MEDITERRANEAN ACTION PLAN
First Meeting of the GEF Coordination Committee
Athens, Greece, 9 March 2001

REPORT

FIRST MEETING OF THE GEF COORDINATION COMMITTEE
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1. **Opening of the meeting, adoption of the agenda and organization of work**

1. Mr Lucien Chabason, Coordinator of the Mediterranean Action Plan, opened the First Meeting of the GEF Coordination Committee at 9.45 a.m. on 9 March 2001. At his proposal, the Meeting adopted the agenda as set out in document UNEP(DEC)/MED WG.181/1. The Meeting also decided that it would carry out its business in an informal manner, with the secretariat acting as moderator.

2. **Background and objectives of the project**

2. Introducing document UNEP(DEC)/MED WG.181/3/Rev.1, *Background and operational aspects of the implementation of the project “Determination of Priority Actions for the further Elaboration and Implementation of the Strategic Action Programme for the Mediterranean Sea (Annex III and IV)*, Mr Chabason emphasized that the Strategic Action Programme (SAP) was of great importance for the implementation of the Barcelona Convention, and in particular the Land-based Sources (LBS) Protocol. In this respect, he recalled the need, as reaffirmed by the Contracting Parties, for all countries which had not yet done so to ratify the LBS Protocol in order to provide a solid basis for the future work of MAP and for the implementation of the SAP, which had been adopted by the Eleventh Meeting of the Contracting Parties in Tunis in November 1997.

3. He recalled that, up to the present, MAP’s activities had been focused on monitoring activities and scientific issues, as well as common measures in certain areas. The GEF Project, which had commenced in January 2001, marked an important turning point in this respect. While MAP’s activities in the fields of monitoring and other areas would remain important, the GEF Project marked the launching of a practical operational phase of MAP activities to combat marine pollution in the Mediterranean Sea. The project would be undertaken in cooperation with and between countries, including those that were eligible to receive GEF funds and those which were not. The cooperation would also extend to other agencies, such as the World Bank, METAP, ICS/UNIDO, the French Global Environment Facility (FGEF) and the MAP Regional Activities Centres. Another partner was the European Union, both in its capacity as a Contracting Party and as an important actor and potential donor in the Euro-Mediterranean partnership.

4. Mr F.S. Civili, Senior Environmental Affairs Officer, briefly reviewed the significance of the SAP and the GEF Project in the context of the whole Barcelona system, as revised in 1995 and 1996 to align it with the principles endorsed at the Rio Summit in 1992. One of the commitments set out in the revised LBS Protocol was the formulation of a regional strategic action programme for the reduction and elimination of marine pollution from land-based sources as a cornerstone of MAP activities in this field. In view of the high cost of formulating the SAP, it had been necessary to seek additional funding from the UNEP/GEF Coordination Unit. With the aid of an initial small grant from the GEF Project Development Facility (PDF), the SAP had been formulated on the basis of a transboundary diagnostic analysis and a report on pollution hot spots. He emphasized that the long-term implementation of the SAP would require a solid technical, scientific and institutional basis for its application at the national level. It was precisely with a view to developing this technical, scientific and institutional basis at the regional and national levels that the present GEF Project had been planned. He added that, in addition to the SAP for the reduction and elimination of marine pollution from land-based sources, the GEF Project also included as one of its components the preparation of another SAP for biodiversity. The total cost of the GEF Project was some $12 million, of which one half would be provided by GEF, $1.6 million by FGEF, $3 million in counterpart contributions in kind from the countries,$900,000 by the Mediterranean Trust Fund, as well as funding from other sources, including METAP.
5. In conclusion, while the overall objective of the GEF Project was the reduction and elimination of marine pollution from land-based sources, a number of specific objectives had been set for the project, which were all intended to lead up to the formulation of National Action Plans (NAPs) setting out a concrete basis for the protection of the marine environment from land-based activities.

3. Implementation of the project

3.1 Pollution hot spots and sensitive areas

6. Mr G. Kamizoulis, WHO-EURO Scientist, recalled that work had been carried out by MAP in 1996-1997 on the identification of pollution hot spots at the national level. However, further action was now required to revise, if needed, the list of national pollution hot spots to take into account new data. This would lead up to the development of a revised list of pollution hot spots, from which a number of hot spots would be selected by the Ad Hoc Technical Committee for priority action. A meeting of experts would be held in April 2001 to develop the criteria, related to transboundary effects, to be used in the selection process. The target of these activities was to complete the preliminary phase of the selection process so that a meeting could be held in September 2001 to select the list of hot spots to be covered by pre-investment studies. In this respect, it would be important to hold consultations with the countries concerned, particularly with regard to the sustainability of the proposed activities, or in other words, the commitment of the countries to reduce pollution. The pre-investment studies themselves would be carried out by the countries concerned, with the assistance provided on the basis of Memoranda of Understanding (MOUs). Under the proposed schedule, all of the pre-investment studies would be completed by the end of 2003. He added that the proposed action on sensitive areas was not as urgent as the action on pollution hot spots. A meeting would therefore be held later on the subject of sensitive areas.

7. The representative of METAP reviewed the technical assistance provided by METAP for the protection of the Mediterranean environment. The third phase of METAP had given rise to many products, including a series of projects and programmes, many of which were in the field of capacity building. METAP would be participating in the financing of the GEF Project, especially through the provision of assistance in kind. Its main task would be assisting the beneficiaries of the GEF Project in the development of pre-investment studies, which it regarded as projects to develop investment programmes that would contribute directly to the reduction of pollution in the Mediterranean. He emphasized that, to ensure their success, projects of practical action to reduce pollution needed to be clearly achievable, which would make it easier to attract investment financing. For this purpose, METAP proposed to include socio-economic criteria in the project selection process. METAP would be at the disposal of countries at their request to help them prepare such studies, particularly with a view to ascertaining the quality of projects in terms of their social and economic feasibility. The representative of METAP concluded that the planned pre-investment studies should cover all technical, socio-economic, financial, institutional and environmental aspects as required by donors and funding agencies for appraisal of investment projects.

8. The representative of ICS-UNIDO confirmed the cooperation of ICS-UNIDO in the GEF Project, mainly in the field of financing and environmental expertise. The activities undertaken by ICS-UNIDO in this context would involve close cooperation with METAP in financing and supporting studies of the action to be taken in pollution hot spots.

9. Several speakers emphasized the great importance of the GEF Project, as well as the need to revise the list of pollution hot spots on the basis of updated information. Such a revision should be undertaken before any feasibility studies were carried out. It was also
emphasized that the criteria for the selection of hot spots for pre-investment studies should
be developed in close cooperation with the countries involved.

10. In reply, the Coordinator re-affirmed that the GEF Project was intended to produce
projects that would lead to investments, and not just technical studies. In that respect, the
countries would be the prime movers in the revision of the list of pollution hot spots and in
proposing hot spots for further funding, based on agreed criteria.

11. In response to a question from the representative of Albania, the Coordinator
indicated that terms of reference would be developed for GEF Project national coordinators
to help them fulfil their functions as effectively as possible.

3.2 Regional cooperative actions

12. Mr Civili explained that the regional cooperative actions component of the GEF
Project was intended to develop the legal, technical and administrative basis at the regional
level as a platform for the investments to be made in future on the basis of National Action
Plans. As such, it was a component that would benefit the whole region, including countries
that were not eligible for funding under the GEF Project. The activities to be carried out
included the preparation of sets of regional guidelines and plans on a range of important
subjects, some of which, such as river pollution, were new in the MAP context and
corresponded to the broadened scope of the revised LBS Protocol. The main responsibility
for these activities would lie with MED POL and WHO-EURO. An important part of the
activities under this component of the SAP concerned the development of regional guidelines
and plans on clean production technologies. The RAC/CP in Barcelona would play an
important role in this work. The Secretariat was currently preparing an operational document
on the methods, approaches and principles for the implementation of the commitments set
out in the SAP, which would be examined at a meeting to be held in Catania at the end of

13. Several speakers referred to the target levels and dates mentioned for the reduction
of BOD inputs and hazardous wastes from industrial installations. While these targets and
dates were contained in the SAP, they would be included in a revision process to be
discussed at the meeting in Catania.

14. The representative of the FFEM said that it was very important for emphasis to be
placed at the regional level on the financial aspects of the action to be taken. It was
essential that all the plans emanating from the GEF Project ensured their sustainability
through the inclusion of economic instruments to raise the necessary financing. The
guidelines and plans produced at the regional level should therefore include financial aspects
alongside scientific and technical questions.

3.3 Capacity building

15. Introducing the capacity-building component of the GEF Project, Mr Civili explained
that, in addition to the regional courses planned, the activities would mainly have a national
dimension, particularly through the emphasis placed on the training of national trainers, who
would then carry out further training in their own countries. This was a very important
component of the SAP, which was designed to improve the capacity of national institutions to
address the objectives and activities set out in the SAP. The main body of training activities
would commence in 2002.

16. In response to a question concerning the selection of countries for the holding of
training activities, Mr Kamizoulis explained that while the planned training activities would be
for a fixed number of countries, eligible for GEF funding, resources could be found to cover training for other countries. Moreover, the training materials were being developed so that they could be easily translated into national languages and could be disseminated to all the countries in the region.

17. The representative of METAP reviewed his organization’s contribution to the planned capacity-building activities, and emphasized that all support would be provided in accordance with METAP’s new approach of full consultation and collaboration with recipient countries. METAP had already undertaken a good deal of preparatory work, including visiting the countries concerned with a view to the identification of their immediate, medium-term and long-term needs. In these activities, emphasis would be placed on the development of national legal, institutional and operation capacities, with particular reference to the capacity required to develop the appropriate legal framework at the national level for the application of the relevant international standards. Considerable importance was also attached to the broader participation of civil society in the respective activities and to creating the conditions for the development of practical and sustainable products.

18. The representative of FFEM explained that the first stage of his organization’s involvement in the GEF Project, that is the conceptional stage, namely the development of the SAP, had already been completed. However, the second stage, which involved the preparation of project documents and the examination of the content of projects submitted for financing, was only now commencing. As a result, FFEM’s contribution to the implementation of the SAP had not yet been defined in detail. He therefore called upon the GEF Project national coordinators in each country to indicate the capacity-building activities that could be envisaged in the context of the SAP.

19. The representative of ICS-UNIDO offered the support of his organization in the organization of some training courses at the national level, in the framework of the GEF Project.

3.4 Financial Sustainability of SAP MED

20. Mr I. Trumbic, Director, Priority Actions Programme/Regional Activity Centre (PAP/RAC), emphasized that the term “sustainability” was used in this context in the sense of ensuring the long-term continuation of the action undertaken at the national level after the completion of the GEF Project. It was very important to identify and develop financial instruments that would be capable of financing project activities over a 25-year period. The activities undertaken under this component of the GEF Project would therefore be focused on the identification of the most eligible financial instruments, their testing at the national level and the proposal of economic instruments to countries for their inclusion in planned activities and in national legislation. A questionnaire was being developed and would be sent out to all countries on the economic instruments that were already in use. Pilot activities would also be carried out to test specific instruments and help countries select those that were best adapted to their needs. An expert meeting would be held to assess the state of the art with regard to the use of economic instruments in the region. Although the start of the work on this component had been somewhat delayed, it was expected that it would be completed by the end of 2003.

21. In response to a comment by the representative of Greece that all Mediterranean countries needed to do much work in the identification and application of economic instruments to finance measures for the reduction of pollution, Mr Civili emphasized that it was necessary to draw on the experience acquired throughout the world in this area. For this purpose, collaboration would be developed with other international bodies, such as the GPA Coordination Office in The Hague.
3.5 Public Participation

22. Mr A. Demetropoulos, acting GEF Project Manager, indicated that the objective of this component of the project was to involve the public, particularly in the form of NGOs, more fully in the planning and implementation of action at the national level. Such public participation was vital to the development of the consensus, which was a prerequisite for the success of any such action. It would be necessary to identify the methods currently used at the national level to promote public information and participation. In particular, effective public participation would involve the inclusion of NGOs in the national committees that were to be set up to prepare the National Action Plans. It was envisaged that a programme and guidelines for such participation would be developed at the regional level for implementation at the national level.

23. After several speakers had emphasized the importance of applying modern principles with regard to public information and participation, as set out for example in the Aarhus Convention, the Coordinator pointed out that both the Barcelona Convention and the LBS Protocol contained advanced principles on this matter. However, he warned that NGOs tended to be more active in the field of biodiversity than in marine pollution, which was an area with much less media coverage. The SAP provided an opportunity to improve public participation and information in this important area, and the relevant provisions should be included in the MOUs concluded with countries.

24. The representative of METAP called for further reflection on how public participation could be improved throughout the activities undertaken for the implementation of the SAP, and particularly in the preparation and implementation of National Action Plans, in which the public should be viewed as a vital actor, and not merely a beneficiary. Public participation was vital to the success and sustainability of all environmental action. It was perhaps a weakness of the GEF Project that no NGOs were present in the GEF Coordination Committee.

3.6 National Action Plans

25. The Coordinator stated that, alongside the identification of pollution hot spots and capacity-building activities, the development of National Action Plans was one of the cornerstones of the GEF Project with a view to the implementation in practice of the LBS Protocol and the SAP.

26. Mr Civili reaffirmed that the final success of the GEF Project would be measured in terms of the formulation and implementation of National Action Plans, which would set out the manner in which countries would give effect to their commitments under the LBS Protocol and the SAP. There was a great need for capacity-building activities to support the formulation of National Action Plans in view of the new types of commitments and activities that they would contain. The two first steps to be taken at the national level in this respect were the creation of inter-ministerial committees and the appointment of national coordinators for the GEF Project. In view of the multidisciplinary nature of the SAP and the GEF Project, their long-term implementation would be severely prejudiced by any failure to create a proper inter-ministerial committee with adequate political power.

27. He reviewed the proposed process for the formulation of National Action Plans, as described in the Annex to document UNEP(DEC)/MED WG.181/3/Rev.1, with particular reference to the preparation of national diagnostic analyses and sectoral programmes. MOUs would be signed with each country on the specific activities to be undertaken for the
formulation of National Action Plans. He emphasized that the implementation of the National Action Plans would constitute proof of the success of the GEF Project and that they would need to include provisions to safeguard their financial sustainability.

28. The representative of the European Union, speaking as the representative of a Contracting Party and a possible donor, emphasized the importance of an integrated approach in the establishment of National Action Plans, which were vital components in the adoption of comprehensive action for the implementation of the SAP. Such action was of great importance in view of the development of the EURO-Mediterranean partnership and the proposed establishment of a free trade area in the Mediterranean. He also reaffirmed the importance of the participation of NGOs and civil society, including local actors, such as chambers of commerce, in the implementation of these types of projects. In this respect, the action of the MCSD and its links to national commissions on sustainable development were important.

29. In response to several speakers who emphasized the need for wide-ranging consultations at the national level for the formulation and implementation of National Action Plans, the Coordinator added that the proposed activities could not be undertaken without close cooperation with all the administrative areas concerned at the national level. The implementation of the SAP through the National Action Plans provided the staff of Ministries of the Environment with an opportunity to act as catalysts for common action, backed by the prestige of the GEF.

30. Mr Civili agreed with a number of speakers that the process of developing National Action Plans should take into account and should be coordinated with the action taken in other areas, including the formulation of national environmental action plans (NEAPs), with a view to using all the experience which had already been acquired and avoiding any duplication. He added that, based on the SAP adopted by the Contracting Parties in Tunis, the process for the implementation of the GEF Project, and particularly for the development of National Action Plans, would be reviewed in greater detail at the meeting in Catania, which would cover such issues as the baselines to be used and target dates. The SAP constituted the overall framework, within which a schedule of specific action to be undertaken each biennium would be submitted to each meeting of the Contracting Parties.

3.7 Institutional aspects of implementing the project and actions needed at the national level

31. Mr Demetropoulos briefly reviewed the composition and functions of the GEF Project Inter-Agency Steering Committee, the Coordination Committee and the Ad Hoc Technical Committee, as provided for in the project document. The Inter-Agency Committee is foreseen to cover all aspects of the GEF project. The Coordination Committee (of National Coordinators) and the Ad hoc committee are intended to cover the SAP MED aspects of the project. He explained that terms of reference would be developed for the National Coordinators for the GEF Project and for the Inter-Ministerial Committees. He added that a parallel set of institutions was envisaged for the preparation of the SAP for biodiversity, with a committee of National Correspondents and an Advisory Committee, mainly made up of representatives of international and regional bodies and programmes and NGOs, with expertise in marine and coastal biodiversity. He mentioned that, to-date, not all the countries had nominated National Coordinators and National Correspondents.

4. Development of a SAP for Biodiversity

32. While noting that the SAP for biodiversity (SAP BIO) did not lie within the terms of reference of the GEF Coordination Committee, Mr G. Trochia, Specially Protected Areas
Regional Activity Centre (SPA/RAC), reviewed the objectives of the proposed SAP BIO, the institutional arrangements and the planned activities. The main objective of these activities was to develop a strategic action plan for the conservation of marine and coastal biodiversity as a basis for the implementation of the Protocol concerning Specially Protected Areas and Biological Diversity. He noted that the institutional structure for the SAP BIO was separate from that of the rest of the GEF Project, and included the appointment of national correspondents.

33. The Coordinator added that, in contrast with the rest of the GEF Project concerning marine pollution, for which a SAP had already been prepared and approved by the Contracting Parties, it was still necessary to go through the whole process of the formulation and approval of the SAP BIO. Another difference was the profusion of the existing instruments on biodiversity covering various regions and groups of countries, including the European Union Directive on habitats. There therefore existed a problem of coordination with the existing commitments of countries under these instruments. He believed that the added value of the SAP BIO would be the fact that it went beyond existing inventories and recommendations to develop a strategic framework of practical action for the achievement of biodiversity objectives in the Mediterranean. The SAP BIO also provided an important opportunity to raise the priority given to marine and coastal biodiversity, which often ranked behind land-based biodiversity in terms of its public profile.

34. Some representatives referred to the MEDWET coastal projects financed by GEF and FFEM covering a total of 10 countries. These were integrated projects combining scientific, legal and institutional components. One of the weaknesses of these projects was the lack of a formal cooperative framework. Other countries had expressed the wish to join the projects. The SAP BIO could perhaps provide a framework for such an expansion. He welcomed the fact that MAP would be represented at the coordination meeting for the projects to be held in Morocco in April.

35. The representative of Monaco noted the special status of the SAP BIO within the GEF Project. He recalled the need, within the field of biodiversity, to bring all the various actors together, including the NGOs and Convention Secretariats active in this field, through a structure such as the MCSD, with a view to promoting coherence of action in the area of Mediterranean biodiversity at all levels, including the institutional, intergovernmental and intragovernmental levels.

5. Concluding remarks

36. Mr Civili welcomed the useful and positive discussion. He recognized the need to provide those concerned with more details of the proposed process in several areas, including the role of national coordinators, the manner in which financing would be provided through the Secretariat and the content of MOUs. The Secretariat would be providing further information by mail in the near future on these subjects and on the appointment of the GEF Project manager. Issues which required further elaboration included the form to be taken by MOUs, which could either cover all the relevant action at the national level, including the interministerial committee, the national coordinators, pre-investment studies and National Action Plans, or could be drawn up separately to cover specific components of project activities. In conclusion, he once again emphasized the importance of establishing powerful interministerial committees.

37. Mr Pernetta, UNEP/GEF Coordination Office, reviewed the process that had led up to the launching of the GEF Project in January 2001. He emphasized that the time which had been taken in the development of the Project reflected both its complexity and the new approaches and thinking required at the regional, national and even individual levels. The
objective of the GEF Project was to lead to action, which would reflect the long-term commitment of the countries in the region to the SAP and the LBS Protocol. However, it was important to recall in this respect that, while GEF financing had made the project possible, it had been estimated that an overall sum of a round $6 billion was required to address marine pollution from land-based sources in the Mediterranean. Although GEF could provide financing to help countries examine the problems and the options for resolving them, it would not be in a position to fund the investment arising out of the project. The sustainability of the activities developed under the terms of the SAP would therefore depend on the willingness of the countries concerned to provide or borrow resources, and on the willingness of donors, such as the World Bank, to make loans. Sustainability therefore required the involvement of a number of actors at an early stage on the basis of a pre-investment portfolio. This did not mean that further GEF funding would not be available for subsequent development activities in such fields as demonstration projects to test the use of economic instruments. The role of GEF was to help remove barriers to action.

38. He also urged those involved in the project to look further afield with a view to drawing on experience acquired elsewhere. In this context, he referred to a number of innovative projects undertaken with the assistance of GEF, including the Sao Francisco project in Brazil, which combined the management of river and coastal areas; the San Juan project in Costa Rica and Nicaragua, which addressed the same issue with the added complication of an intervening border along the river bed; the East Asian Seas project, which was demonstrating the involvement of the private sector and civil society in environmental action; and the Russian Arctic project, which involved the development of a National Action Plan to implement the GPA/LBA in the Russian Arctic.

39. Several speakers welcomed the information provided by the previous speaker on projects in other regions and called for the dissemination of more information on innovative projects as a means of assisting Mediterranean countries in their efforts to give effect to the SAP.

6. Other business

40. The Meeting accepted the proposal by the representative of Albania to hold the next Meeting of the GEF Coordination Committee in Albania.

7. Closure of the Meeting

41. The Coordinator closed the Meeting at 5.15 p.m. on 9 March 2001.
ANNEX I

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ANNEX II

AGENDA

1. Opening of the Meeting
2. Adoption of the Agenda and Organisation of Work
3. Election of Officers
4. Briefing and discussion on the GEF Project - progress in project planning and implementation
5. Actions needed at the national level for the implementation of the project
6. Other business
7. Closure of the meeting
ANNEX III

Background and operational aspects of the implementation of the project “Determination of Priority Actions for the further Elaboration and Implementation of the Strategic Action Programme for the Mediterranean Sea”
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   b. The preparation of sectoral programmes 21
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BACKGROUND

1. Background to the project

In the present document, for practical reasons, the project “Determination of priority actions for the further elaboration and implementation of the Strategic Action Programme for the Mediterranean Sea” is referred to as the “GEF Project”. Though the funding for this project largely comes from the Global Environment Facility Trust Fund there are in fact significant contributions from FFEM, METAP and the MED Trust Fund and smaller contributions from other parties as well as significant Counterpart contributions from the countries.

The GEF Operational Strategy lists the “degradation of the quality of transboundary water resources, caused mainly by pollution from land-based activities; physical habitat degradation of coastal and near-shore marine areas, lakes, and watercourses as a result of inappropriate management; introduction of non-indigenous species; and excessive exploitation of living and nonliving resources” as the four major global environment concerns relating to international waters that will be addressed by the GEF. The present project addresses directly two of these concerns and in the process seeks to address biodiversity issues relating to sensitive areas thus conforming to the Operational Strategy which recognizes that “GEF projects integrating several focal areas have the potential to multiply global benefits from GEF interventions”.

As a result of international efforts to protect the Mediterranean Sea, twenty Mediterranean countries and the European Union are Contracting Parties to the Barcelona Convention and to the Protocol for the Protection of the Mediterranean Sea against Pollution from Land-based Sources (LBS Protocol) and to the Mediterranean Action Plan (MAP). UNEP, through the Co-ordinating Unit for the MAP has served as the Secretariat to the Action Plan and the Convention since their adoption.

The revisions of the Barcelona Convention, its related protocols (1995) and the associated Action Plan directed the whole system towards development and implementation of strategic actions designed to address inter alia problems of pollution resulting from land-based activities in the framework of overall plans for the sustainable development of the Mediterranean Sea and its coastal region. Past experience together with the findings of the draft Transboundary Diagnostic Analysis prepared with a GEF Project Development Facility Grant suggests that a major constraint to the protection of the marine and coastal environment results from inappropriate management of the coastal zone. The root causes of this problem result from a lack of adequate coastal zone planning and management; inadequate national legislation and its effective enforcement; weak institutional structures at national and regional levels; inadequate human resources allocated for these types of activities; and lack of mobilization of adequate financial resources to address the identified issues and problems.

The GEF project aims at the implementation of a number of key components of the Strategic Action Plan to address Pollution from Land-based Activities, for the Mediterranean (SAP MED), which has been adopted by all Contracting Parties of the Barcelona Convention, at the 10th Meeting of the Contracting Parties (Tunis, November 1997). The objectives of this action plan are to facilitate the protection of the Mediterranean Sea from pollution from land based activities, through a multitude of activities, both at the regional and the national level. The GEF project also aims at the preparation and adoption of a Strategic Action Plan for Biodiversity (SAP BIO) for the Mediterranean, to serve the needs of the Specially Protected Areas and Biodiversity Protocol. The implementation of the project started in January 2001.
2. Funding

The total cost of the project is estimated at $12,229,000. These funds come from GEF, FFEM and a variety of sources that are given in the table below. Some are contributions In-Kind and some are Counterpart Contributions. They are allocated to the main/umbrella project (MEDU) and to four sub-projects (WHO/EURO, PAP/RAC, RAC/CP and SPA/RAC).

<table>
<thead>
<tr>
<th>Source</th>
<th>Umbrella Project</th>
<th>WHO/EURO</th>
<th>PAP/RAC</th>
<th>RAC/CP</th>
<th>SPA/RAC</th>
<th>TOTAL</th>
</tr>
</thead>
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<tr>
<td>GEF Trust Fund</td>
<td>4,649,000</td>
<td>295,000</td>
<td>370,000</td>
<td>55,000</td>
<td>700,000</td>
<td>6,069,000</td>
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<td>MED Trust Fund</td>
<td>570,000</td>
<td>120,000</td>
<td>60,000</td>
<td>45,000</td>
<td>40,000</td>
<td>835,000</td>
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<tr>
<td>Counterpart Contr.</td>
<td>3,000,000</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>FFEM</td>
<td>1,150,000</td>
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<td>150,000</td>
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<td>1,600,000</td>
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<tr>
<td>METAP</td>
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<td>WHO/EURO</td>
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<td></td>
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<td>PAP/RAC</td>
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<td>RAC/CP</td>
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</tr>
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<td>SPA/RAC</td>
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<td>In-Kind Contributions</td>
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<td></td>
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<td>Incl. UNEP</td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>TOTAL</td>
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<td>790,000</td>
<td>590,000</td>
<td>290,000</td>
<td>740,000</td>
<td>12,229,000</td>
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<td>Percentage</td>
<td>80.29</td>
<td>6.46</td>
<td>4.82</td>
<td>2.37</td>
<td>6.05</td>
<td>100</td>
</tr>
</tbody>
</table>

3. Project Objectives

1. The overall goal of the project is to improve the quality of the marine environment in the Mediterranean Region by better shared-management of land-based pollution through improved international cooperation in the management of land-based pollution of transboundary and regional significance. The objectives of the SAP MED are to facilitate the implementation of the LBS Protocol to the Barcelona Convention by the Contracting Parties and to contribute to the maintenance and where appropriate, restoration of the productive capacity and biodiversity of the marine environment, ensuring the protection of human health, as well as promoting the conservation and sustainable use of marine living resources.

2. The agreed immediate objectives of the SAP MED are: to protect the marine environment and coastal zones through prevention of pollution and by reduction and, as far as possible, elimination of pollutant inputs, whether chronic or accidental; and to develop and implement national programmes of action for the protection of the marine environment from land based sources.

The specific objectives of this project are to implement the following components of the SAP MED to address pollution from land-based sources, to:

C complete an analysis of the transboundary importance of the 103 hot spots identified in the TDA MED and SAP MED and finalize the priority list for intervention and investments ("Investment portfolio") (pre-investment studies will be conducted only in GEF eligible countries);
C to formulate and adopt principles, approaches, measures, timetables and priorities for action, that address each major land-based source of pollution and assist countries in the implementation of such actions;

C conduct pre-investment analysis of expected baseline and additional actions needed to address the selected hot spots, and secure recipient country agreement to baseline investments;

C prepare and adopt at the regional level, detailed, operational guidelines for the formulation of National Action Plans (NAPs) for the protection of the marine environment from land-based activities;

C assist countries to prepare, adopt at the highest level, and implement, country specific National Action Plans based on the regionally prepared and adopted guidelines;

C identify roles for, and ensure effective participation of non-governmental organizations in the implementation of components of the SAP MED, and where appropriate incorporate these into the National Action Plans; and to address other transboundary issues as follows:

C finalize and adopt a comprehensive and holistic Transboundary Diagnostic Analysis; and

In addition to the SAP MED related objectives the following biodiversity related objective is included in the project:

C develop and adopt a strategic action plan for biodiversity in the Mediterranean in conformity with the provisions of the protocol on Specially Protected Areas and Biodiversity.

3. The SAP MED is addressed to, and has been endorsed by, all Contracting Parties. It proposes common objectives for all countries, however, it is evident that the implementation of the proposed activities should take into account the state of the environment of each country. The timing for activities and for achievement of targets may also differ between recipient countries, taking into account their present capacity to adapt and reconvert existing installations, the economic conditions and the development needs of individual countries.

4. GEF non-recipient countries that are party to the Convention and which have endorsed the Strategic Action Plan will be encouraged to participate in regional activities and to address regionally identified priorities through appropriate national action. Participation in regional activities of representatives and experts from these countries will be supported by the trust funds available to the Mediterranean Action Plan. Approved national actions that are consistent with and in support of the implementation of the SAP MED will be, subsequently listed as associated financing to this project.

4. Implementation of the project

1. Pollution hot spots and sensitive areas

The specific needs and aims in pollution reduction in the Mediterranean region, based on a revised Transboundary Diagnostic Analysis to be approved by governments, are:

(a) To reduce inputs in the Mediterranean Sea, particularly in areas where high levels of pollution loads (originating from domestic or industrial sources) are being discharged.

(b) To reduce pollution, particularly in estuaries and coastal waters of natural or socio-economic value, which can be considered sensitive as they face a
higher risk of sustaining negative impacts. The idea is to promote preventive measures to reduce pollution in these areas, so that there will be no need for remedial actions that usually require high investments.

(c) To prioritize identified pollution hot spots at the national level in the Mediterranean on the basis of existing and new data and to select areas for immediate intervention and preparation of pre-investment studies. Though the funds available in the region are not sufficient to tackle all pollution hot spots simultaneously, the selection procedure will ensure that the most important will be covered first.

(d) To prepare pre-investment studies for the identified pollution hot spots, so as to provide the necessary link between activities for pollution reduction and related investments.

The component concerning the identification of priority pollution hot spots and sensitive areas was developed not only by GEF-eligible countries but by all Mediterranean countries, utilizing funds provided by the Mediterranean Action Plan, in order to have a global situation in the Mediterranean. All countries agreed that a priority list of pollution hot spots and sensitive areas should be prepared for each country. Such a list was prepared for every country (see MAP Technical Reports Series No. 119) also including an indication on the costs for rehabilitation activities, but did not take fully into account transboundary effects. It is, therefore, apparent that countries require very well defined criteria in order to formulate their statements and define the information needed. Therefore, the first step to be taken will be the preparation of criteria for transboundary prioritization to be endorsed by the countries prior to the preparation of an updated list of priority pollution hot spots and sensitive areas.

The prioritization of the transboundary pollution hot spots will also take into account the cost of the measures required to abate pollution. Prioritization will also facilitate selection of the pollution hot spots for which investment will be needed to implement measures for pollution reduction. Adequate measures, as well as a plan of identification of sources of pollution and their respective control, will be included in pre-investment studies which will be prepared to assist countries in decision making and donors in making their financial contribution.

To support the above, a draft report has been prepared by consultants, based on the existing ranking system and the parameters used to describe the effects on the environment and the human health. The document proposes a revised ranking system to show the severity of each of the transboundary effects on the identified hot spots and sensitive areas according to criteria to be proposed.

METAP will elaborate a set of socio-economic criteria based on the severity of the hot spots with respect to parameters on effects on economic activity and amenity values to be used for the selection of national pollution hot spots for pre-investment studies.

Following the preparation of the draft document on criteria determination for pollution hot spots, an experts consultation meeting will be convened in order to review the document and prepare the final version which will be based on scientific background. A background document on the existing pollution hot spot situation will also be prepared. The meeting is scheduled to be convened in Athens from 5-6 April 2001 and participants will comprise environmental experts from Mediterranean countries. Financial experts from the World Bank will also be invited to participate, to ensure the appropriate inclusion of the financial aspects.

The revised criteria resulting from the experts consultation meeting will be submitted to the countries for their comments and/or approval. The criteria will be finalized and
particular emphasis will be placed on the severity of each of the environmental and socio-economic effects on identified hot spots. The agreed criteria and ranking system will be used by the countries for the agreed transboundary effects of the pollution hot spots in question. The same procedure will be followed for pollution sensitive areas but at a later stage.

Following the adoption of the criteria on pollution hot spots and sensitive areas, the countries will be responsible for updating the national reports on the basis of new or modified data if they exist, and/or anti-pollution measures implemented and update the list of national pollution hot spots. At this stage, national governments are expected to provide information relevant to their commitment to implement pollution reduction measures in certain hot spots areas that will be taken into consideration in the selection by the Ad hoc Technical Committee of pollution hot spots for pre-investment studies.

The Ad hoc Technical Committee will be convened to select national priority pollution hot spots, in consultation with the country concerned, which will be used for the preparation of pre-investment studies (PIS). In selecting areas for PIS, socio-economic criteria will also be considered as well as the national reports and the political will of the government to support the activity in question.

The preparation of pre-investment studies (PIS) will be undertaken by countries in cooperation with METAP. Towards this METAP will assist in the preparation of TORs for the PIS and the contract documents, assist in the selection of national consultants and assist in the contract negotiations. METAP will also supervise the preparation of the PIS and report to the Steering Committee and the Ad-hoc Technical Committee. METAP will clear payment to national consultants based on the satisfactory performance at successive stages of PIS preparation.

The expected results of the project in this field are:

C Investment portfolio of selected pollution hot spots for which pre-investment studies will have been conducted;

C Management plans for selected sensitive areas.

Pollution Hot Spots and Sensitive Areas – Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Output</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development of scientific and socio-economic criteria for the prioritization of pollution hot spots and sensitive areas</td>
<td>May 2001</td>
<td>Criteria document</td>
<td>WHO, METAP for socio-economic</td>
</tr>
<tr>
<td>Preparation of revised country reports according to the criteria adopted on pollution hot spots and sensitive areas</td>
<td>July - September 2001</td>
<td>Country reports</td>
<td>WHO, Countries</td>
</tr>
<tr>
<td>Meeting of the ad-hoc technical committee to select pollution hot spots for the preparation of pre-investment studies</td>
<td>September 2001</td>
<td>Report of the meeting</td>
<td>MAP/MED POL, WHO</td>
</tr>
<tr>
<td>Preparation of pre-investment studies</td>
<td>January - July 2001</td>
<td>Study concept notes</td>
<td>METAP</td>
</tr>
</tbody>
</table>
2. Regional cooperative actions

There is a need to improve at the regional level the administrative, legal and technical basis for pollution control, to assist the countries in the implementation of the SAP MED and the formulation of national action plans.

During the period of implementation of MED POL Phase II, a number of pollution control measures were formulated and adopted, covering the major marine pollutants of the region. The formulation of such measures was based on the requirements of the 1980 LBS Protocol. However, in 1996, the signature of the amended LBS Protocol, based on the new approach established by the 1995 GPA, brought forward the need for the re-formulation of the strategy to tackle land-based pollution. In addition, the SAP MED, adopted in 1997, builds on the new approach and introduces new objectives and new principles. It appears therefore necessary to prepare regional guidelines and action plans which would assist the countries of the region to strengthen the legal, technical and administrative basis to enable the implementation of the activities a) which are based on new principles and new ideas and which had not been dealt with by the MED POL Programme, such as the application of BAT and BEP, the management of hazardous wastes, the development of indicators and environmental inspection systems, and b) for which MED POL had indicated that further assistance was needed, such as sewage and treatment disposal, disposal of urban solid wastes, river monitoring and inventory of quantities and uses of POPs.

Activities under the Regional Cooperative Actions include the preparation and adoption of nine sets of regional guidelines for:

- sewage treatment and disposal;
- disposal of urban solid waste;
- industrial wastewater treatment and disposal;
- application of BAT, BEP and clean technologies in industries;
- application of BAT and BEP in industrial installations which are sources of BOD, nutrients and suspended solids;
- application of BEP for the rational use of fertilizers and the reduction of losses of nutrients from agriculture;
- environmental inspection system;
- development of ecological status and stress reduction indicators; and
- river (including estuaries) pollution monitoring programme;

It also includes the preparation and adoption of eight regional plans concerning:

- collection and disposal of all PCB waste;
C reduction of input of BOD by 50% by 2007;
C reduction by 20% by 2007 of the generation of hazardous waste from industrial installations;
C management of hazardous waste;
C regional inventory of quantities and uses of nine pesticides and PCBs, as well of industries which manufacture or condition them;
C establishment of regional pollution monitoring, reporting, and data quality assurance programmes for rivers;
C establishment of regional pollution monitoring, reporting, and data quality assurance programmes for the marine environment; and,
C collection of information on levels, trends and loads of pollution reaching the Mediterranean.

Regional Cooperative Actions – Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identification and recruitment of individual experts to review available information and prepare first draft of regional guidelines and plans</td>
<td>January 2001 - July 2001</td>
<td>MAP/MED POL/WHO</td>
</tr>
<tr>
<td>Preparation of first draft of regional guidelines and plans</td>
<td>September 2001 - September 2002</td>
<td>Experts supervised by MAP/MED POL/WHO</td>
</tr>
<tr>
<td>Review of first draft by small team of experts through correspondence</td>
<td>July 2002 - March 2003</td>
<td>MAP/MED POL/WHO</td>
</tr>
<tr>
<td>Meeting of government designated experts to review the regional guidelines</td>
<td>May 2003 Athens</td>
<td>MAP/MED POL/WHO</td>
</tr>
<tr>
<td>Meeting of government designated experts to review the regional plans</td>
<td>June 2003 Athens</td>
<td>MAP/MED POL/WHO</td>
</tr>
<tr>
<td>Meetings of respective Focal Points to approve guidelines and plans</td>
<td>October – December 2003</td>
<td>MAP/MED POL</td>
</tr>
</tbody>
</table>

Clean Production Technologies - Workplan and Timetable - Regional Guidelines and Plans

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Output</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of information on BATs and BEPs and cleaner technologies on the industrial sectors, specially those designed to the RAC/CP.</td>
<td>January 2001 to April 2001</td>
<td>Collection of technical information</td>
<td>RAC/CP Experts</td>
</tr>
<tr>
<td>Elaborate a working document as basis for the elaboration of the regional guidelines and plans.</td>
<td>April 2001 to June 2001</td>
<td>Working document</td>
<td>Experts RAC/CP</td>
</tr>
</tbody>
</table>
### 3. Capacity Building

At the national level, there is the need to improve the competence of the national administrative and technical experts in specific fields to enable the full implementation of the SAP MED and hence of the LBS Protocol.

In parallel to the work needed to be carried out at the regional level (see above), five specific fields were identified for which assistance was needed by national experts and administrators who will be in charge of the implementation of some of the SAP MED activities. During the implementation of MED POL in fact, it had already become apparent that the lack of trained personnel in the national administration could be an important limiting factor for the achievement of the over all objectives of the LBS Protocol, especially with regards to operation and maintenance of waste water treatment plants and river pollution monitoring; the SAP MED further identified some additional subjects for which specific competence was considered as generally lacking in many countries.

Activities under *Capacity Building* include the preparation and implementation of five regional training programmes. Participants in the training courses will be selected with the intention to improve the competence of the national administrative and technical experts in the implementation of the SAP MED. The following training programmes are foreseen to be undertaken:

- Environmental auditing and management;
- Pollution monitoring and inspection;
- Cleaner production techniques and practices;
- Operation and maintenance of waste water treatment plants;
- River pollution monitoring; and

The expected results from this activity are:

- Improved capacity of national administrators and technicians to deal with environmental problems and to enforce adopted legal instruments and regulations.
## CAPACITY BUILDING - Training Courses

### MEDU/METAP - Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Train-the-trainers’ workshops at the national level for environmental impact assessment</td>
<td>October 2001 - June 2002</td>
<td>METAP</td>
</tr>
<tr>
<td>Regional workshop on environmental impact assessment</td>
<td>September 2001</td>
<td>METAP</td>
</tr>
<tr>
<td>Regional training course on river pollution monitoring</td>
<td>November 2001</td>
<td>UNEP/MED POL</td>
</tr>
<tr>
<td>Two national training courses on river pollution monitoring</td>
<td>September - October 2002</td>
<td>UNEP/MED POL</td>
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<tr>
<td>Two national training courses on river pollution monitoring</td>
<td>September - October 2003</td>
<td>UNEP/MED POL</td>
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</table>

### WHO/MED POL - Workplan and Timetable

<table>
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<th>Activity</th>
<th>Timing</th>
<th>Output</th>
<th>Responsibility</th>
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</thead>
<tbody>
<tr>
<td>Regional training course on wastewater treatment plants operation and management</td>
<td>June 2001</td>
<td>Report and manual of training course</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Two national training courses on wastewater treatment plants operation and management</td>
<td>October 2001</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Regional training course on pollution monitoring and inspection</td>
<td>December 2001</td>
<td>Report and manual of training course</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Two national training courses on wastewater treatment plants operation and management</td>
<td>May 2002</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Two national training courses on pollution monitoring and inspection</td>
<td>July 2002</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Two national training courses on wastewater treatment plant operation and management</td>
<td>December 2003</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Two national training courses on pollution monitoring and inspection</td>
<td>July 2003</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>One national training course on wastewater treatment plant operation and management</td>
<td>September 2003</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
</tr>
<tr>
<td>Three national training courses on pollution monitoring and inspection</td>
<td>December 2003</td>
<td>Reports and manual of training courses</td>
<td>WHO/MED POL</td>
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</tbody>
</table>
Cleaner Production Technologies – Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Output</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation of training course with several kinds of information to approach cleaner production from different aspects: technical, economical, legal, etc.</td>
<td>January 2002 to June 2002</td>
<td>Training material</td>
<td>RAC/CP Experts</td>
</tr>
<tr>
<td>Preparation of case studies and success stories from industries of the Mediterranean countries.</td>
<td>January 2002 to June 2002</td>
<td>Training material</td>
<td>RAC/CP Experts</td>
</tr>
<tr>
<td>Meeting of technicians and governmental representatives in a selected country to check the success and problems of the prepared material.</td>
<td>October 2002 to February 2003</td>
<td>Report meeting</td>
<td>RAC/CP</td>
</tr>
<tr>
<td>Analyzing of the results obtained from this meeting.</td>
<td>March 2003 to April 2003</td>
<td>Final material</td>
<td>RAC/CP</td>
</tr>
<tr>
<td>Elaboration of the final material.</td>
<td>May 2003 to October 2003</td>
<td>Final material</td>
<td>RAC/CP</td>
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<tr>
<td>Submission of the final material to the 12th Contracting Parties Meeting for its adoption.</td>
<td></td>
<td></td>
<td>RAC/CP</td>
</tr>
<tr>
<td>Distribution to all the Mediterranean countries.</td>
<td>December 2003</td>
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<td>RAC/CP</td>
</tr>
</tbody>
</table>

4. **Sustainability of SAP MED**

There is a need to create a sustainable financial platform for continued implementation of the SAP MED. Activities include identification of economic instruments that will assist in developing a sustainable financial platform for the continued implementation of the SAP MED in the longer term and incorporation of such economic instruments at the national level in the National Action Plans. These activities will develop administrative, legal and fiscal mechanisms for the sustainable financing of the implementation of pollution control measures at country level. The introduction of such measures will also demonstrate their economic benefits and will catalyze the use of more integrated approaches to environmental management. These activities will be undertaken in close cooperation with country partners, relevant international organizations and institutions and appropriate regional experts.

This will include:

- development of appropriate economic instruments
- implementation of these at the national level
- training of national professionals in the area of economic instruments

The essence of the project is successful implementation, at national and regional level, of newly introduced and/or adapted existing economic instruments. The successful implementation should result in long-term sustainability of the SAP MED programme. Measures for sustainable implementation of economic instruments should be determined upon completion of country pilot projects and after an expert meeting to prepare proposals.
for introducing new / adapting existing economic instruments. These measures are likely to be country-specific, according to needs. Implementation procedure, therefore, should be proposed by and agreed upon with national and local governments. Measures should in the first place involve change in national and/or local legislation and regulation, where appropriate. Other means in support of the successful implementation of this component of the project include: improvement of environmental information database, capacity building of national and local institutions, training of government officials and non-government stakeholders, active involvement of general public in the Project, etc.

The analysis of the application of economic instruments in the Mediterranean countries has shown that economic instruments have been widely applied in practice. Most frequently applied economic instruments are "charges" since they have proven to be practical and efficient. Economic instruments are widely applied in the fields of water protection, land, industry, solid waste, i.e. in the fields with most apparent environmental problems. This analysis has also shown that the main problems of the application of economic instruments are: inadequate organization of administration and its low efficiency, failure to pay taxes, the human factor, small fines and inappropriate monitoring. The analysis has shown that economic instruments although not properly organized are still effective in practice. They have also shown that economic instruments as far as the purpose of their application is concerned are very efficient and their application results in the reduction of environmental pollution and the improvement of environmental quality. Economic instruments with incentive function have proven to be more effective than the non-incentive ones, which leads to the conclusion that new economic instruments should be considered.

After completing the 1994 analysis on application of economic instruments in selected Mediterranean countries, PAP/RAC continued to keep up with the latest developments in relevant scientific theories. There is constant flow of information through an economic instruments' network of experts established by PAP/RAC. The activities of the World Bank in the field are also followed by PAP/RAC.

The activities foreseen for the sustainability aspects of the project are:

- An expert meeting to adapt the existing evaluation methodology of economic instruments in order to assess sustainability of the SAP MED in eligible Mediterranean countries.

- A seminar to determine the state of art in implementation of economic instruments, to determine changes in their application in the period 1994-1999, train selected national experts on application of economic instruments and to define specific environmental and other purposes given by national governments to be met by implementation of economic instruments at national level.

- Dissemination of the state-of-art analysis to national government institutions.

- Selection of a baseline pilot project, set terms of reference of the pilot project, sign relevant country agreement on preparation of project.

- An expert meeting to prepare proposals for introducing new / adapting existing economic instruments at national level.

- Dissemination of the proposals for introducing new / adapting existing economic instruments.
- Help to national and local institutions and experts in implementing proposed measures in economic instrument application at national and regional level, with special emphasis on making the SAP MED programme sustainable.

**Assistance to countries in activities regarding the sustainability of SAP MED**

- Dissemination of questionnaires on the state-of-art in application of economic instruments in selected countries, sign contracts with national experts.

- Conducting comparative analysis of economic instruments’ application for environmental purposes in selected Mediterranean countries

- Requesting national focal points to qualify for a baseline pilot-project on economic instruments’ application, prepare and submit workplans and timetables.

- Cooperation with national and local institutions and experts on implementation of the baseline pilot project.

- Cooperation with national and local institutions and experts on implementation of five additional pilot projects in selected Mediterranean countries.

- Evaluation of newly introduced / adapted economic instruments at regional and national level.

### Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Output</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expert meeting to adapt the existing evaluation methodology of economic</td>
<td>January 2001</td>
<td>Methodological paper, expert meeting report; questionnaire</td>
<td>NFPs, PAP/RAC, World Bank</td>
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<tr>
<td>instruments in order to assess sustainability of the SAP MED</td>
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<td>Instructive seminar to determine the state of art in implementation of</td>
<td>June 2001</td>
<td>Final state-of-art analysis on the existing implementation of economic instruments in Mediterranean countries, Trained national experts, Seminar report</td>
<td>NFPs, PAP/RAC, World Bank</td>
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<tr>
<td>period 1994-1999, to train selected national experts and to determine</td>
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<td>specific environmental purposes given by national governments to be</td>
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<td>met by implementation of economic instruments at national level</td>
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<tr>
<td>Dissemination of the state-of-art analysis to national govt. institutions</td>
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<td>PAP/RAC</td>
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<tr>
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<td>Expert meeting to prepare proposals for introducing new / adapting</td>
<td>June 2002</td>
<td>Expert meeting report</td>
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</table>
5. **Public participation**

There is an urgent need to collect information about the existing participation tools, methodologies and techniques used for informing the public at the national level; also, for involving it in decision making by reaching consensus and by resolving conflicts between various sectors or different interest groups. There is a need for the development and implementation of a regional programme of participation that will involve the NGOs and include provision of information to the general public.

The participation of the public (NGOs, etc), at all stages of the preparation and in the implementation of the National Action Plans in each country is a primary aim of the project.

### Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timing</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation of a proposal for a regional programme for public participation</td>
<td>August - December 2001</td>
<td>UNEP/MEDU</td>
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<tr>
<td>Meeting of national representatives and NGOs to develop a regional programme for public participation</td>
<td>May 2002</td>
<td>UNEP/MEDU</td>
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</table>
6. **National Action Plans**

There is a need to assist national administrations to formulate and implement National Action Plans (NAPs) specifically related to the elimination of pollution from land-based activities.

The formulation of NAPs can be considered as the final output of all the activities of this Project; their implementation represents in fact the operational long-term result of the Project and it is supposed to make use of the results of the individual activities. The NAPs will in fact take into account of the work carried out on the hot spots and sensitive areas, will consider the translation at the national level of the regional guidelines and regional action plans, of the SAP for biodiversity, of mechanisms for the long-term sustainability of the SAP MED and of plans for public participation in the preparation and implementation of the SAP MED. Considering that the process of formulating NAPs related to the elimination of land-based pollution is, generally speaking, a new process, based on new legal texts such as the LBS Protocol and the SAP MED, there is a clear need to assist the national administrations, and in particular the Inter-ministerial Committees created in each country as part of the Project, in the formulation of NAPs and in identifying the mechanisms for their long-term implementation.

The preparation of National Action Plan modalities and what they should aim at and contain is spelled out in some detail in the Annex.

The expected output of the project is the development and implementation of a National Action Plan for each country.

### National Action Plans – Workplan and Timetable

<table>
<thead>
<tr>
<th>Activity (in each country)</th>
<th>Timing</th>
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</tr>
</thead>
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<tr>
<td>Contacts with national authorities for the creation of inter-ministerial committee</td>
<td>September 2001 to June 2002</td>
<td>National authorities</td>
</tr>
<tr>
<td>Contacts with national authorities for the appointment of Coordinator of Committee and expert</td>
<td>January to July 2001</td>
<td>National authorities in consultation with MAP</td>
</tr>
<tr>
<td>Preparation of draft sectorial plans; meetings of experts and of Inter-ministerial Committee</td>
<td>September 2001 to July 2002</td>
<td>National experts in consultation with MAP</td>
</tr>
<tr>
<td>Preparation of draft integrated National Action Plan; meetings of experts and of Inter-ministerial Committee</td>
<td>September 2002 to September 2003</td>
<td>National experts in consultation with MAP</td>
</tr>
<tr>
<td>Formal adoption of National Action Plan; meeting of national authorities</td>
<td>December 2003</td>
<td>National authorities</td>
</tr>
</tbody>
</table>
5. Institutional aspects of implementing the project

1. Project Coordination

The project is managed by the Coordinating Unit for the Mediterranean Action Plan. For this purpose, a project manager has been hired. He reports directly to the MAP Coordinator. The following committees have been established, or are in the process of being established, in accordance with the provisions of the project agreement:

Inter-Agency Steering Committee

This committee is composed of the implementing and donor agencies. It is chaired by the lead implementing Agency (UNEP), in accordance with the agreed procedures for GEF International Waters Projects and includes representatives from the UNEP GEF Coordination Unit, UNEP/MEDU, GEF, UNDP, the World Bank, METAP and French GEF (FFEM), as well as other donors which will participate following the donors meeting. This committee will overview the execution of the project and will decide on the precise modalities for execution and coordination of the activities. It is expected to meet once a year.

Coordination Committee

This committee is composed of the members of the Inter-Agency Steering Committee and by nationally nominated coordinators for activities undertaken in the framework of the project. The Coordination Committee is expected to meet once a year and right after the meeting of the Inter-Agency Steering Committee. It will be briefed on the progress of the activities.

Ad-hoc Technical Committee

This committee will be composed of representatives from MAP/MED POL, WHO/MAP, METAP and its partners, GEF and FFEM. It will be responsible for the coordination of the implementation of the pre-investment studies and METAP will follow up technically the implementation of these studies. However, the pre-investment studies will be undertaken under the responsibility of the Governments themselves, with the guidance of the Ad-hoc Technical Committee.

MAP has the overall responsibility of the management of the project. In its execution it will be assisted by MED POL and by the MAP Regional Activity Centres. More specifically, MED POL in cooperation with WHO/MAP will be the main actors in the implementation of the project having the responsibility for pollution hot spots and sensitive areas, pre-investment studies, preparation of regional action plans and guidelines and most of the training programmes. PAP/RAC will have the responsibility of the component on the sustainability of SAP MED and the organization of the training programme on integrated coastal zone management. SPA/RAC will be responsible for the preparation of the SAP on biodiversity (see below for the details of the mechanisms for the implementation of this activity). CP/RAC will assist in the preparation and adoption of three regional guidelines, one regional plan and the organization of one training programme.

METAP as a member of the Ad-hoc Technical Committee will be responsible for following the pre-investment studies and advising the Governments accordingly. The World Bank is expected to cooperate in the preparation of the economic instruments.
Development of a SAP for biodiversity

Though it is outside the terms of reference of the Coordinating Committee, reference is made here of the institutional arrangements for the preparation of the Strategic Action Plan for biodiversity (SAP BIO) of the project for information reasons.

Besides SPA/RAC, which holds the overall responsibility of the project under the supervision of the MAP Coordinating Unit, the following main actors/elements are expected to be identified and take part in the process:

National correspondents: Person responsible for the running of the project at the national level in each of the participating countries. Their main role is to stimulate and coordinate activities at the national level aimed at providing inputs to the SAP. This should include the definition and the coordination of the national consultation process. He/she will constitute the main contact point of SPA/RAC at the national level, and will participate in regional meetings convened by SPA/RAC to examine the progress of the preparation of the SAP and refine the documents being prepared. National correspondents are appointed by the MAP National Focal Points.

Advisory Committee: Expected to have a role of technical advice in the process of elaboration of the SAP. It will be established at the outset of the project and will include representatives of international and regional bodies with technical and scientific expertise in Mediterranean marine and coastal biodiversity issues (e.g. WWF - International Mediterranean Programme; IUCN Mediterranean Programme; the MedWet programme carried out under the auspices of the Ramsar Convention; FAO; Council of Europe (Secretariat of the Bern Convention); European Topic Centre/Nature Conservation (ETC/NC); Arab League (ALECSO); ACCOBAMS Interim Secretariat).

IGOs/NGOs: Besides the participation of some of them in the Advisory Committee, they are expected to intervene in national and/or regional activities.

2. Project coordination and participation at the National level

Many of the activities foreseen in the project require active participation at the national level. Key elements in this, from an institutional point of view, are:

C The appointment of National Coordinators by the MAP Focal Points. In response to a request from MAP many countries have already nominated National Coordinators (and National correspondents for SAP BIO). The National Coordinators are expected to coordinate the activities of the Inter-Ministerial Committees to be established at the national level.

C The setting up of Inter-Ministerial Committees. These are foreseen to be set up during 2001. They are expected to coordinate actions and activities directed at the effective preparation of the National Action Plans, in the spirit of building a consensus at the national level.

It is foreseen that assistance will be given to the countries for a variety of activities at the national level, as mentioned in this document. The modalities for this assistance will vary according to the needs and the activity. It is foreseen that this assistance will be provided under appropriate Memorandums of Understanding (MoUs).
ANNEX

The preparation of National Action Plans and Programmes

a. The preparation of National Action Plans

The formulation of National Action Plans (NAPs) represents the operational long-term aim of the Strategic Action Programme, as the National Action Plans are expected to make use of the results of the individual activities identified in the SAP. According to the Programme, the Contracting Parties will develop or review and adopt, by the end of 2003 at the latest, National Action Plans (NAPs) addressing pollution from land-based sources. This implies the adoption of the targets and activities identified in the SAP. Action towards the implementation of the NAPs is to be pursued *inter alia* through international cooperation. National Action Plans are foreseen to focus on sustainable, pragmatic and integrated environmental management approaches and processes, such as integrated coastal area management, harmonized, as appropriate, with river basin management and land-use plans. Towards this end the work planned under the sustainability of the SAP MED on the development of economic instruments and on their implementation at the national level will play a significant role, as will capacity building of national professionals in the use of these instruments.

Following the preparation of a national diagnostic analysis, to identify and assess national problems and issues, in 2001, sectoral programmes will start to be prepared containing the actions required to reach the respective regionally adopted targets. The programmes, to be prepared by small national working teams, will consist of actions necessary to fulfill the relevant provisions adopted on a regional level such as regional plans, guidelines, common measures, environmental quality criteria, emission/effluent limits, capacity building activities, etc. National experts, in consultation and with assistance from the MAP/GEF project, will, in 2002-2003, prepare, on the basis of the sectoral programmes, the National Action Plans. These are expected to be submitted to the national authorities for formal adoption. The Mediterranean GEF Project foresees the provision of support to the national Inter-Ministerial Committees in the development and implementation of individual National Action Plans.

If needed, international experts will be recruited to assist in the preparation of the National Action Plans. In the countries where National Environmental Action Plans (NEAPs) have been adopted, the National Action Plans for LBS must be consistent with the NEAPs.

The general objective of a National Action Plan is, *to eliminate pollution deriving from land-based sources and activities, and, in particular, to phase out inputs of the substances that are toxic, persistent and liable to bioaccumulate, as listed in annex I to the LBS Protocol.*

The specific objectives of the National Action Plans are:

- The formulation of principles, approaches, measures, timetables and priorities for action;
- The preparation of a national priority list for intervention and investment ("investment portfolio");
- The analysis of expected baseline and additional actions needed to resolve each transboundary priority problem;
• The identification of potential roles for Non-Governmental Organizations in the preparation and implementation of the NAP.

The National Diagnostic Analysis to establish national priorities for action combines five elements:

• identification of the nature and severity of problems;
• identification of contaminants;
• identification of physical alterations and degradation of habitats;
• identification of sources of degradation;
• identification of areas (spatial) of concern;

In addition to the results of the National Diagnostic Analysis, national priorities for action will take into account national reports on “pollution hot spots and sensitive areas” as well as the provisions of the LBS Protocol. Priorities for action should specifically reflect:

• the relative importance of impacts upon food safety, public health, coastal and marine resources, the health of the ecosystem and socio-economic benefits, including cultural values; and
• the costs, benefits and feasibility of options for action, including the long-term cost of no action.

b. The preparation of sectoral programmes

Sectoral programmes will form the basis of the National Action Plans and will therefore be prepared for all the priority areas for action to control pollution from land based sources identified in the SAP. The preparation of a list of activities containing the actions required to reach the respective regionally adopted targets, will commence by 2002 and will be carried out by national experts in consultation with the MAP/GEF project.

A description is provided below of proposed activities related to a number of priority areas of particular relevance to the MED POL Programme:

i) The development of national programmes for the environmentally sound management of sewage.

National programmes for the environmentally sound management of sewage are expected to include the following activities, which have been specified in the SAP:

• The connection, by 2005, of all coastal cities and urban agglomerations of more than 100,000 inhabitants, to a sewer system as well as the disposal of sewage in conformity with a national regulation system
• The location of coastal outfalls so as to obtain or maintain agreed environmental and health quality criteria;
• The promotion of primary, secondary and where appropriate and feasible tertiary treatment of municipal sewage;
• The satisfactory operation and maintenance of sewage treatment facilities;
• The reuse of treated effluents for the conservation of water resources, accompanied by infrastructural measures, treatment at source and the segregation of industrial effluents, where required;
• The appropriate design of treatment plants and controls of the quality of effluent wastewaters in accordance with national regulations, for the beneficial reuses of sewage effluents and sludges;

• The environmentally sound treatment of combined domestic and compatible industrial effluents;

• The separate collection of rain water and municipal waste water and treatment of the first rain water considered particularly polluting;

• The environmentally sound disposal and/or use (composting, landfilling etc.) of sewage sludge;

• The prohibition of sludge discharge into water in the Protocol Area;

ii) The development of national programmes for the reduction at source and environmentally sound management of urban solid waste.

National programmes for the reduction at source and environmentally sound management of urban solid waste are expected to take into account the following targets specified in the SAP:

• The establishment, by 2005, of environmentally sound and economically feasible systems of collection and disposal of urban solid waste in cities and urban agglomerations of more than 100,000 inhabitants;

In relation to the implementation of this target of the SAP, the following could also be taken into consideration:

- The creation of selective garbage collection systems;
- The environmentally sound location of urban solid waste disposal sites;

• The promotion of urban solid waste reduction and recycling

• The implementation of national training programmes proposed to commence in 2002-2003, on effective waste reduction policies and on the environmentally sound management of urban solid waste, including options for recycling and environmentally sound elimination;

iii) The development of national programmes to control air pollution from mobile sources

Taking into consideration the regional policy to be developed on the promotion of measures to implement the Framework Convention on Climate Change (Kyoto Protocol), national authorities are expected to adopt, wherever feasible, measures to control emissions of carbon dioxide, e.g. through the promotion of energy conservation and energy efficiency. National programmes to control air pollution from mobile sources are expected to include the following activities, which have been specified in the SAP:

• Measures to promote and provide incentives for public transportation;

• Measures for the promotion of improved traffic management, giving priority to the use of public transport;

• Measures for the promotion of lead-free petrol, also containing low level aromatic hydrocarbons;

• Measures for the improved inspection and maintenance of vehicles and the replacement of old-technology vehicles through economic incentives;
• Measures to promote increased regional and domestic introduction of natural gas;
• Measures to promote the introduction of gaseous fuel or other alternative forms of energy to substitute diesel fuel in public transportation, particularly buses;
• Measures to support and encourage the participation of public transport services in the above activities;

iv) To prepare national programmes for the reduction and control of pollution by the heavy metals, mercury, cadmium and lead.

National programmes for the reduction and control of inputs of the heavy metals mercury, cadmium and lead are expected to include the following activities, which have been specified in the SAP:

• The adoption at the national level by 2005 at the latest and application of the common measures for preventing mercury pollution adopted by the Parties in 1987 (releases into the sea max. conc. 0.050 mg/l);
• The adoption at the national level by 2005 at the latest and application of the pollution prevention and control measures for cadmium and cadmium compounds adopted by the Parties in 1989 (releases into the sea max. conc. 0.2 mg/l);
• The adoption and application by 2005 at the latest in the industries of the alkaline chloride electrolysis sector, the maximum value of 0.5g of mercury in the water per tonne of chlorine production capacity (brine recirculation), 5g of mercury in the water per tonne (lost brine technology) and, 2g of mercury from total releases into water, air and products.

v) To prepare national programmes for the reduction and control of pollution by the following organohalogen compounds:

- Halogenated Aliphatic Hydrocarbons (chlorinated solvents, chlorinated paraffins)
- Halogenated Aromatic Hydrocarbons [Chlorobenzenes, polychlorinated naphtalenes, polybrominated diphenyl ethers (PBDEs) and polybrominated biphenyls (PBBs)]
- Chlorinated Phenolic compounds
- Organohalogenated pesticides

National programmes for the reduction and control of pollution by the above organohalogen compounds are expected to include the following activities which have been specified in the SAP:

• To adopt at the national level and apply by 2005 at the latest, the common measures for the control of pollution by organohalogen compounds adopted by the Parties;
• To reduce the use of short-chained chlorinated paraffins in accordance with the LBS Protocol and internationally agreed provisions for the safeguarding of the environment and human health;
• To regulate, by the year 2005 at the latest, releases of organochlorines by the paper and paper pulp industries by limiting discharges measured as AOX (adsorbable organic halogen) to 1 kg per ton of paper pulp produced and by reducing it further in accordance with internationally agreed provisions, through the promotion of BEP and BAT and the promotion of alternative bleaching to the use of molecular chlorine;
• To reduce and control the manufacture of PBDEs and PBBs in accordance with the LBS Protocol and other regionally and internationally agreed provisions;
• To reduce and control the manufacture and use of certain pesticides, such as lindane, 2,4-D and 2,5-T herbicides, and tri- tetra- and penta- chlorophenols, used in the treatment of wood, in accordance with the LBS Protocol and other regionally and internationally agreed provisions for the safeguarding of the environment and human health.

vi) To develop national programmes for the environmentally sound management of wastewater and solid waste from industrial installations which are sources of BOD.

National programmes for the environmentally sound management of wastewater and solid waste from industrial installations are expected to include the following activities that have been specified in the SAP:

• The disposal of all waste water from industrial installations, which are sources of BOD, nutrients and suspended solids, located in areas of concern, in conformity with a national regulation system to be formulated and adopted by 2002;
• The location of coastal outfalls so as to obtain or maintain agreed environmental quality criteria;
• The promotion of primary, secondary and where appropriate and feasible tertiary treatment of BOD waste water discharged into rivers, estuaries and the sea;
• The sound operation and proper maintenance of facilities, to be promoted through the organization of relevant training programmes;
• The implementation of measures for the reduction and beneficial use of waste-water or other measures appropriate to specific sites such as no-water and low-water solutions, to be facilitated through the organization of relevant training programmes and/or workshops;
• The environmentally sound disposal and/or use (composting, landfilling etc.) of sludge and other wastes, to be facilitated through the organization of relevant training programmes and/or workshops.

c. Additional activities to be included in the National Action Plans

The following activities which have been specified in the SAP and are considered as priority areas for action, are also expected to be taken into full account in the preparation of National Action Plans to control pollution from land based activities:

i) Updating and adopting of national regulations on sewage discharges to the sea and rivers

National regulations on sewage discharges into the sea and rivers are expected to be updated taking into account the provisions of the LBS Protocol, particularly Annex II and, where appropriate, the common measures on sewage discharges into the sea and rivers already adopted by the Contracting Parties. Regional guidelines for sewage treatment and disposal, environmental quality criteria and standards will assist Mediterranean countries to establish national legislation according to existing conditions. The work on the process for updating the regulations will start in the period 2001-2002. Parties requiring assistance in the formulation of updated regulations will be eligible for expert legal and/or technical assistance to be provided through the project.
ii) Establishing a system of previous authorization by competent national authorities for works which cause physical alterations of the natural state of the coastline or the degradation of coastal habitats

The preparation of national regulations will be initiated in the biennium 2001-2002, for the establishment of a system of previous authorization by competent national authorities for projects having a potential impact on the natural state of the coastline or on coastal habitats.

iii) Phasing out the use of the nine pesticides, except for those for which WHO recommendations related to the safeguarding of human life suggest otherwise

A report on the implementation of this activity according to the requirements of the SAP will be prepared and submitted, through the Secretariat, to the Contracting Parties. Requests by the Parties may be made for expert legal and/or technical assistance from the project in the timely implementation of this action.

iv) Prohibiting the manufacture, trade and new uses of PCBs

A report on the adoption of national regulation prohibiting the manufacture, trade and new uses of PCBs according to the requirements of the SAP will be prepared and submitted, through the Secretariat, to the Contracting Parties. Requests by the Parties may be made for expert technical and/or legal assistance from the project in the timely implementation of this action.
ANNEX IV

Budget of the project “Determination of Priority Actions for the further Elaboration and Implementation of the Strategic Action Programme for the Mediterranean Sea”
## Annex IV
### Consolidated Budget for GEF Project
#### 2001-2003
##### (in US $000)

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<td>3300 Meetings/conferences</td>
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### CONSOLIDATED BUDGET FOR GEF PROJECT

#### 2001-2003

(in US $ 000)

| Component                        | GEF | MTF | FFEM | GEF | MTF | CP/RAC | FFEM | GEF | MTF | CP/RAC | FFEM | GEF | MTF | CP/RAC | FFEM | GEF | MTF | CP/RAC | FFEM | GEF | MTF | CP/RAC | FFEM | GEF | MTF | CP/RAC | FFEM | GEF | MTF | CP/RAC | FFEM |
|----------------------------------|-----|-----|------|-----|-----|--------|------|-----|-----|--------|------|-----|-----|--------|------|-----|-----|--------|------|-----|-----|--------|------|-----|-----|--------|------|-----|-----|--------|------|-----|-----|--------|------|
| **50 MISCELLANEOUS COMPONENT**   |     |     |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5200 Reporting Costs             |     |     |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5201 Reporting                   | 20  | 30  | 30   | 10  | 60  | 30     | 0    | 0   | 0   | 90    |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5202                             |     | 0   | 0    | 0   | 0   | 0      |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5220 Unspecified                 |     |     | 0    | 0   |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5299 Total                       | 0   | 20  | 0    | 30  | 0   | 0      | 0    | 0   | 0   | 30    | 10   | 60  | 30  | 0      |      |     |     |        |      |     |     |        |      |     |     |        |      |
| **5300 Sundry**                  |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5301 Communications (telephone, telefax, etc.) |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5304 Other                       |     | 0   | 0    | 0   | 0   | 0      |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 5399 Total                       | 0   | 0   | 0    | 0   | 0   | 0      | 0    | 0   | 0   | 0     | 0    | 0   | 0   | 0      |      |     |     |        |      |     |     |        |      |     |     |        |      |
| **5999 COMPONENT TOTAL**         | 0   | 20  | 0    | 30  | 0   | 0      | 0    | 0   | 0   | 30    | 10   | 60  | 30  | 0      |      |     |     |        |      |     |     |        |      |     |     |        |      |
| **60 UNEP PARTICIPATION**        |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 6550 Evaluation Costs            |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 6551 Evaluation costs (fees, travel, DSA) |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 6552 Administrative support (FMO) |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 6553 Travel and DSA (UNEP Staff) |     |     |      |     |     |        |      |     |     |       |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |
| 6559 Total                       | 49  | 0   | 0    | 51  | 0   | 0      | 0    | 108 | 0    | 0     | 208  | 0   | 0   | 0      |      |     |     |        |      |     |     |        |      |     |     |        |      |
| **6999 COMPONENT TOTAL**         | 49  | 0   | 0    | 51  | 0   | 0      | 0    | 108 | 0    | 0     | 208  | 0   | 0   | 0      |      |     |     |        |      |     |     |        |      |     |     |        |      |
| **99 GRAND TOTAL**               | 1,576 | 444 | 210  | 2572 | 134 | 40      | 1200 | 1921 | 257  | 190  | 6069 | 835 | 40 | 1600   | 8,544 |     |     |        |      |     |     |        |      |     |     |        |      |
| TOTAL PER YEAR                   | 2230 | 3946 | 2368 | 8544 |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |     |     |        |      |