Lebanese Oil & Gas Initiative
المبادرة اللبنانية للنفط والغاز

A Guidebook for the Civil Society on the NOSCP for Lebanon

November, 2020

Disclaimer:

This document is based primarily on the first version of the National Oil Spill Contingency Plan (NOSCP) for Lebanon, issued in 2016. It is a guidance document and was not designed to preclude the NOSCP document or any existing laws or agency-specific policies. While it relies to a great extent on the text of the NOSCP, it only includes selections considered relevant to the objectives of this document. Hence, in the case of any uncertainty in the information presented, the original NOSCP text supersedes. It is also important to note that the NOSCP is a live document that will be continuously updated. Hence, some of the information presented here might be modified in future Plan updates

Commissioned by:
Lebanese Oil and Gas Initiative (LOGI)

Funded by:
Friedrich Ebert Stiftung (FES)

Prepared by:
Rania A. Marouny

Table of Contents

List of Figures

List of Tables

Abbreviations

CBO	Community-based Organization
DGLMT	Directorate General of Land and Maritime Transport
EEZ	Exclusive Economic Zone
HSE	Health, Safety and Environment
ICS	Incident Command Structure
LAF	Lebanese Armed Forces
LPA	Lebanese Petroleum Administration
MOA	Ministry of Agriculture
MOE	Ministry of Environment
MOEW	Ministry of Energy and Water
MOF	Ministry of Finance
MOIM	Ministry of Interior and Municipalities
MOI	Ministry of Information
MOJ	Ministry of Justice
MOL	Ministry of Labor
MOPH	Ministry of Public Health
MOPWT	Ministry of Public Works and Transport
NCA	National Competent Authority
NGO	Non-Governmental Organization
NOR	National Operations Room
NOSCP	National Oil Spill Contingency Plan
NOSIC	National Oil Spill Incident Commander
PPE	Personal Protective Equipment
SOPs	Standard Operating Procedures
VRC	Volunteer Reception Center

Lebanese Oil & Gas Initiative
المبادرة اللبنانية للنفط والغاز

A Guidebook for the Civil Society on the NOSCP for Lebanon

1. Introduction

The National Oil Spill Contingency Plan (NOSCP) for Lebanon, also referred to in this Guidebook as the Plan, was developed in 2016. It addresses the response to oil spills in the Public Maritime Domain including the Territorial Sea, and the Exclusive Economic Zone (EEZ). The aim of the NOSCP is to protect human life, the natural resources, as well as the economy and preserve the coastal and marine environment from any adverse effects of an oil spill. This plan ensures the continuous commitment of the Lebanese Government with its national and international obligations.

The objectives of this NOSCP are to:

- Ensure preparedness and readiness of the involved entities
- Establish a mechanism for mutual understanding among governmental and non-governmental entities, private and public sector organizations, and international agencies to co-ordinate and integrate their resources to respond effectively
- Ensure the timely and effective response to oil spills and prevent further pollution
- Identify the national high-risk areas and priority coastal areas for protection and clean-up
- Establish processes for assistance and cooperation with other countries and international agencies

The civil society in Lebanon can assume several roles to assist the NOSCP in meeting its objectives:

1. **Put pressure on the government to address the gaps and needs at the prevention, preparedness, and response levels, identified for the successful implementation of the NOSCP.**
2. **Raise awareness on oil spill contingency.**
3. **Act as a watchdog to ensure that the governmental authorities and the private sector are assuming their roles defined in the NOSCP and taking responsibility of their actions**
4. **Provide support to the governmental authorities (technical expertise, human resources, etc.) during the response to a spill.**

In order to instigate the support and involvement of the civil society in the successful implementation of the NOSCP, this guidebook summarizes the main elements of the NOSCP that would be of interest to members of the civil society, highlighting the potential role of the Civil Society for each element. **Note that this guidebook does not replace the NOSCP. It is highly recommended for interested organizations to refer to the full NOSCP as a reference.**

2. The NOSCP

The NOSCP was prepared in implementation of Lebanon's general obligations under several international conventions (NOSCP Volume A- Section 1.4), but more specifically under the Oil Pollution Preparedness, Response and Cooperation Convention, 1990 (OPRC) ratified by Law No. 605 dated 20 November 2004.

At the national level, the NOSCP was prepared in implementation of the following legislation:

1. Environmental Protection Law No. 444/2002 under which the Ministry of Public Works and Transport- Directorate General of Land and Maritime Transport (MOPWT-DGLMT), the Ministry of Environment (MOE) and the competent authorities are required to cooperate for the protection of the marine environment from pollution, including developing plans and managing shoreline protection activities (article 29.2). In addition, it is required to take the necessary measures to prevent marine pollution resulting from ships, marine transport vessels, vehicles or erections in the Lebanese territorial waters (article 32).

2. Under the Petroleum Activities Regulations issued by Decree No. 10289/2013, the offshore operators are required to prepare and regularly update and develop an emergency response plan. (Article 138). It would be useful if the ERP is compatible with the NOSCP

Accordingly, Lebanon has developed this NOSCP with a response system that features an integrated structure, which clearly defines responsibilities when responding to an oil spill situation, and yet allows sufficient flexibility to adapt to changing or unforeseen circumstances. The NOSCP provides a strategic and operational overview intended to inform and guide Government Departments, Governorates, Municipalities, Environmental, Port and Harbor Authorities, Health bodies and senior managers of response organizations - including those of industry. It is based on the principle that after preserving human life, the key priorities are to protect human health, protect the marine and terrestrial environment, protect the country's socio-economic assets and ensure that everyone is informed.

This plan defines the response to maritime oil spills in the Maritime Public Domain of the Republic of Lebanon which includes the shoreline, the Territorial Sea and the Exclusive Economic Zone (EEZ). In addition, it includes the response to oil spills entering the Lebanese EEZ from external sources. It does not cover Hazardous and Noxious Substances spills (HNS) or overboard loss of shipping containers, which can be added in later updates of the Plan.

The NOSCP consists of four volumes (Box 1). Volumes A and C are the main volumes as they describe Strategy and Processes (Volume A) and Roles and Responsibilities (Volume C). These volumes are available in English an Arabic. As for Volume B, it presents the risk assessment and oil spill modeling that was the basis for defining the national response strategy in Volume A. Volume D provides support documents on various issues associated with the successful implementation of the NOSCP.

Box 1: The NOSCP

Volume A- Strategy and Processes

1. Introduction
2. Oil Spill Prevention
3. Preparedness
4. Response
5. National Response Strategy
6. Recovery
7. Annexes

Volume B – Risk Assessment

1. Introduction
2. Risk Assessment
3. Oil Spill Modeling
4. Conclusion
5. Annexes

Volume C – Roles and Responsibilities

1. Introduction
2. Incident Command Structure
3. Lebanese National Oil Spill Response Organization Responsibilities by Stakeholder
4. Key Responsibilities and Tasks

Volume D – Supporting Documents

1. Training and Exercise
2. Guidance for the Development of Tier 1 Plans
3. Behavior and Fate of Oil
4. Response Strategy Guidance
5. Spill Sampling
6. Environment and Socio-economic Sensitivities
7. Waste Management
8. Use of Dispersant
9. Wildlife Response
10. Media and Community Response
11. Health, Safety, and Security
12. Management of Volunteers
13. Annexes

Volume A1- Strategy and Processes (In Arabic)

Volume C1 – Roles and Responsibilities (In Arabic)

Note that it was the Lebanese Petroleum Administration (LPA), who spearheaded the development of the NOSCP to meet international requirements as well as the recommendations of the Strategic Environmental Assessment for the development of the offshore oil and gas sector. The LPA is currently working on issuing the NOSCP as a decree to make it legally binding for all institutions to assume their roles defined by the NOSCP and pre-approved by them during the extensive stakeholder engagement process conducted throughout the development of the NOSCP.

2.1 Prevention

"Prevention of oil spills will always be preferable to the costly and long-term damage that oil spills can cause to environmental and socio-economic resources." The NOSCP highlights the existing legal provisions for the prevention of oil spill prevention from various sources **(NOSCP Volume A- Section 2)** as well as the existing gaps. **Hence, the Civil Society can play an important role at the prevention level to push for strengthening the prevention measures to avoid oil spill events as outline below.**

- Spill Prevention from Land Based Sources (industrial and oil handling facilities, such as factories, storage areas, oil terminals and automobile filling stations that have any oil discharge to drains, streams or any watercourses):
    - Push for the issuance of a decree by the Council of Ministers, upon the proposal of both the ministers of Environment and of Public Works and Transport, in accordance with Article 30 of Law 444/2002, that establishes a permitting system for the discharge of limited amounts of oil (permit would be provided by the MOPWT-DGLMT according to Article 31 of Law 444).
    - Push MOE to set maximum allowable discharge limits for liquid waste discharged into water bodies, particularly the sea, from existing and new oil handling facilities and enforce the use of oily water separator or interceptor on drains capable of reducing the oil concentration in the discharge to the level specified by MOE.

- Spill Prevention from Oil Terminals:
    - Ensure Decree No. 5509 11/8/1994, which requires that all oil terminals be legally licensed, is properly enforced. This Decree determines the general regulatory requirements for the establishment, construction and operation of installations for petroleum derivatives and liquid petrochemical products as well as for transport tankers and distribution stations for petroleum products. Chapter 3.4 of the decree states the requirements for environmental protection from an oil.
    - Ensure that all new shoreline oil installations are correctly sited after approval by MOPWT-DGLMT and that the hazard to people and the environment beyond the site boundary are taken into consideration as part of Environmental Impact Assessment studies as stipulated by Decree 8633/ 2012.

- Spill Prevention in Ports and Harbors
    - Ensure inspection of facilities and bunkering procedures are made in line with ratified international conventions and national legal requirements.

- Spill Prevention from Vessels in Lebanese ports
    - Ensure MOPWT-DGLMT is safeguarding that vessels calling at the Lebanese Ports are inspected for compliance with international regulations (MARPOL, OPRC, and the Mediterranean Memorandum of Understanding on Port State Control) and that all tankers are carrying a Certificate of Insurance under the Civil Liability Convention.

- Spill Prevention from Offshore Installations
    - Ensure that the requirements for spill prevention from offshore installations defined in the OPRL (132/2010) and PAR (10289/2013) are implemented. These include (1) OPRL articles 29.1, 29.3, and 32, requiring a detailed EIA study as part of any plan for "Development, Production, Transportation, storage or utilization" submitted by the operator on behalf of the Right Holder; and (2) PAR requirements for well drilling, the establishment of offshore facilities, as well as Health Safety and Environmental requirements that contribute to the prevention of spills for offshore activities.

2.2 Preparedness

2.2.1 The National Plan

The actual development of the NOSCP was a crucial primary step towards the country's preparedness to oil spill incidents. The second step would be the issuance of the NOSCP decree to institutionalize and legalize the roles of all the entities involved and initiate them to prepare themselves to assume their roles. In addition to lobbying for the fast issuance of the NOSCP decree, the Civil Society should understand the main roles assigned by the NOSCP to the key institutions in the NOSCP in order to hold these institutions accountable and promote transparency.

Under the NOSCP, the Ministry of Public Works and Transport – the Directorate General of Maritime and Land Transport (MOPWT-DGLMT) is assigned as the National Competent Authority (NCA) required by the Oil Pollution Response and Co-operation (OPRC) Convention. The key responsibilities of the NCA include:

- Responsibility, and therefore the accountability, for Oil Pollution Preparedness and response as required by OPRC Article 6 1) a) (i)
- Responsibility as custodian of the NOSCP
- Assessment of the requirement to activate the NOSCP
- Assigning the National Oil Spill Incident Commander (NOSIC) and acting as NOSIC if appropriate

As Plan Custodian, i.e. the owner of the NOSCP, the MOPWT-DGLMT will be responsible, and accountable, for:

- Production, maintenance and updating of the plan including taking into consideration any changes in the legal framework
- Co-ordination of a National Contingency Planning Committee to ensure ongoing improvement in national capability
- Ongoing training and exercise program
- Approval of facility/operation specific Oil Spill Contingency Plans
- Approval of local governorate Shoreline Response Plans (SRPs)
- Distribution of the plan

As for the Ministry of Environment (MOE), given its legal responsibility for protection of the environment in Lebanon, the Ministry must work closely with the MOPWT-DGLMT to ensure preparedness for oil spill and to manage a response to a tier 3 incident.

There are a number of other government ministries with oversight on spill-related issues, and all are represented within the Incident Command Structure (See Section3.4). These entities are also members of the National Oil Spill Planning Committee, which will be facilitated by the MOPWT-DGLMT as NCA. They can include, but are not limited to:

- Ministry of Public Works and Transport –Directorate Land and Maritime Transport (MOPWT-DGLMT)
- Ministry of Environment (MOE)
- Ministry of Energy and Water – Lebanese Petroleum Authority (LPA)
- Ministry of Energy and Water – Directorate General of Oil (DGO)
- Ministry of Energy and Water –Lebanese Oil Installations (LOI)
- Lebanese Armed Forces (LAF)
- Civil Defense
- Ministry of Agriculture (MOA)
- Ministry of Industry (MOI)
- Ministry of Interior and Municipalities (MOIM)
- MOIM General Security Force (MOIM GSF)
- Ministry of Information (MOIn)
- Ministry of Public Health (MOPH)
- Ministry of Labor (MOL)
- Ministry of Justice (MOJ)
- Ministry of Telecommunications (MOT)
- Ministry of Finance (MOF)
- Ministry of Culture (MOC)

This group will allow input from all ministries on all oil spill issues and allow collaboration for oil spill response training and exercise. The individual roles and responsibilities for each of these stakeholders are outlined in Volume C.

2.2.2 Local, Facility and Shoreline Plans

Lebanon adopted a tiered approach to structure national oil spill preparedness and response, which is in line with international best practice as per IPIECA-OGP Good Practice Guideline Tiered Preparedness and Response (2015). Tiers are no longer classified by the scale of the incident itself (size and location), but by the resources required to respond to the incident, including the response management requirements, which can be broadly considered as response personnel, response equipment, and additional support requirements. A response capability is categorized according to whether that capability is held locally (Tier 1), regionally (Tier 2) or nationally/ internationally (Tier 3).

In line with the tiered response concept, it is a requirement of the NOSCP, and a necessity, that all oil handling facilities, ports, and offshore installations develop an operation specific oil spill contingency plan. Facility level plans should be developed to cover small spills from specific operations in specific areas, i.e. Tier 1 spills. The appropriate equipment and resources should also be in place to combat these spills. In the event of a larger tier 2 spill, these facility plans must make provision for accessing additional resources through the ministry, other local industry specialist contractors, or the regional Governorate. Coastal Governorates must consider potential shoreline impact from marine spills, and their Regional Centers must make plans for clean-up of shoreline within their jurisdiction through the development of a Shoreline Response Plan (SRP). Such plans will use the local response capabilities and structures of the ministries' representatives and other government entities within the Governorate. If the oil impacts the shorelines surrounding a facility, but outside of its jurisdiction, the regional governorates will activate their local SRP for support. It is foreseen that Governorates will have access to national response equipment and to national response expertise, where appropriate. Consequently, Regional Plans should focus on the following elements:

- Provision of manpower for beach clean up
- Provision of facilities for waste management with relevant ministries
- Logistical support including – responder welfare, transport, PPE, etc.
- Response management facilities
- Simple oil spill training

All facility level plans and governorate plans must be approved before they can be considered for full implementation. Ports, terminals, and onshore facility plans must be sent to MOPWT-DGLMT for approval. Offshore exploration and production plans should be sent to the LPA for approval. In addition, plans should be sent to a number of statutory consultees. Ministries and Directorates that should be consulted are shown in NOSCP Volume A-Table 3.3. All plans must be reviewed every year and sent to the approving authority every three years.

For offshore exploration and production installations, and due to the large volumes which may potentially be released from an offshore well, operators should pay particularly attention to source control. This is the responsibility of the operator. During an offshore spill, source control will be run by the operator in parallel to national oil spill response activities.

The Civil Society can play a vital role, first in ensuring that the requirement for these Local/ Facility/ Shoreline plans as depicted in the NOSCP is included in the NOSCP decree. The Civil Society can then oversee if these Local/ Facility/ Shoreline plans are in place, and are fully operational, i.e. the relevant authorities are requiring these plans, ensuring that they align and integrate with other local area plans, regional governorate plans, and the NOSCP, that the appropriate equipment and resources considered in these plans are in place and ready for use, and that the plans are continuously tested and improved. The format of these plans is the responsibility of the facility or governorate. However, there are key elements, provided in Volume D of the NOSCP, which must be included.

2.2.3 Training and Exercises

Oil spill training is essential for preparedness and is required for all levels of response personnel, from equipment operators, shoreline supervisors, incident management team members, to incident commanders and senior staff with oil spill responsibilities. The NOSCP requires that the MOPWT-DGLMT, as NCA, establishes a national program for training and exercises in support of this plan. The International Maritime Organization has prepared a set of training courses to deliver training to each of these levels. This should be followed by the government and facilities alike, in identifying training requirements and planning a schedule of training to fulfill these requirements. An outline of the IMO training courses is given in NOSCP Volume D.

This will be supplemented by small local Tier 1 response exercises designed to teach equipment operation, management roles and responsibilities, as well as co-ordination with government agencies and local authorities. More complicated Tier 2 exercises will co-ordinate the sectoral response of several installations and local contractors with these external agencies. Every 2 years, a "full scope" Tier 3 exercise will be held to train and test the full NOSCP, and if necessary, international response involving the mobilization of the National Operations Room (NOR) and all relevant national departments and agencies. An outline of types of exercises which may be used, along with their recommended frequency is given in NOSCP Volume D.

Again, this is another key activity that the civil society can play a role in overseeing and ensuring that all parties involved are receiving the necessary training and participating in exercises to adequately implement their roles in a response. Representatives from the civil society may attend and oversee national exercises. Members of civil society may also participate in the training and exercises if they might be providing a support/ volunteering role in a response, as outlined in Section 3.4.1 below.

2.2.4 Financing

In order to build capability to respond to oil spills, relevant Ministries should allocate funds for associated activities (human resources, training, etc.) and assets (facilities, equipment, etc.) as part of their annual budgeting process.

3. RESPONSE

Oil spill incidents in the marine environment can originate from various sources including:

- Offshore installations
- Onshore oil storage facilities
- Oil tankers offloading operations
- Shipping incidents
- Spills within ports and harbors
- Spills from outside the Lebanese EEZ
- Spills from an unknown source

What happens as soon as a spill occurs, or is spotted in the marine environment? Receiving the initial notification of an oil spill incident and establishing a response in a timely and appropriate manner will be critical to the overall success of the oil spill response operations. The NOSCP defines the key steps in these first stages of response namely:

- Notification and Activation
- Initial Response
- Spill Assessment and Tier Allocation

Once these steps have been taken, then the appropriate level of response resources may be mobilized and the response established. Once a response is established, it can be maintained over weeks and months as necessary.

3.1 Notification and Activation

For ALL spills in Lebanon, the notification and activation procedure shown in Figure 1 should be followed. The procedure follows five steps and ensures that:

- A notification can be made 24 hours per day through the Joint Maritime Operations Chamber (JMOC), the main 24-hour contact channel for communications and notification of all oil spill incidents in Lebanese waters. The role of JMOC during spill activities will be in line with normal operations, i.e. they will communicate and co-ordinate marine traffic.

- The National Competent Authority (MOPWT-DGLMT), Ministry of Environment, and the Affected Ministry are notified by JMOC as soon as possible following a spill from any source.

- These key Ministries are able to assess an incident as soon as possible and mobilize resources in a timely manner. In the case of a tier 1 or 2 incident, this will be done through the Affected Ministry. In the case of a tier 3 incident and the activation of this plan, a National Oil Spill Incident Commander (NOSIC) is appointed as soon as possible, and the Incident Management Structure is established.

The agency that will assume the role of NOSIC depends on the nature of the spill and will be:

- MOPWT-DGLMT – For a spill at sea (shipping), a spill on land (loss of containment), a spill in a port, a spill where the source is unknown, and for a spill that originated from outside Lebanese territorial waters.

- LPA– For a spill that is created due to offshore O&G exploration activities.

Although a NOSIC will either be from the MOPWT-DGLMT or the LPA, there may also be another Affected Ministry. This will be the Ministry, Authority or Directorate with jurisdiction over the area of the spill. The affected ministry will participate in the Tier Assessment alongside the MOPWT-DGLMT and the MOE. In the event of a tier 1 or 2 spill, the Affected Ministry will support the Local Incident Commander (LIC). Table 1 lists the affected ministries and their area of responsibility.

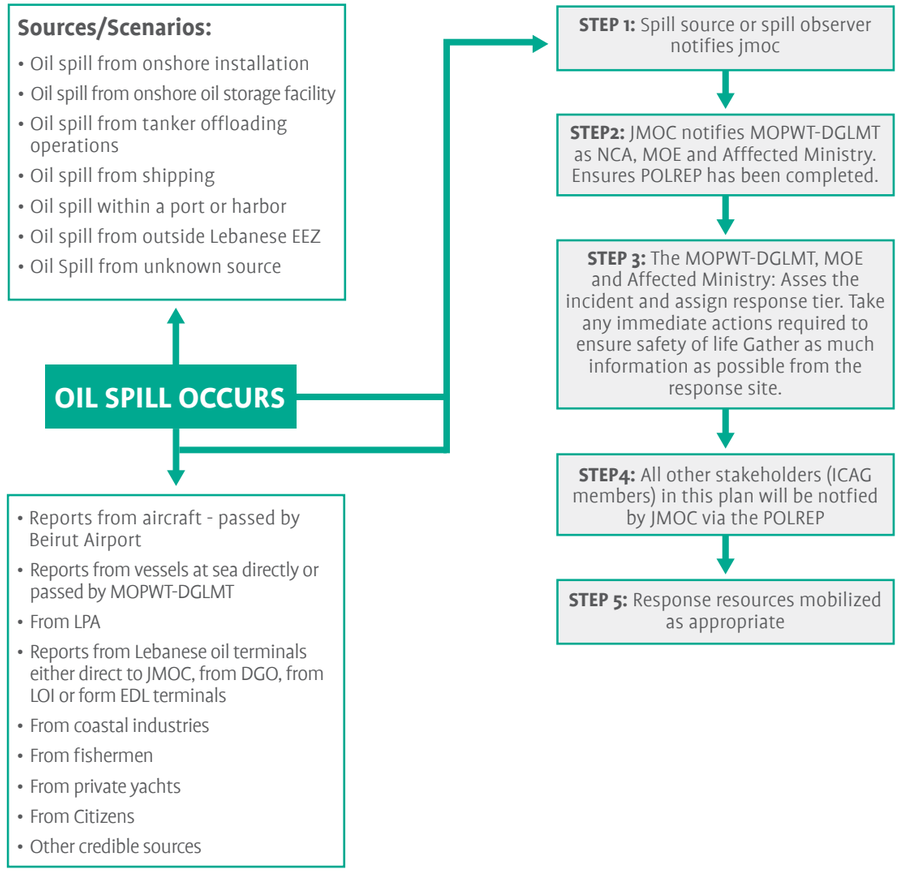


Figure 1. Oil spill notification procedure

Ministry	Area of Responsibility
Directorate General of Oil (DGO)	APIC Terminal spills
Lebanese Oil Installations (LOI)	Oil Installations at Zahrani and Tripoli
Electricite du Liban (EDL)	Power station terminals at Zouk, Zahrani, Deir Aamar, Hreesha, and Jiyeh
MOPWT-DGLMT	Unknown or cross boundary spills
Ministry of Industry (MOI)	Onshore coastal industries

Table 1. Affected Ministry

3.2 Initial Response

Initial actions are primarily taken by those at the spill site to:

- Ensure safety of life
- Identify the source of the spill
- Isolate the source of the spill
- Ascertain the responsible party
- Gather information to create as accurate a picture as possible and to enable Government Ministries and Agencies to support with the most appropriate level of response.

In addition, stakeholders who will form part of the incident response structure will receive the notification and begin to mobilize as necessary. As part of this initial response phase, a response tier level must be defined.

3.3 Spill Tier Allocation

Once notified the MOPWT-DGLMT, as NCA, together with the MOE and Affected Ministry will assess the incident to determine the likely tier of response and whether it is necessary to activate the NOSCP. These tiers, which will be used to define tiered response in Lebanon, are detailed in Table 2 below.

OSR Tier	Response Capability	Response Management
1	Port/facility/operators locally held resources used to mitigate spills that are typically operational in nature occurring on or near the facility or operation.	• Response can be managed within the capability of port authority, facility or offshore installation by the Local Incident Commander • Local/facility approved OSCPs to be activated. • MOPWT-DGLMT/LPA and Affected Ministry to oversee clean-up • Limited impact and geographical extent.
2	Resources held regionally/nationally that may increase response capability or to introduce more specialist technical capacity.	• Spill will continue to be managed by the Local Incident Commander at the facility with additional support from the Affected Ministry as appropriate. • Regional resources will provide additional support as necessary. Additional support may potentially come from mutual aid agreements between a group of industry operators, industry funded oil spill response cooperatives, specialized Tier 2 services or local commercial service providers. • Activation of Governorate Shoreline Protection and Clean-up Plans will be required in the case of oil pollution reaching shorelines outside the port or facility or offshore installation.
3	Resources available at a national level, including international resources which may be called upon in the event of Tier 1 and 2 resources being overwhelmed.	• NOSIC from the MOPWT or LPA will assume command as appropriate and once a Tier 3 incident is formally declared • The National Incident Management Structure will be mobilized. • The NOR will be notified directly by the NOSIC

Table 2. Definition of Oil Spill Tiers and Associated Response Management

3.4 Response to a Tier 3 Spill

The response organization required to deal with a Tier 3 incident in the NOSCP is based upon an internationally recognized Incident Command System (ICS) used widely by oil companies and some national governments. The ICS approach provides a structured and flexible response organization which can be matched appropriately to the scale of the incident.

The national incident management structure for a Tier 3 spill will be headed by the NOSIC who has overall operational tactical incident management authority. Key individuals nominated for the NOSIC role will be fully trained for the role in advance and have taken part in oil spill response exercises in the role of NOSIC. The NOSIC is supported by the NOSIC support staff comprising public affairs, security and safety, legal as well as technical specialists and commands four General Staff response groups namely Operations (headed by the Lebanese Armed Forces (LAF), Planning (headed by the MOE), Logistics (headed by the MOPWT) and Finance (headed by the Ministry of Finance (MOF). In addition, the NOSIC may receive strategic guidance, limitations and priorities from an Incident Command Advisory Group (ICAG) comprising high-level representatives from appropriate Government Ministries. This support is flexible and NOSIC may consult different members depending on the nature of the incident. Figure 2 below shows an outline of this response structure. For further details on oil spill roles for each of the responsible parties presented in Figure 2, refer to **NOSCP Volume C**. More specifically, **NOSCP Volume C- Table 3.1** summarizes the main responsibilities for each of the key stakeholders at the preparedness, response, and recovery levels as outlined by the Plan.

It is important for the Civil Society, in its role as a watchdog, to be aware that in the event of a major oil spill under Lebanese jurisdiction, the priorities for response are:

- The safety of the public and all responders
- Control of the source of the pollution, and prevention of any further pollution
- Containment of any pollution to the environment
- Mitigation of the effects of pollution on the environment and socio-economic assets

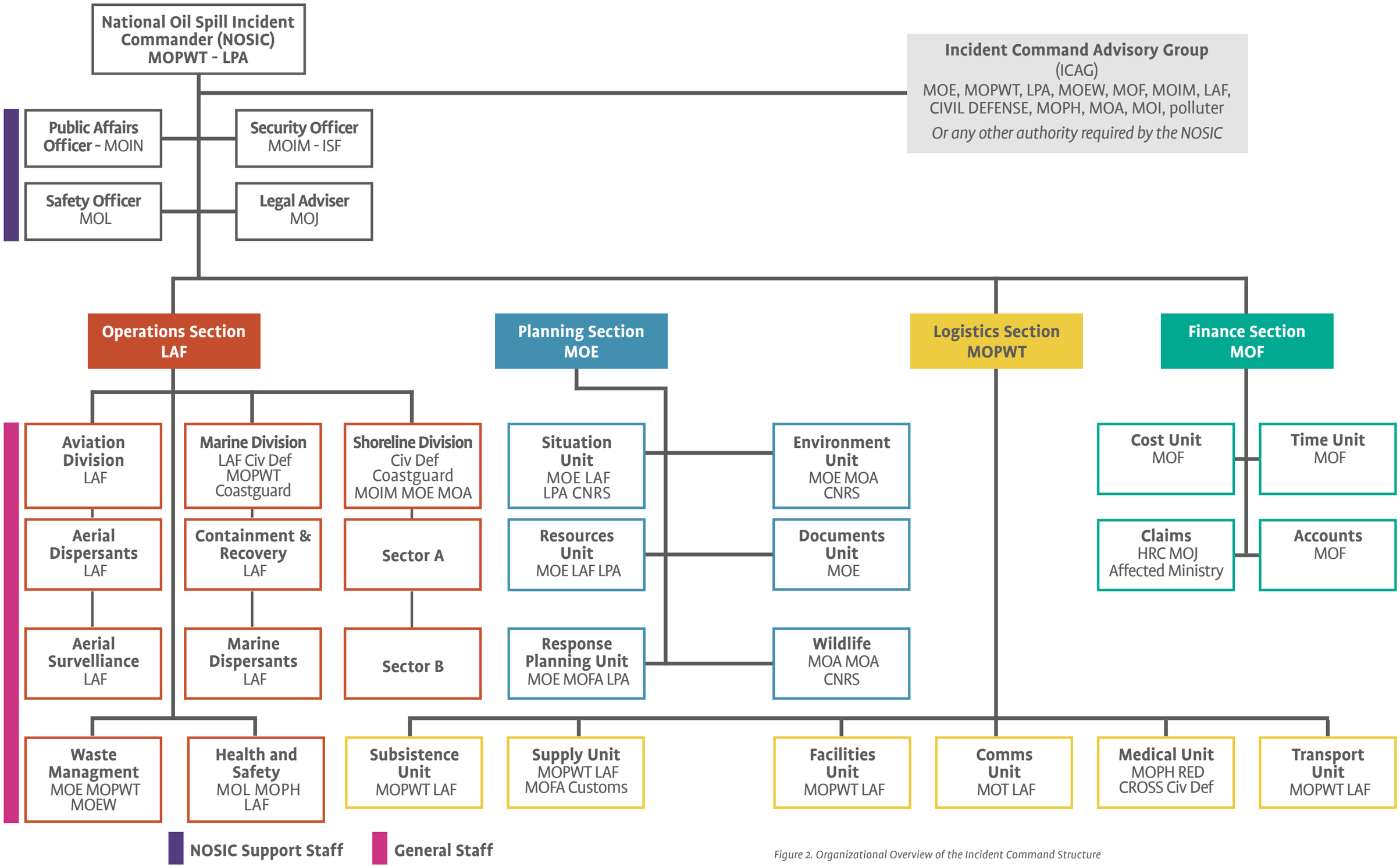


Figure 2. Organizational Overview of the Incident Command Structure

Although each oil spill is unique, an overall national oil spill response strategy was developed based on a qualitative risk assessment and a modelling exercise (Refer to NOSCP Volume B for details). The response strategies that will be used in Lebanon are given in Table 3. General guidelines for response identified for spills in Lebanese waters, as well as for spills which may originate outside of the Lebanese EEZ are detailed NOSCP Volume A Sections 5.2 to 5.4.

In support of the response, the MOE should work on establishing a national policy for the use of dispersants along with an approval system, as well as an oil spill waste management plan. These are actions that the Civil Society can follow up on.

National Response Strategy	Lebanese Context
Source control	Source control will be critical to minimizing the overall impact of a spill
Monitor and evaluate	Spill assessment requires accurate information about fate and effects of the oil. This information should be passed to the planning team to use to inform response strategy selection and response evaluation.
Use of dispersants	Oil spill modelling showed that in the event of a spill of crude oil from shipping or offshore drilling activities there is likely to be a sufficient time window to treat the oil with dispersant before the oil enters shallow waters. Use of dispersants is the only large-scale oil spill clean-up method for oil spills. If there are significant quantities of oil at sea, then dispersants will prevent, or reduce, shoreline impact. This will give a net environmental benefit. (See national policy on use of dispersants section 5.5, with further guidance in volume D).
Protection of sensitive areas	The most significant oil spill risk in Lebanon is from onshore oil storage facilities. In this scenario, shoreline impact and therefore environmental impact is likely to be significant. Protection of sensitive areas will be critical to minimizing overall impacts. Guidance on environmental and socio-economic resources and their prioritization is given in volume D, together with sensitivity maps.
Offshore Containment and Recovery	Lebanon imports significant quantities of heavy fuel oil (HFO). As dispersants are unlikely to be effective on HFO, the only response option in the event of a spill of this nature at sea will be the use of booms and skimmers for containment and recovery.
Shoreline clean up	Most of the scenarios modelled showed a possibility of shoreline impact, and therefore Lebanon should prepare for shoreline clean-up.

Table 3. Response Strategy

3.4.1 Participation of Volunteers

Given the fact that the response to an oil spill needs to be led and undertaken by governmental institutions, as identified and defined in the NOSCP, **the role of the civil society at this stage can be either to oversee how these authorities are handling the response, or to physically support as volunteers. There is a myriad of activities that volunteers can participate in during a response to a Tier 3 spill as listed in Box 2.** Volunteers are often categorized into two groups: (1) 'affiliated' individuals who come forward following an incident or disaster to assist with response activities during the response or recovery phase without pay or other consideration and have a pre-existing formal or informal arrangement with either a governmental agency or non-governmental organization (NGO) or Community Based Organization (CBO) and who have been trained for a specific role or function in incident response or disaster relief during the preparedness phase; and (2) 'unaffiliated' volunteers or individuals who come forward following an incident or disaster to assist a governmental agency, NGO, or CBO with response activities without pay or other compensatory consideration. Irrespective of the type of volunteers, their participation should be properly organized and managed to maximize their input and minimize risks to health and safety as well as liability issues.

Box 2: Potential Roles for Volunteers during an Oil Spill (NRT 2012)

Oiled Wildlife Rehabilitation

- Wildlife Rehabilitation
- Wildlife Reconnaissance
- Wildlife Recovery and Transport
- Wildlife Care and Processing - tasks include:
  - Animal washing/drying
  - Food preparation
  - Light construction (cage building
  - Facility cleaning
  - Laundry
  - In-take station processing for recovered wildlife (both alive and deceased)

Shoreline Cleanup Support

- Volunteer field observers and data recorders
- Pre-impact beach cleanup, including temporary movement of natural debris above the water line
- Local guides for beach access
- Displaced boom surveys
- Data entry

Public Relations and Community Liaison

- Guide visitors and media
- Identify lodging for responders
- VRC support
- Phone answering, dispatching, messaging
- Information center staffing
- Beach closure information point of contact (POC)

Boat Operations (boat owners who volunteer)

- Area safety (informing and directing other vessels away from contaminated areas while allowing work vessels in)
- Transporting assessment teams or cleanup crews
- Conducting on-water and near-shore field observations

Logistics

- Inventory Control
- Procurement
- Distribution of PPE
- Cleaning of PPE
- Construction of temporary structures
- Medical Unit assistant (appropriately qualified/ certified medical professional)
- Transportation
- Scheduling
- Dispatching
- Road building

Community Liaison Social Services

- Job placement (for unemployed)
- Public health information distribution
- Evacuation support
- Shelters
- Peer Counseling (similar to Critical Incident Stress Management (CISM)) (only professionally certified counselors)

Personnel Support Services

- Lodging attendants
- Message center
- Laundry service
- Food preparation and distribution (certain minimum food handling criteria may need to be met as required by state and local regulations)

Natural Resource Damage Assessment Support

- Field observers
- Rapid assessment for marine and estuarine habitats

Medical

- Dispatching
- First aid attendants

The participation of volunteers in responses to historical tier 3 oil spills around resulted in many important lessons learned and guidance as outlined below (NRT, 2012):

- The service of volunteers should be managed within the ICS structure that is formed for the response to the incidence, as significant logistics and coordination are required to manage large numbers of volunteers. A separate Volunteer Unit should be established in the Planning Section (refer to Figure 2) to maintain appropriate span of control over the volunteers, especially if they are unaffiliated to a particular NGO or CBO. The Volunteer Unit may be supported by a Volunteer Reception Center (VRC) to be the focal point for unaffiliated and/or affiliated volunteer recruitment, registration, orientation, and training. This could be set up by local governments or NGOs or CBOs if they are prepared to do so.

- Affiliated volunteers are the preferred method of volunteer manpower, and best efforts should be made to direct unaffiliated individuals towards affiliated organizations. When affiliated volunteers are used, they may be covered under the umbrella of the affiliated organization's liability coverage. Beyond insurance coverage, affiliated organizations provide supervision, training, and support of their members.

- Human health and safety is the first priority in decisions regarding how to use volunteers. The potential for injuries can be minimized by ensuring volunteers are properly trained and have appropriate personal protective equipment (PPE) and equipment for their assigned tasks. Volunteers should normally only be used in very low risk activities and only after receiving appropriate safety training. For example, assistance in the command post, logistics, staging areas and check-in require relatively little training and are minimal risk activities.

- Sometimes volunteers may be used for higher risk activities such as oiled wildlife cleaning. These activities require specialized training and, in some cases, licensing. It is preferable to use affiliated volunteer organizations that already have trained volunteers or established volunteer training programs for such activities. Volunteers with documented specialized training should be given higher priority for use.

- The NOSCP planning committee can identify areas that are likely to have significant volunteer interest. Community outreach to volunteer organizations in such areas should begin before an incident occurs. Identified organizations should be included in trainings and exercises at the local and national level.

Hence, in line of the above, it is recommended to identify organizations with interest in participating in oil spill response, to link them with the relevant governmental authority in charge of the volunteering activity of interest, to guide them on the required training and possibly licensing.

4. RECOVERY

Once the oil spill clean-up objectives set by all stakeholders are met, the response is terminated. This should be followed by an operational review to analyze response activities and identify strengths and weaknesses in the organization. A report by the incident management team will be prepared and submitted to the NCA and will make recommendations for improvements in procedures and modifications to the NOSCP. It may be appropriate to ask for external input to this report, for example the opinion of experts involved in the response or in some cases consultation with independent experts, who have had no input to the spill. **Experts from the civil society may be solicited and may have a role in reviewing such a report and providing input to it.**

Following response termination, post spill monitoring of areas affected by the oil spill will be required to determine the level of contamination of the shoreline or biological species. Monitoring will include an extensive campaign of sampling and analysis over a period of time to observe the recovery of an area following a spill. Monitoring programs should be agreed with the body paying compensation prior to the commencement of the work. These measures must be approved prior to commencement to ensure that they are 'reasonable' under the terms of the international compensation schemes for tanker spills and will enhance the natural recovery of an area. **Experts from the civil society can ensure if an adequate post-spill monitoring program is being implemented. Specialized NGOs can also participate in the actual execution of such a program.**

Finally, in line with claims management with international and national legislation, the polluter is ultimately responsible for financing the cleanup. Oil spill claims will be considered for:

- **Clean up and preventative measures:** Compensation will be paid for the cost of reasonable clean-up measures and other measures taken to prevent or minimize pollution damage.

- **Property damage:** Compensation is payable for reasonable costs of cleaning, repairing or replacing property that has been contaminated.

- **Economic loss:** Compensation is payable for loss of earnings suffered due to the oil spill, whether or not equipment is contaminated.

- **Environmental damage:** Compensation is payable for the costs of reasonable reinstatement measures aimed at accelerating natural recovery of environmental damage and also for approved scientific studies, for example to monitor the environmental recovery of the area.

A claim qualifies for compensation only to the extent that the amount of the loss of damage is demonstrated. All elements of proof are considered, but sufficient evidence must be provided. Each claim has its own characteristics, and it is therefore necessary to consider each claim based on its own merits. It is the responsibility of the Finance Section (Figure 2) to ensure that accurate records of costs incurred during the response are maintained, to provide the needed evidence for the claims. Yet, even with an adequate

claims management system in place, it may take months or years before all claims can be assessed and the finance assured. **Hence, this is another role of civil society to exert pressure on the relevant stakeholders to ensure timely and fair compensation.**

5. CONCLUSION

This guidebook presents a summary of the NOSCP, with emphasis on the areas of potential action for the civil society to drive the implementation of the NOSCP forward, at the prevention, preparedness, response, and recovery levels. The civil society can participate as volunteers in the response to Tier 3 spills. However, it is preferred that volunteers are affiliated to NGOs or CBOs, are well trained beforehand, and that their participation in the response is well managed under the incidence management structure to protect the health and safety of volunteers and prevent liability issues.

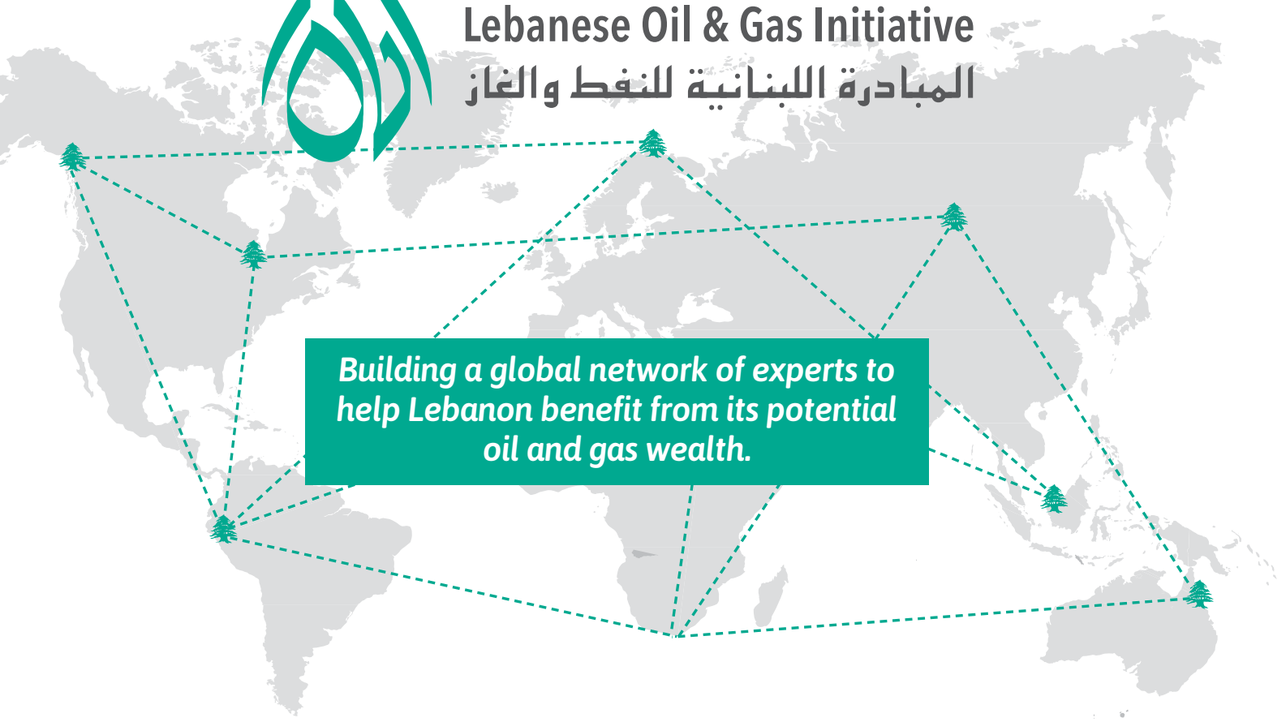
REFERENCES

National Response Team (NRT). 2012. Use of Volunteers Guidelines for Oil Spills. US NRT at the US EPA, Washington DC. Online. Available: https://nrt.org/sites/2/files/NRT_Use_of_Volunteers_Guidelines_for_Oil_Spills_FINAL_signatures_inserted_Version_28-Sept-2012.pdf

Lebanese Petroleum Administration (LPA). 2016. The National Oil Spill Contingency Plan for Lebanon. SODEL UNDP. Beirut, Lebanon.

Lebanese Oil & Gas Initiative

المبادرة اللبنانية للنفط والغاز



Building a global network of experts to help Lebanon benefit from its potential oil and gas wealth.

LEARN MORE ABOUT LOGI

www.logi-lebanon.org

FOLLOW US

LOGILebanon

LOGI_Lebanon

Lebanese Oil and Gas Initiative

Commissioned by:
Lebanese Oil and Gas Initiative (LOGI)

In cooperation with:
Friedrich Ebert Stiftung (FES)

Prepared and submitted by:
Rania A. Maroun