

Public Notice
Re-Affirming the BZU Study on Environmental and Health Impacts of HBAP in Birzeit Town

The EIA study submitted by the investor did not comply with the minimum requirements of the terms of reference (ToR) set by the Environmental Quality Authority (EQA). The BZU study has provided the scientific arguments against setting up the HBAP plant in Birzeit town as follows:

[1] Quality of the EIA Study

Scoping Session:

- Unsatisfactory site selection with lacking coverage of site alternatives as per EQA ToR.
- Erratic and incomplete baseline data during scoping session on current environmental status.
- Inadequate and insufficient engagement of affected parties with no conflict solving tools.

Identification and Analysis of Environmental, Socio-cultural and Economic Aspects:

- Unsatisfactory and lack of science-based methods for impact prediction and analysis.
- The Birzeit industrial area experienced land use changes over the past 30 years. Land use changes have resulted in the destruction of olive trees during the erection of existing factories including HBAP land parcel. The EIA provided general site description with limited spatial coverage.
- Assessment and analysis of temporal and spatial emissions for airborne hazardous pollutants, odour and noise are not covered.

Environmental Management Plan [EMP]:

- Inadequate and insufficient mitigation measures for pollution prevention, reduction and treatment.
- Lack of precise methods and tools for real pro-active monitoring of environmental impacts during normal operation and emergency conditions.

Conclusion: Considering the non-compliance of the investor's EIA study for the HBAP, it did not provide sufficient information for an informed and science-based decision making.

[2] HBAP – Declared by investor as environmentally friendly factory

- The HBAF is in close proximity [less than 150 meters] from existing industrial factories including ready-made concrete plant, stone and marble factory, brick factory, poultry slaughterhouse and diverse car repair workshops. The erection of HBAP, a new heavy industrial factory, will cause additional annual pollution loads posing cumulative and most likely irreversible health and environmental risks.
- Despite being declared as an eco-friendly HBAP with modern control and monitoring systems for unit operations, the SCREEN3 v.4 of the US EPA revealed a safe setback distance between 2.063km¹ and 3.60km² from the nearest residential area. However, the HBAP is only 150 meters away from the nearest residential home.
- Public mistrust and challenges facing the EQA in follow-up and monitoring its efforts in enforcing legal and environmental by-laws reinforce our arguments against the HBAP being built in its current location, and that the HBAP exerts real potential health and environmental hazards at the short and long-term levels.
- The BZU committee upholds sustainable economic development in Palestinian communities, and asphalt production through innovative and advanced production techniques, **BUT NOT** in Birzeit Town or other areas where health and environmental risks of damage are high.

Conclusion: Regardless of how environmentally friendly the HBAP is, the lack of a safe setback distance [2.063-3.60 km] to nearby located residential areas is NOT suitable to construct in the suggested site in Birzeit Town.

Members of Birzeit University Committee, who prepared the study:

Dr. Maysaa Nemer, Institute of Community and Public Health
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¹ The setback distance of up to 2.063km, which was described in the BZU addendum, for air dispersion based on least bad scenario for estimated annual pollution loads from ducted pollution sources [chimney], including flue gas temperature, the diameter of chimney and its height as per the technical specifications found in EIA Annex.

² The setback distance of up to 3.6km, which was described in the BZU study, for air dispersion based on estimations of annual pollution loads adding fugitive pollution sources from adjacent industrial factories, including assumptions made on flue gas temperature, the diameter of chimney and its height. The latter may vary with final and actual technical specifications for the drying drum and chimney.

