



Comments on PDS of the Malta-Gozo Tunnel for consideration of EIA Terms of Reference

August 2018

BirdLife Malta has reviewed the Project Description Statement (PDS) for the proposed development of the Malta-Gozo Tunnel. Based on the information provided on the ERA website for the public consultation, we understand the proposed development can have some concerning environmental impacts that require to be assessed.

The PDS does not provide a detailed description of the proposed development, and it implies there are various options and configurations to be considered. **A more detailed description of the option/configuration that Transport Malta wishes to pursue, should aid a better assessment of the environmental impacts, and the available alternatives. Such details are required prior to conducting an EIA on the proposed development, following an assessment of options available and the identification of the option that has the least environmental impact.**

Based on the general information provided in the PDS, we recommend the below points to be considered as part of the Terms of References for the EIA.

a) Screening for a Strategic Environment Assessment

Given that the project will extend or join two areas of Malta's transport network, the proposed development should qualify for a Strategic Environmental Assessment (SEA). This is especially due to the fact that the proposed development could set the framework for future development consent of projects listed in the EIA Directive, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) reflected in Strategic Environmental Assessment Regulations, 2010 (Legal Notice 497 of 2010) determines that an SEA is mandatory for plans/programmes which have been determined to require an assessment under the Habitats Directive.

We would like to highlight that an SEA requires the environmental authorities to be consulted at the screening stage and views of stakeholders and the public need to be consulted in an early stage. The PDS does not highlight that such screening has been carried out by the competent authority, and ERA should ascertain this is carried out.

b) Social Impact Assessment

The PDS refers to Transport Malta having commissioned a social impact assessment with a survey indicating a majority of Gozitan residents in favour of the link. This document should be made public for public consumption. Any social impact assessment should not singlehandedly value the opinion of Gozitan residents, but also gauge the perception of the general Maltese public, given the link is a project which



will impact the whole country. The same applies for the Mott MacDonald study carried out in 2012 to which the PDS is referring to at various sections.

c) Impacts on Natura 2000 sites

As stated in the PDS, option one and two are dismissed from the proposal due to their negative impact on the Għadira Nature Reserve, especially during the construction stages of the project. The tunnel should be kept as far distant as possible from the Natura 2000 site. As a matter of fact, preferred option four is nonetheless located in close distance to Simar Nature Reserve, which is another important Natura 2000 site in Malta.

On the same account, the preferred route is crossing through the groundwater safeguard of Miżieb and thereby risks having a severe and irreversible impact on the groundwater aquifer. Along the same route, the tunnel furthermore crosses underneath several nature protection sites, including:

- Għadira Nature Reserve that forms a fully protected bird sanctuary and a Special Area of Conservation within the EU Natura 2000 network with restored lake and saltmarsh habitat
- Il-Baħar ta' madwar Ghawdex Special Protection Area (SPA) hosting among others seabird colonies of Puffinus yelkouan
- Żona fil-Baħar bejn il-Ponta ta' San Dimitri Special Area of Conservation (SAC) hosting Posidonia beds, sandbanks, loggerhead turtle and the bottlenose dolphin.

The PDS points out that “no particular effects on the seabed are envisaged during both the construction and operation phases”, however, given the nature of the project the tunnel will be buried into the sediments of the seabed. It is true that for instance soft benthic communities that can be found on the seabed will recover in a shorter period (within two years), however, it cannot be excluded that the project is likely to have an impact on the hard substrate of the seabed. The re-colonization process of species located underneath the seabed can take up to ten years, thereby the impact can be more severe than currently expected. The number of species affected increases with depth of the installation as well as drop of temperature.

Appropriate Assessments for these Natura 2000 sites and the species they are designated for, should be fully pursued by ERA in order to evaluate and ascertain possible impacts.

d) Impacts during the construction phase of development

The EIA needs to identify the approaches of developing best possible planning and environmentally friendly construction and management procedures as well as environmental monitoring programmes throughout the period of the entire project to minimize potential impacts during construction of the tunnel to address the above concerns holistically and fully. This especially applies given that the planned route is crossing underneath the above-mentioned protected sites.

The project envisages 3 years of excavation works generating over 1 million cubic metres of rock waste. The impact assessment should fully assess the capability of Malta's infrastructure to deal with such a huge volume of waste, including the transport routes where such waste will be carried through, and where it will eventually be deposited. This should be considered in the light of the current problem where there are no extant quarries ready to receive inert construction waste. There will be possibly no capacity to housing the



huge volume of rock waste the tunnel excavations will generate. Such a project will result into speculation into the marine environment possibly giving leeway for land reclamation projects which will be detrimental to marine habitats and environment.

During construction the development shall also require the consumption of copious volumes of water, and consequently generate similar volumes of waste water containing sludge and other excavation byproducts. The location of the tunnel opening to valleys systems in Gozo and Malta such as Pwales should be fully evaluated, as any runoff will invariably impact the sensitive nature of watercourses as well as Natura 2000 sites which depend on water flows including is-Simar.

The possibility of runoffs to end up in nearby beaches and the coast should also be fully evaluated, and the impact these would cause to coastal and marine habitats.

It is understood that 3 years of tunnel excavations will also generate considerable vibrations underground, effecting sensitive natural sea caves, tunnels and burrows, including those where seabird colonies reside in the various sensitive areas around the development. The impact of vibrations would possibly be felt by seabird colonies as far as Ta' Cenc, Comino and Rdum tal-Madonna – and this needs to be fully evaluated. Risks of collapse of cliff faces and sea caves needs to be also properly ascertained.

The PDS also mentions the possibility that tunnel excavations will alter or impact the mean sea level aquifer which is a vital source of groundwater for many localities. The impact on this vital source should be fully evaluated with regards to all aquifers in the north of Malta, Comino and Gozo. Risks identified in the PDS include a shift in the levels of such aquifers which would have serious consequences on the availability of water to human and natural assets.

e) Impacts during the operational phase of the development

As a result of the proposed development it is estimated that the traffic flow between Gozo and Malta will increase to up to 9,000 cars daily passing through the tunnel. The traffic increase will inevitably negatively affect the reserve as well as the surrounding area by noise, light and vibration pollution due to passing-by vehicles. The EIA needs to consider the estimated traffic increase of 6,000 to 7,000 vehicles daily passing by the buffer zone of the reserve through the Pwales Valley.

Given this traffic flow will also affect the infrastructure in Gozo, a SEA approach needs to be undertaken and evaluated in order to fully gauge the cumulative and resulting impacts this development will cause.

The PDS is unclear whether ventilation within the tunnel will need interventions such as chimney holes exiting above the sea level surface. A full description of such areas need to be provided, locations need to be identified and their impacts evaluated, given the possibility these will severely impact through construction, as well as resulting impoverished air quality, areas such as Comino Natura 2000 site.

The EIA should also delve into the strategic planning the islands have been subjected to over the years, which have ensured infrastructure demands to be upgraded or are in the pipeline of being upgraded in the the North of Malta. Should the tunnel be constructed, the need for such infrastructure which will also impact several N2K sites, should be reevaluated. The EIA should explore these venues in order to provide a full assessment of the pros and cons of such a development.