
**MEDITERRANEAN ACTION PLAN (MAP)
REGIONAL MARINE POLLUTION EMERGENCY RESPONSE CENTRE FOR THE
MEDITERRANEAN SEA (REMPEC)**

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Gas Group (OFOG) Sub-Group on Environmental Impact

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Agenda Item 3: Mediterranean Offshore Action Plan - 2026-2035

Gap Analysis of the Mediterranean Offshore Action Plan (MOAP) for the period 2016-2024

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Note by the Secretariat

This document has been prepared in accordance with the agreement by the Ad Hoc Internal Group of MAP Components coordinated by REMPEC within the context of the review and updating of the Mediterranean Offshore Action Plan (MOAP). It provides an overview of key outcomes from the Gap Analysis of MOAP 2016-2024, carried out with the aim of identifying areas requiring updating and critical areas requiring improvement.

Background

1. In accordance with the Twenty Third Meeting of the Contracting Parties to the Barcelona Convention Decision IG.26/14 on the United Nations Environment Programme (UNEP)/Mediterranean Action Plan (MAP) Programme of Work and Budget for the Biennium 2024-2025, a process for the review and update of the Mediterranean Offshore Action Plan 2016-2024 (the process) was considered and funds allocated. The process has been launched through the work of an As Hoc Internal Group of MAP Components coordinated by REMPEC and consisted of:

- .1 the development of a set of background documents, including a gap analysis and an assessment of the implementation of the MOAP (2016-2024), the projection for the offshore sector in the Mediterranean for the period 2026-2035, the existing policies and regulatory developments in place in the field of offshore installations; and
- .2 the development of an updated MOAP for the period 2026-2035 based on the guiding principle that the MOAP 2026-2035 is a continuation of the previous MOAP, its objectives and partially achieved outcomes. Regarding the governance aspects, i.e. the role of MAP Components and necessary Partnership for its implementation, are addressed, and the resource mobilization is integrated within the MOAP, and aligned with the updated MAP RMS adopted by COP 23.

2. The summary of the main outcomes from the gap analysis of MOAP 2016-2024, carried out with the aim of identifying areas requiring updating and critical areas requiring improvement are set out in the **Annex**.

Actions requested by the Meeting

3. The Meeting is invited **to take note** of the information provided.

Annex

Summary of the main outcomes of a Gap Analysis of the MOAP 2016-2024

MOAP 2026-2035

Summary of the main outcomes of a Gap Analysis of the MOAP 2016-2024

Introduction

1. This document summarizes the main outcomes of a Gap Analysis of the Mediterranean Offshore Action Plan (MOAP) 2016-2024 and proposes key elements to be taken into account when updating the MOAP 2026-2035.

2. Analyzing whether the Specific Objectives (SOs) of the MOAP 2016-2024 have been met requires assessment tools that rely on robust data and information. Whilst specific performance indicators (PIs), that rely on data and information, might exist for monitoring the impact of pollution from offshore activities (Integrated Monitoring and Assessment Programme of the Mediterranean Sea and Coast (IMAP) process refers), no such PIs have been developed to assess progress to reach the SOs of the MOAP 2016-2024 and consequently the overall implementation of the MOAP.

3. In the absence of such robust data and information, the approach taken in this analysis was, to the extent possible, to compare the achievements, with the expected outputs of the MOAP, for both the CPs and Secretariat, using certain subjective criteria such as governance and budget, impact of the implementation, etc, and then to provide comments for each.

Gaps identified

4. It is recalled that Decision IG. 21/8 (COP18):

- i. recognized the dual nature of the Protocol which not only addresses the environmental impact of offshore activities but also the safety of processes involved in such operations thus providing a regional holistic approach to the protection of the marine environment in the Mediterranean;
- ii. decided that the Barcelona Convention Offshore Oil and Gas Group (BARCO OFOG) should be financed through extra budgetary resources; and
- iii. called upon that: the composition of the OFOG Group and Sub-Group shall be published and kept up to date on a dedicated website.

5. **Table 1** contained in the **Appendix** provides a summary of activities undertaken under the MOAP 2016-2024 and proposes key elements to be taken into account when framing the MOAP 2026-2035. The proposals put forward are based on observations made as well as the information obtained and knowledge gained in the process of undertaking this gap analysis.

6. In the main, this document reiterates the gaps previously identified (REMPEC working documents EP/MED WG.498/5, REMPEC/WG.55/5, and REMPEC/WG.55/8 refers) which in essence highlighted that not enough resources were allocated to implement the outputs of the MOAP in what can be described as a “too ambitious” action plan for the resources available.

7. A number of observations, which could be considered of a governance and institutional nature were also noted whilst undertaking the current analysis, namely:

- i. Despite the recognition that a variety of expertise is required to implement the Offshore Protocol and the MOAP, no meeting of the OFOG Sub-group on Health and Safety has been organized over the decade. This has led to the near impossibility of addressing certain outputs of a safety nature;
- ii. The Meetings of the OFOG Sub-Group on Environmental Impact have been funded through the Mediterranean Trust Fund (MTF). Providing funding for an inter-governmental

meeting such as this OFOG Sub-Group on Environmental Impact without the concomitant funding for a well-structured capacity building programme including training activities will impact the implementation of the MOAP and ultimately the implementation of the Protocol; and

- iii. There is no Regional Activity Centre (RAC) and more importantly no permanent person within the institutional MAP arrangements (Coordination Unit (CU) and RACs) entrusted to follow the implementation of the Offshore Protocol provisions. Neither is there a dedicated website other than a small section dedicated to “Offshore Activities” on the REMPEC Website. This has led to the near impossibility of raising awareness on the Offshore Protocol or addressing some outputs such as those promoting the benefits of the Offshore Protocol and, just as significant, has a direct impact on whether the system can catalyze the participation of CPs on offshore related initiatives.
8. From the observations above, the following gaps can be identified:
- i. There is no designated institutional component, existing or new, to act as a point of contact to facilitate the implementation of the provisions of the Offshore Protocol and the MOAP;
 - ii. There is no permanent position in the MAP institutional arrangement to coordinate the implementation of the MOAP;
 - iii. Despite Decision IG.21/8, there is an expectation that the Meetings of the OFOG Sub-Group on EI are funded by the MTF, with no funding for the Sub-Group on Health and Safety or the umbrella OFOG Group. The establishment of which are called for in SO2 of the MOAP 2016-2024;
 - iv. The development of common standards and guidelines relies on the ad-hoc funding from the MTF;
 - v. The capacity building programme relies heavily on ad-hoc funding which is even more meagre than the ad-hoc funding available for the OFOG meetings; and
 - vi. There is no real coordination of the Programme of Work on the Offshore Protocol within the MAP institutional system.
9. The implications for the MOAP 2026 -2035 are to:
- i. Reduce the ambition and expectation of the MOAP 2026-2035, especially the number of outputs related to collecting/centralizing/exchanging/disseminating information for capacity building with consequences for the visibility of the Offshore Protocol;
 - ii. Establish one umbrella OFOG Group which will incorporate Health and Safety as well as Environment, but ensuring that the CPs are well represented with adequate expertise;
 - iii. Continue with the development of the remaining common Standards and Guidelines relying solely on consultancies;
 - iv. Organize online training related to the remaining common Standards and Guidelines but on an ad-hoc basis depending of funding availability;
 - v. Relying on the current arrangement which would signify relying on the current institutional arrangement to track progress; and
 - vi. Explore how to ensure that the appropriate oversight takes place for Offshore activities which are beyond the competencies of the parent UN bodies responsible for the regional legal framework in the Mediterranean, specifically UNEP and IMO.

Bridging the gaps

10. The key gap to be addressed, as a priority, is one already identified at the 3rd Meeting of the OFOG (working document EP/MED WG.498/6) which calls for securing continuity through a fixed-term staff position on the Offshore Protocol, which would possibly address the incongruity of a Protocol without a dedicated RAC to coordinate activities and ensure follow-up. That said, if the decision is taken that implementation of the Offshore Protocol becomes the sole responsibility of one of the existing RACs, assigning the responsibility to a RAC overcomes the challenge of the current diffused institutional state of responsibility which presently exists where that responsibility is shared between the CU and a RAC, more specifically REMPEC.

11. Securing a dedicated staff post on the Offshore Protocol within one of the MAP institutional arrangements (CU or RACs) should, as a minimum, address some of the following gaps and will:

- i. Provide a focal point within the MAP institutional arrangements to facilitate exchanges among the CPs and the MAP components;
- ii. Coordinate the implementation of the Offshore Protocol by centralizing and disseminating information through the social media and/or other platforms increasing the visibility of the benefits of Offshore Protocol;
- iii. Facilitate the establishment of a well-structured capacity building programme;
- iv. Facilitate the identification of potential donors and/or build a network of contributors to support activities ensuring continuity with relevant stakeholders; and
- v. Facilitate exchanges among the MAP components including the CU which can provide clarity on funding and clarity on the governance of the Protocol, and the implementation of the MOAP.

12. In addition, the new MOAP would benefit from:

- i. A commitment that the meetings of the OFOG are supported by the MTF. In this regard, while it is recognized that funding limitations exist, and that additional activities should be financed through extra budgetary resources, at least one capacity building activity, funded by the MTF, is carried out annually;
- ii. A streamlining of the two OFOG Sub-groups with a view that there is only one OFOG which addresses both the Environmental Impacts as well as Health and Safety (as per the Protocol). Consequently, the CPs will need to designate representatives with the appropriate competencies to cover the varied subject matter of the Protocol. Indeed, this might have an impact on the funding required for such meetings; and
- iii. Performance indicators (main/qualitative indicators) are developed to monitor what is achieved under the SOs of the Action Plan (e.g: number of ratifications, number of common standards and guidelines approved, number of persons trained, progresses made for reducing the main pressures on the marine environment from oil and gas activities, etc).

Moving Forward

13. Addressing these gaps requires funds and the content and the ambition reflected in the MOAP 2026-2035 is very much dependent on securing these funds since it would seem that no new funds from the MTF, other than the current meagre funds, are being envisaged. Indeed, a Resource Mobilisation Strategy (RMS) or framework can be developed to secure extra funding but this will rely on donor funding. Given that oil and gas activities are seen to be mostly of interest to multi-national companies, and the big oil and gas majors whilst countries act solely as the regulator, realistically, it is highly unlikely that extra-budgetary funding from the usual sources that the Barcelona Convention System is dependent on, will be forthcoming.

14. Furthermore, given that there are many initiatives both nationally and internationally to curtail the use of hydrocarbons as an energy source and alternative climate friendly fuels are being developed and sought, it could prove difficult to attract interest in this thematic area from international funding

mechanisms as this thematic area will not be considered a priority. In this connection, it should also be mentioned that a RMS whilst useful, will take time to be implemented and even longer to see its benefits. Thus, financial shortcomings, in the short to medium term will remain, which need to be seriously addressed.

15. Given the above, two alternatives for developing the MOAP 2025-2035 can be put forward:

- 1) Consider the existing business as usual scenario for implementation of the Protocol and the MOAP, which would essentially require updating of the MOAP reflecting the achievements over the period of the MOAP 2016- 2025 and lowering the ambitions in terms of outputs; or
- 2) Consider that all the gaps can be addressed and develop a more proactive MOAP for 2026 to 2035, leaving as a minimum the existing outputs and adding new outputs as appropriate.

APPENDIX

Table 1. Summary of activities undertaken and elements to consider under the specific objectives of MOAP 2016-2024, for framing the MOAP 2026-2035

Mediterranean Offshore Action Plan – 2016-2024	Summary of activities undertaken and elements to consider under the specific objectives of MOAP 2016-2024, for framing the MOAP 2026-2035
<i>Section II.2 of the MOAP-. Specific Objectives</i>	
Specific objective 1: To ratify the Offshore Protocol	<ul style="list-style-type: none"> <input type="checkbox"/> No new ratifications have taken place since 2018. Only one ratification took place during the implementation period of the MOAP 2016-2024. This remains an on-going challenge (REMPEC CL No 06/2024 refers).
Specific objective 2: To designate Contracting Parties' Representatives to participate to the regional governing bodies	<ul style="list-style-type: none"> <input type="checkbox"/> Four Meetings of the OFOG have been organized and a fifth one is budgeted for and scheduled to take place. <input type="checkbox"/> Meetings of the OFOG Sub-Group on Environmental Impacts have been organized with funds provided by the MTF. <input type="checkbox"/> The attendance at the Meetings of the OFOG and the training activities, is half the number of the CPs to the Barcelona Convention. <input type="checkbox"/> No Meetings of the OFOG Sub-Group on health and safety have been organized. <input type="checkbox"/> When considering the diverse outputs in the present MOAP, an issue that needs considering is who coordinates and leads the work in the CPs originating from the two different Sub-Groups notwithstanding that Focal Points might have been designated. Availability of the necessary expertise and qualification to effectively lead the expected tasks should be ensured <input type="checkbox"/> The issue of securing a fixed-term position in the existing MAP institutional arrangements dedicated to the Offshore Protocol implementation has been raised numerous times as there is a need to follow-up on progress made both by the Secretariat and CPs on the implementation of MOAP including oversight on the expected outputs. The need for a secured position was reiterated at the 3rd and 4th Meeting of the OFOG (2021 and 2023). <input type="checkbox"/> One CP has led an Intersessional Correspondence Group (3 ICGs have been established) but has not completed the work in its entirety and has subsequently handed the work over to the Secretariat to follow-up and complete.
Specific objective 3: To establish a technical cooperation and capacity building programme	<ul style="list-style-type: none"> <input type="checkbox"/> Many of the SOs and their associated outputs are inter-related and have a bearing on each other so many of the elements raised above apply throughout. In terms of governance (Part II.2.1 of the MOAP) and in relation to technical cooperation and capacity building programme, the identification and dependence of donors to provide funds required for the implementation of the technical cooperation and capacity building programme (Part II.2.1 SO 3 c)) has proven to be difficult. This is most likely for two reasons: <ul style="list-style-type: none"> 1) Oil and gas activities are considered to be driven by the industry, and one might expect it to be a main financial donor for capacity building. Whilst it might be ready to provide its expertise to capacity building activities, at the same time this

	<p>industry, in particular some of the multi-national companies, has regulations in place which does not allow it to directly fund governmental staff attend such activities. Hence funding from industry is very targeted.</p> <p>2) The absence of a permanent member of staff who can identify funds to support the programme and build relationships with potential funding mechanisms.</p>
Specific objective 4: To mobilise resources for the implementation of the Action Plan	<ul style="list-style-type: none"> <input type="checkbox"/> SO 4 is aimed at mobilizing resources for the implementation of the Action Plan. The issue of a lack of a dedicated staff member to oversee the implementation of the OP again applies here too. In this context, at the moment, there is no staff responsible who can keep regular contact with the various stakeholders to plan and prepare for the mobilization of resources. <input type="checkbox"/> the Meetings of the OFOG Sub-Group on EI were organized with funding from the MTF, which is not adhering to Decision IG. 21/18 of COP 18.
Specific objective 5: To promote access to information and public participation in decision-making	<ul style="list-style-type: none"> <input type="checkbox"/> SO 5 requires reporting and publishing information. This issue of the lack of a dedicated staff member to oversee the implementation of the OP again applies here too. In this context, at the moment, there is no staff responsible who gathers the information and proposing the material for the promotion. This also applies for example, on who should upload the information on a dedicated website. In this context, INFO-RAC has a role to play. However, without providing the material, little can be achieved by this RAC alone
Specific objective 6: To enhance the regional transfer of technology	<ul style="list-style-type: none"> <input type="checkbox"/> SO 6 aims at collecting and disseminating information, This issue of the lack of a dedicated staff member to oversee the implementation of the OP again applies here too. In this context, at the moment, there is no staff responsible who should compile an inventory of R&D activities and disseminate them.
Specific objective 7: To develop and adopt regional offshore standards	<ul style="list-style-type: none"> <input type="checkbox"/> Three Offshore Guidelines and Standards have been adopted and a fourth one is expected by the end of this current biennium, out of a planned eight. <input type="checkbox"/> Two training activities have been organized over the 10 years implementation period of the MOAP 2016 and 2024. One was organized online, and one was organized face-to-face. 38 representatives from the CPs have been trained.
Specific objective 8: To develop and adopt regional offshore guidelines	
Specific objective 9: To establish regional offshore monitoring procedures and programmes	<ul style="list-style-type: none"> <input type="checkbox"/> Achievements are due to the work being carried under the IMAP and in particular, the approval of 5 Common Indicators to be monitored at the 4th Meeting of the OFOG (adopted at COP 23).
Specific objective 10: To report on the implementation of the Action Plan	<ul style="list-style-type: none"> <input type="checkbox"/> The issue arises as what is expected to be achieved under SO 10 and how can this be done in a measurable way. This raises the question on whether a set of indicators are developed as reference to monitor implementation.