specify in			
the course of preventing, abating or combatting pollution or in the			
preparation of further action for that purpose, including placing an			
order for relief drilling rig, or to prevent the operator from taking any			
specified action?	<u> </u>		
The coordination of actions in the course of preventing,			
abating or combatting pollution or in the preparation of further			
action for that purpose within the national jurisdiction with such			
action undertaken within the jurisdiction of other States or by			
international organizations?	 	_	
Collection and ready available of all necessary information			
concerning the existing activities?	<u> </u>		
The provision of an up-to-date list of the persons and entities			
to be alerted and informed about an emergency, its development			
and the measures taken?			
The collection of all necessary information concerning the			
extent and means of combating contingencies, and the			
dissemination of this information to interested Parties?			

The coordination and supervision if the assistance referred		
above, in cooperation with the operator?		
The organization and if necessary, the coordination of specified		
actions, which might be affected by a contingency to enable them to		
take appropriate measures where necessary?		
The provision of technical assistance to other Parties, if		
necessary		
Immediate communication to the competent international		
organizations with a view to avoiding danger to shipping and		
other interests?		
Have you establish a coordination approval procedure for the		
development of contingency plan?		
Does the plan take into account the measures in place for the		
coordination of international assistance in case of emergency		
Is the procedure in accordance with the measures in place for the		
coordination of international assistance in case pollution from		
ships?		
Do the procedure includes notification to REMPEC and Parties likely		
to be affected by a pollution resulting from offshore activities to		
provide timely information to evaluate the required measures		
Does the plan includes measures to avoid pollution beyond the		
limits of the country jurisdiction		
Have you taken special measures in conformity with international law, in		
particular with the Protocol concerning Mediterranean Specially		
Protected Areas, either individual or through multilateral or bilateral		
cooperation to prevent, abate, combat and control pollution arising from		
activities in specially protected areas.	 	
Is the discharge of substances containing oil or HNS&M can be		
used subject to pre-approval of the competent authority for combating		
pollution incidents?		
Have you identified the competent authority in charge of the pre-		
approval of discharge of substances containing oil or HNS&M for		
their use in combating pollution incidents? If yes, please provide its		
contact details below, if not please indicate in the most suitable authority		
in your country for this matters.		
Name of the authority:		
Tel:		
Fax:		

Email:				
Have you identified the competent a				
coordination and direction of offsh				
national plan? If yes, please provide				
please indicate in the most suitable a	uthority in your country for this			
matters.				
Name of the authority:				
Tel:				
Fax:				
Email:				
B. COOPERATION				
		Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements
Is your government engaged in any c	ooperation in research and			
development programme to minimize	risk of pollution?			
Is your government engaged in any c	ooperation in research and			
development programme to prevent a	and respond to pollution?			
Is your government implementing any	programme of assistance to			
developing countries in the field of so				
technology to prevent, combat and co				
acquisition, utilization and production				
C. LIABILITY AND COM				
		Yes	No	Please specify the legislative/regulatory reference (if need be) and shortly describe the minimum requirements
Are measures in place to ensure liab	lity is imposed on operators to			
require the payment of prompt and a	dequate compensations for			
damage resulting from offshore activi	ties?			
Are measures in place to ensure that	operators have and maintain			
insurance cover or other financial sec	curity to compensate damages?			
Do you consider granting equal access				
administrative proceedings to person				
pollution or other adverse effect of of				

VI. <u>IMPLEMENTATION LIMITATIONS AND OTHER COMMENTS</u>

Kindly specify any particular limitation for the implementation of the Protocol:

Implementation limitations	Yes	No	If, yes please specify		
Limited resources in the country					
Limited training person in the country					
Limited Offshore activities					
Limited regulations to cover all the Protocols subjects					
Limited structure to cover all the Protocols subjects					
Required update of the Annexes of the Protocol to ensure the implementation in accordance with up to date best practices (e.g. list of Annex II)					
For European Union (EU) Member States, do you foresee any contradiction between the Protocol requirements and other EU regulations?					
Other limitations					
Please add any other relevant comments in the following field.					