



Comments in relation to screening exercise for the laying out of terms of reference for an environment impact assessment in relation to the redevelopment of the Comino Hotel at San Niklaw and Santa Marija Bays, Comino

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BirdLife Malta has reviewed the Project Description Statement (PDS) published February 2021, and attended the public consultation meeting held in March 2021 which provided an insight to the proposed redevelopment of the ex-Comino hotel at San Niklaw and Santa Marija Bays on Comino. The island of Comino is somewhat one of the last remote and less urbanized parts of the Maltese Islands, and gains from various degrees of protection ranging from Natura 2000 designations for the islands and its ancillary islets, as well as its surrounding waters. Regardless, the island has in recent years suffered immensely under unsustainable visitor pressure, mostly in the form of excessive tourism figures in the summer months impacting the most attractive parts of the islands, and bringing with them transportation-based disturbance, illegal camping and settlement, inappropriate waste management practices and the introduction of alien species, amongst other human-induced impacts to what should be a Natura 2000 site.

On the other hand, the current inactivity of the hotel area and the onslaught of the pandemic have left the island less disturbed over the past months, and along with actions such as the removal of the informal camp-site at Santa Marija Bay, ongoing afforestation actions on the island, and a general less intense human presence have shown potential for restoration which is exhibited through interesting bird breeding records on the island and regenerating habitats in selected areas. As has been witnessed up until recently, the island is still vulnerable to abuse, at times from government institutions themselves, driven by the still alluring economic and touristic interest and potential of the island.

A proper environment impact assessment exercise, if undertaken diligently and with a full understanding of the pressures and threats faced by the island, with a view of lessening these rather than accentuating them could result in a development which is more sensitive to the unique setting this development is sited within. Comino is home to internationally important populations of nesting seabirds, namely Yelkouan and Scopoli's Shearwaters, while its bird sanctuary status offers refuge to other nesting birds including other Annex 1 species such as the Short-toed Lark and the Short-eared Owl. The island hosts a plethora of habitats and maintaining the integrity of the ecosystems on the island is crucial to getting this Natura 2000 site to a favourable conservation status.



Following our review of the proposed development as described in the PDS, our recommendations for the EIA is to evaluate fully the potential and cumulative impacts on the following aspects which directly and indirectly may have an effect on the ecology of the island:

a. Amenity value of the area: Comino is heavily pressured by unsustainable tourism figures during the summer months. While it may appear that the hotel will have a reduction in guest rooms compared to the current setup, the amount of villas proposed for Santa Marija Bay exceeds the current setup and will likely result in a greater influx of visitors to the complex than what the complex has seen or supported in past years. The PDS does not seem to point out any estimated occupancy figures which would have been surely calculated by the investors in this initiative to make the project economically viable. The EIA should delve fully in the projected figures, with consultation with entities such as Ambjent Malta (AM), the Environment and Resources Authority (ERA) and the Malta Tourism Authority (MTA), on whether the proposed use for the area is within the carrying capacity of the island. The scale of impacts from the proposed development such as waste generation, energy consumption, transportation, light and noise pollution, etc are directly dependent on the projected number of visitors this development will be aiming to cater for.

In relation to the above, we foresee the following impacts that need to be addressed by the EIA:

b. Visual impact and light pollution: The PDS suggests that overall the development may increase in height, and therefore its siting within the landscape and its visual influence may be exerted over a larger expanse on the island and adjacent Natura 2000 sites than the current occupied volume of the hotel. Entertainment areas such as the mentioned 'village piazzas' are bound to be entertainment sources which will be probably lit up during the night. Lighting installations at sections such as the proposed open staircases and glass lifts, while possibly aesthetically pleasing, need to also be considered in terms of these becoming point sources of light at night. Comino island is home to a number of species which are sensitive to light pollution – these include nesting seabirds and other fauna. The EIA should therefore anticipate fully the visual impact and light pollution of the development during its construction and operational phases such as these do not exert any influence to sensitive receptors. These include areas in close proximity to the development such as shearwater colonies at Santa Marija caves, to seabird colonies further afar that utilize the marine SPA as well as nest at colonies as far as Ta' Cenc cliffs. Light pollution impact should also extend to any lit pathways connecting San Niklaw and Santa Marija developments.

c. Noise and vibrations: Similarly to the above, the various interventions on site which will see significant demolition, movements of heavy machinery, rock cutting, etc. are bound to cause noise and vibrations which might affect nesting seabirds in the area, especially if these are carried out during sensitive breeding periods. Such vibration/noise concerns are not only relevant to seabird colonies but also extend to other ground nesting birds on Comino such as the Short-toed Lark and Short-eared Owl for which Comino provides a safe habitat for such Annex I birds.

d. Construction waste: The development shall generate a substantial amount of construction waste which may need to be transported to be utilized or disposed elsewhere. While reutilization on



site, especially on unutilized scars in the area (such as the mentioned tennis and volleyball courts) may help re-pristiniate the general morphology of the hotel sites, the end destination of disposed construction material needs to be identified at EIA stage. Comino cannot afford to have further construction waste scars inflicted, and neither should the availability of such material incentivize further speculation of the Natura 2000 site such as the constructions of quays, roads and similar undeserving infrastructure.

e. Domestic waste: Waste management at Comino, or rather its absence, is one aspect which indirectly effects the favourable conservation status of a number of species on the islands from flora to fauna such as nesting seabirds. Mismanagement of waste has sustained a healthy rodent population on the island for years impacting nesting success on the island, and to a certain extent has also affected the general landscape and regeneration potential of flora. The issue of domestic waste should be given importance throughout all phases of the development, including both construction and operational phases, and how this shall be tackled and managed effectively. Accumulation of waste during night time is to be avoided at all stages.

f. Wastewater treatment: It is likely the development shall re-utilise the extant wastewater treatment plant situated at Santa Marija Bay. The PDS however lacks any details on the proposed wastewater treatment strategy in detail. If such is the case, the impact to be exerted from the re-utilisation of this site needs to be fully assessed, especially with respect to the sensitive positioning of this plant at Wied l-Ahmar, with sensitive marsh-land and sand-dune habitats down-stream of such a plant. Any construction, outflow, noise, vibration, lights, etc may have a direct impacts on these habitats which are being slowly regenerated since ERA has clamped on the illegal use of the area as a campsite. The potential to integrate the use of treated water to compensate and aid restoration works should be also considered.

Wastewater impacts should also be assessed at construction phase of the development, considering that an estimated 150 workers might be operational on site during this phase. The EIA should fully delve into what sanitary services shall be provided at this phase and how these shall be managed.

g. Land transportation and routes: The proposed development is divided between Santa Marija and San Niklaw Bays which are linked via a footpath, as well as a makeshift dust road linking the two. The hotel is also proposing to have mechanized transport linking the two areas of the hotel. Over past years, the continuous passage of poorly kept vehicles throughout these roads have been a continued source of dust emissions to adjacent habitats as well as erosion and deviation of surface runoff. The associated impacts which such activities need to be fully addressed in the EIA, including whether the development shall propose any more sustainable modes of transport. Full consideration should be made on the feasibility of surfacing frequently used access routes during the operational phase of the hotel, possibly ensuring surface runoff is utilized, treated or channeled appropriately such as the road network does not continue to impact any adjacent habitats. Needless to mention, the movement of materials and machinery during the construction phase of the project need to be also fully assessed in terms of their impact on this Natura 2000 site.



h. Use of imported materials including landscaping: While the use of natural local stone to be integrated in this development is commendable, the importation of various materials on the island, including from stone sources in other parts of the country or outside Malta needs to be fully assessed for the possible introduction of alien species indirectly. Transportation of soil and landscaping materials, including plants, can result in the involuntary introduction of species on the island which may have a damaging effecting on ecosystems. This may include transportation of diseases, seeds, fauna, eggs as well as possibly genetic variants of locally established species, which might compromise Comino's flora and fauna. Any proposals to integrate landscape should identify at EIA stage the sources of where such materials will be sourced, and the possibility of in-situ propagation should be considered if covered by relevant nature permits and scrutiny by ERA.

i. Renewable energy sources: While the development is being aimed to eventually achieve a carbon neutral status, the installation of a solar panel farm on the island has been mentioned during consultation meetings. While the re-utilisation of areas such as the abandoned pig-farm might be possible, such intentions by the developer should be made clear, and any ancillary developments beyond the land concessions to the hotel need to be scrutinized accordingly for their impact on Comino away from the hotel site. While carbon neutral operation of the hotel would be a commendable approach, the positioning of a solar farm on the island might not be commensurate with the management of the island to achieve a re-pristination of its habitats. The EIA should delve into all possible alternative of siting such a solar farm, including its positioning off Comino so as not to impinge on the visual, ecological and restoration potential of the island.

j. Electrical substation: Similar to the above, should the development require an upgrade in electrical supply to the island, the associated impacts with upgrading the existing substation and any necessary ducting that might be accompanied with such an upgrade need to be fully assessed as part and parcel of this development.

Having made our recommendations, BirdLife Malta reserves its right to make further comments, recommendations, and observations during the EIA process of such a development, while reserving its position on the actual development once the impacts of the development are fully investigated and assessed diligently.