



BirdLife Malta objects to Planning Application PA/07028/18 Resurfacing of existing road and extension of existing pier at Site at, Blue Lagoon off, Comino, due to the following reasons:

The development is likely to cause increased light and noise disturbance to the area that is located within the Marine Protected Area Il-Bahar ta' madwar Ghawdex. The development is not directly connected with or necessary to the management of the site but likely to have a significant effect on the priority species the site has been designated for, hence it qualifies for an Appropriate Assessment in view of the site's conservation objectives. By creating berthing opportunities for leisure boat cruises, floating discos, private yachts and other boats in close distance to important colonies of Yelkouan Shearwater and Scopoli's Shearwater, the development poses threats of light and noise pollution to these colonies.¹

The vessels often get close to coastal cliffs and enter sea caves where Yelkouan shearwaters nest, producing sound disturbance during the day, sound and light disturbances at night, and potentially olfactory disturbance with their fumes. This disturbance increases the stress on nesting birds and could lead to a reduction in reproductive success and even nest abandonment. Furthermore, boat operators and private boat owners may be unaware of the disturbance they cause to birds at sea, by driving their vessels too close to congregations of rafting birds in front of the breeding colonies in the evening.

With reference to the Comino Natura 2000 Management Plan, a stakeholder consultation concluded that it is recommended for boats should stay outside the Lagoon completely (p.7). The same management plan points out degrading features on Comino include concrete berthing areas. Building a concrete road is furthermore increasing the possibility to install a concrete road system on Comino which leads to further degradation of present ecosystems.

The current state of several – partly illegal - concrete jetties on Comino is not favourable, however, proposing an extension of the existing pier is not a favourable solution either in the absence of an actual implementation of a management plan for Comino Natura 2000 and in the absence of a management plan for the Bahar ta' madwar Ghawdex Marine SPA. Improved berthing facilities without proper management will accentuate the problem at Blue Lagoon which is currently estimated to be over 5,000 visitors a day during the peak of summer.

The development is therefore likely to increase the problematic situation further if not embedded into a broader strategy to decrease boat traffic in the area or manage visitor traffic. It needs to be clarified whether the proposed development is an additional development to the berthing places currently available at Blue Lagoon or if it will replace the current berthing places in the Lagoon.

As part of the LIFE Arcipelagu Garnija Project, in which BirdLife Malta and Transport Malta are partners, we are proposing a Notice to Mariners in Blue Lagoon area to avoid disturbance to nesting birds on the following parameters:

1. Control and limit the number of boats accessing the area and the number of boats that may be present at any one time. This could be controlled by Transport Malta with a camera situated on

¹ Lago, P., Metzger, B., Austad, M., Crymble, J., Barbara, N. (2018). An assessment of boat-based disturbances to Yelkouan Shearwater colonies in Malta and proposals of how to reduce it. LIFE Arcipelagu Garnija (LIFE14 NAT/MT/991) Action C3 report. BirdLife Malta.



top of the toilets of Blue Lagoon similar to other locations in Malta. We feel that Transport Malta needs to establish a threshold or carrying capacity for Blue Lagoon in order to minimize risk of accidents and disturbances.

2. Limit the number of boat parties in Blue Lagoon and introduce a limitation in the decibels level they can produce.
3. Forbid maritime activities that contribute to noise disturbance such as floating toboggans or floating platforms, particularly platforms to rent JetSkis or other vessels.
4. Forbid non- compulsory lights while anchoring at night out of Blue Lagoon in the outer part of Cominotto in the south cliffs to reduce light pollution on the Cominotto colony

We agree with ERA's take on the proposed development that prior to any further consideration a Project Description Statement needs to be produced, and this subjected to screening for an EIA and AA. In the absence of such an analysis of the potential impacts during the construction and operational phases of this development, BirdLife Malta objects to this development.