



BirdLife Malta's comments on EIA report for the PA 02943/19,  
Ramla Bay Resort redevelopment, Marfa, Mellieha  
19 October 2021

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As part of an ongoing public consultation on the EIA report for the PA 02943/19 at the Ramla Bay Resort, in Marfa, Mellieha, we have reviewed the provided documents and would like to provide the following comments.

We have noted that the Appropriate Assessment contains sufficient information in regard to Maltese seabirds ecology and biology, as well as the threats the birds are facing including the light pollution. However, we find some conclusions drawn in the AA inadequate, such as the statement that the development is unlikely to cause significant impact on seabirds in terms of strandings as long as it does not increase lighting. Rather it should be clearly stressed that the mitigation measures to minimise **light pollution** in form of light spill, glare and light trespass are required in either way, since the site is located in a sensitive coastal area and in close proximity to seabirds colonies: particularly, the largest on the Maltese islands Yelkouan Shearwater colony on the cliffs of Rđum Tal-Madonna - this colony is located approximately 2.3km from the proposed development. Furthermore, the site has also been identified as a major stranding hotspot for fledging seabirds and must therefore be considered a priority area for mitigating light pollution. The developer therefore should not be encouraged to remain at the existing level of lighting, but rather to take all possible measures to reduce and lower down the light pollution as much as possible. According to the AA, the detailed exterior lighting regime has not been finalised yet, although the Night Lighting Plan has been proposed. Apart from the EIA mitigation recommendations, we would like to suggest the following to be considered:

- ◆ all outdoor lighting to be installed is kept to the absolute safe minimum level with the special attention given to luminaires installed with direct line of sight to the sea;
- ◆ balcony lighting should be controlled by hotel guests and not left switched-on for extended periods of night;
- ◆ the critical fledging times of year: June - July (Yelkouan shearwater) and October - November (Scopoli's shearwater) demand extra consideration to use the outdoor lighting. During these periods all outdoor lighting should be dimmed as far as possible or switched off entirely.

Apart from that, we see the need to address the issue of lighting regime during the construction phase into the EIA, even if it is not expected to carry out the construction activities during the night hours, it should be stated that all the lighting should be switched off or minimized during night. The finalized lighting plan should be assessed separately.



Assessing the **air pollution** during the demolition/construction phase, the EIA report says, particularly, the impacts from dust emissions is considered to be of no significance to minor negative significance. Given the scale of the project and the duration of the construction phase we see such an assessment as not relevant. Dust is one of the sources of particulate pollution which in turn is harmful for human health and the environment. It is important to work out feasible mitigation measures to prevent the spread of dust into the natural environment. The development will happen in proximity to the sea, under certain weather conditions and if not controlled dust emissions from the construction can also influence the water quality around the coast, contributing to turbidity. The area is known for hosting internationally protected *Posidonia oceanica* meadows which are considered as primary forests and therefore fall under special protection according to the EU Biodiversity Strategy 2030. Possible adverse impact of the construction dust on *Posidonia* meadows should be thoroughly assessed. The development is adjacent to an important Marine protected area SCI *Żona fil-baħar bejn il-ponta ta' San Dimitri (Għawdex) u il-Qaliet* and SPA *Żona fil-baħar madwar Għawdex*, and so the impact on the marine environment should be assessed accordingly.

The loss of 19 **protected trees** (equates to approximately 20% of protected trees present on the site) is assessed as such of not significant impact, however we believe the issue has been underestimated. According to the Eurostat, only 1% of Maltese territory is afforested, and sacrificing of protected trees should not contribute to this drastic statistics. Since there is no detailed landscaping plan to refer to, it is important to give this question further considerations after it is finalised with the preference given to replanting rather than removing the trees.

It is estimated that approximately 36,000 m<sup>3</sup> of excavated material will be generated, of which most will be rock. The developer does not consider using the excavated rock on site, however we would like to suggest amending a **waste** management plan, with an idea to prioritise the reuse of the construction waste on the site. Waste routes to identified waste deposits need to be worked out and assessed along with the capacity available to intake the required volumes. Should the development involve any routes via maritime transportation, the end destination of such waste also needs to be determined and assessed.

## CONCLUSION

- The timing of demolition/construction works should be specified explicitly, with the special attention given to avoiding the works during periods sensitive for seabirds.
- The finalised outdoor lighting scheme should contribute to light pollution minimisation and mitigation and should be designed in line with the Guidelines for Ecologically Responsible Lighting.



- Air pollution mitigation measures, specifically due to dust emissions, need to be considered thoroughly.
- Reassessment of the impact relating to the loss of 19 protected trees should be done after the landscaping plan is prepared.
- The option to reuse the excavated rock material on site rather than backfilling it needs to be considered.