



Recommendations on the Terms of Reference (TORs)
for the EIA for the PA 08471/19 & PA 04783/20 Grand Harbour Wave Climate
02 September 2021

BirdLife Malta has reviewed the documents presented for the public consultation with regard to the Construction of a berm and revetment including dredging at Valletta Grand Harbour & Construction of new Breakwater arm beneath St. Elmo to offer protection to the Grand Harbour during North Westerly storms, and would like to provide our suggestions to be considered for the Terms of Reference.

Firstly, we would like to emphasize that the Grand Harbour Local Plan identifies St Elmo Point as a Site of Scientific Importance (Geology) and an Area of Ecological Importance. The area of Grand Harbour overall is an Area of High Landscape Value, while Valletta is listed as a UNESCO World Heritage Site and all of it, including the waterfront zones, is designated as an Urban Conservation Area. The Local Plan also states that in the areas indicated as Valleys, Areas of Ecological / Geological Importance and Sites of Scientific Importance, “development of any description which could prejudice the unique natural characteristics of the areas or adversely affect individual sites will not be permitted”. Taking into account all mentioned, a thorough Environmental Impact Assessment should be undertaken which shall include the following considerations:

- during both the construction and operation phases, the project is expected to contribute substantially to the light pollution in the area. The impact of an additional source of light in the area which is already heavily polluted needs to be closely analysed, and feasible mitigation measures should be offered to minimise an adverse impact on biodiversity;
- as it is said in the PDS, all works will be carried out from the marine side, which means the involvement of heavy vehicles, like barges. In this case, there is a risk of oil spill, increase in turbidity and contamination of the surface water;
- the impact on water quality should be evaluated as well, specifically the contamination of water during excavation due to the release of hazardous substances, like Mercury and PAHs presence of which on the site is mentioned in the PDS;
- the project will generate a significant amount of waste - about 17,000m³ of excavated rocks and other waste which will be dumped offshore. Considering the presence of contaminants found on the site, as well as the volume of waste, there is a need to work out a proper waste Management Plan and relevant mitigation measures;



- a proper assessment of noise and vibration generated during the construction phase should be included into the EIA;
- given the nature of the project, the assessment of environmental impacts associated with the waves hydrodynamics should be undertaken;
- the construction phase of the project will include the excavation and dredging of a seabed (about 14,000 m³), therefore the assessment of the impact on geomorphology shall be carried out;
- the impact on the disturbed marine habitat, including marine flora and fauna species present on site must be assessed, given that the site hosts a rich benthic community.