



BirdLife Malta's comments on Public Consultation for the EIA report for the proposal of the construction of the Malta-Italy gas pipeline EU Project of Common Interest

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BirdLife Malta has reviewed the documents regarding the EIA for the Malta-Italy Gas pipeline interconnection presented by the Italian side, and would like to share our comments.

Firstly, the route of the gas pipeline does not avoid sensitive protected areas and buffer zones. The onshore part of the project is falling within the boundaries of the two Natura 2000 sites: SPA *Torre Manfria, Biviere e Piana di Gela* (ITA050012) and the area of *Biviere e Macconi di Gela* (ITA050001) protected under the Habitats Directive, as well as the wetland of international importance protected under the Ramsar Convention. In this regard, no significant mitigation measures have been proposed to lower the adverse impact on local and migratory bird species (particularly, *Neophron percnopterus*; *Calonectris diomedea*; *Anas querquedula*; *Aythya nyroca*; *Tringa glareola*) which may be created during the construction phase of the project. The Non-Technical Summary mentions the occupation of land and habitat removal as the main environmental impacts on present fauna, however noise and vibration (during clearing, ditch digging, drilling, blasting, pipe handling, vehicle movements, etc.) are not taken into thorough consideration, and the negative impact of the last on the migratory and local avifauna should be analysed further with the idea to offer feasible mitigation measures (such as choosing the proper timing for the drilling and excavation works depending on the migratory season dynamics). Light pollution mitigation onshore has not been mentioned in the Non-Technical Summary as well, which is a significant gap especially taken into account the presence of Scopoli's Shearwaters who nest on the coast of Gela and are sensitive to glare and other types of light pollution. It should be stated that the operations during breeding periods of seabirds should be avoided.

The mitigation measures in relation to air pollution, namely NO_x emissions, are almost not covered in the EIA, although at the same time it outlines that "exceedances of the threshold value in terms of hourly percentiles (maximum hourly average concentration values) are possible". We would like to stress that NO₂ is a toxic gas, even at relatively low concentrations, while NO_x contributes to the formation of acidic species which in turn may have negative effects on both freshwater and terrestrial ecosystems. In this view, the proper mitigation measures should be introduced to reduce the NO_x emissions as much as possible.

When it comes to the environmental impact assessment of the project-related activities offshore, the summary doesn't analyse comprehensively the possible negative effects, especially in terms of light pollution, on marine birds (particularly, the European Storm-petrel and the Yelkouan Shearwater) who actively use the waters of the Malta Channel for foraging. The analysis of impact and the introduction of relevant mitigation measures are vital to keep the seabirds and other marine animals safe. We strongly suggest considering the following:

- during the construction phase as well as operational phase (maintenance or repair works), the operating of the vessels at night time should be avoided when possible;
- all lighting not required for the safe navigation of vessels should be full cut-off, downward facing, of appropriate intensity and colour temperature, and distribute light appropriately such that light spill on the marine environment is minimized.

We also would like to highlight that according to the European Green Deal, the EU is set to reach climate/carbon neutrality by 2050. When it comes to energy, the Legislative framework chapter of the Summary is missing this most up-to-date piece of legislation. In this context, we also suggest that the possibility to switch from LNG to hydrogen (as a carbon neutral option) transportation in future may be assessed with the idea to get in line with the EU long-term GHG emission reduction targets.

Overall, we can state that the project will have a significant negative impact on the ecosystems, both marine and coastal, specifically due to:

- physical damage to the seabed (including increase in water turbidity, release of nutrients and hazardous substances and impacts on bottom currents);
- discovery of dumped munitions and barrels which need to be removed (including leakage, poisoning in the area);
- munitions clearance of dumped munitions which can cause severe sediment disturbance in the process of removal;
- heavy vehicles emissions, noise, vibration and light pollution;
- potential oil spills during the construction phase offshore;
- foreseen adverse impact on the mentioned Natura2000 sites and the surface water system, etc.

Viable mitigation measures to cover the mentioned impacts are highly needed. However, understanding that some of the impacts are inevitable and also realising the transboundary effect of these impacts, we recommend considering such a compensatory mitigation measure as granting further protection to certain affected areas, widening the Natura 2000 network (including at sea), and contributing to the restoration of damaged ecosystems.