

Comments on PA 03347/16 “Proposed construction of petrol station and auto repair and maintenance centre instead of an existing open storage yard” 23 February 2018

As a reaction on the EIA Report of the proposed development PA 03347/16 “Proposed construction of petrol station and auto repair and maintenance centre instead of an existing open storage yard” in Mqabba, BirdLife Malta would like to submit the following comments:

- No alternative site has been considered. This contradicts with the Environmental Impact Assessment Regulations (S.L.549.46), 2017, that states in paragraph 13. “Wherever relevant, projects that fall within the scope of these regulations shall require a sufficiently detailed and reasonably exhaustive initial appraisal of potentially suitable alternatives, on the basis of their technical merits, feasibility, and environmental implications and impacts, in the interest of streamlining and optimizing the subsequent assessment process.”
- The EIA report highlights that 11 Aleppo Pine trees will be permanently removed. Since the proposed development is located within ODZ, removing these trees is in breach of the Trees and Woodlands Protection Regulations, 2011, stating in Schedule II that Aleppo Pine trees are protected within ODZ. Consequences of removing the trees include among others loss of biodiversity in the Maltese islands. The EIA report does not propose mitigation measures.

Furthermore to the above comments, BirdLife Malta questions the justification for this proposed development since there are at least three petrol and service station located in close distance, one about 1.5 km and two in a distance of about 2 km (see map). Although aware that this is not in breach of national policy, the development is not justified in BirdLife Malta’s opinion.

