

**To whom it may concern:**

BirdLife Malta has seen the details and plans pertaining to PA 4833/20 which is proposing a demountable pier structure at Comino Blue Lagoon including the removal of existing makeshift concrete walkways to restore the original shoreline.

While we understand that in principle this application shall help Transport Malta achieve a safer berthing of vessels at Blue Lagoon, and will possibly also reduce trampling on various coastal habitats in the adjacent coastline, we would like to bring to the attention the following considerations to be made:

- a. The pier shall result in possibly an increased number of visitors/traffic to an already clogged area which suffers immensely from a lack of visitor management to Comino Island. A carrying capacity for the island of Comino should be implemented (as recommended in ERA's management plan) and any means of improving access to the island should be in line with improving the tourism product in a sustainable manner, but not increasing the volume of visitors to this already impacted Natura 2000 site. The size, orientation and capacity of the pier should be regulated accordingly.
- b. The activities associated with this pier and the development area are situated within a Marine Natura 2000 site (MT0000112 Il-Baħar ta' Madwar Għawdex), and are allowing access to Comino Natura 2000 site. Accordingly the development application should be subject to an Appropriate Assessment which should delve into the detail of both constructional and operational phases of the development and any impacts brought about by visitors to the area. Such impacts shall depend on the permitted activities and timings that the pier shall be used for, so it is adamant that a list of permitted/unpermitted activities is established in line with the management plan for the N2K site.
- c. The construction and operational phases of the development should especially consider the highly sensitive breeding colonies of Yelkouan Shearwater which nest on Cominotto, and which are subjected to a great deal of human-induced pressures and threats as a result of the concentrated human activity at Blue Lagoon. Considerations should include the pier, and its construction, as a source of light and noise pollution which could be mitigated through construction/dismantling happening at non-sensitive periods (outside sensitive breeding periods), and by establishing some form of baseline which should not be exceeded. The pier should introduce new light sources to the area, or even be the means by which noise and light pollution become a mainstay – such as through regular boat parties during sensitive periods, or through unregulated overnight stay of vessels.

- d. The pier and any other facilities which cater for the transportation of people to and off Comino should also have full regard to the biosecurity needs of the island as demanded by the proper management of this Natura 2000 site. Waste collection facilities at the pier and around it should be appropriately provided and managed (to avoid food availability for rodents during nighttime). The pier should also be managed in terms of rodent management as well as a possible source of incursion of rodents from sea vessels. All vessels berthing to the proposed pier should have an established biosecurity procedure which does not allow for the possible transportation of any alien invasive species to the island.

While trusting the above can be duly considered by Transport Malta, the Planning Authority and the Environment and Resources Authority, BirdLife Malta reserves its right to reformulate its response and opinion on this planning application subject to the completed environmental impact studies being publicized and shared with adequate mitigation and management measures in place.

For further information: [info@birdlifemalta.org](mailto:info@birdlifemalta.org)