



BirdLife Malta's recommendations of the ToRs for the EIA for PA/04687/10  
Proposed scuttling of the M/T Hephaestus at a site off the south coast of Qala,  
Gozo to create a new diving attraction

21 January 2022

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After having reviewed the Project Description Statement for the aforementioned development, as well as the EIA Screening Report, BirdLife Malta would like to contribute to the public consultation with regards to the ToRs for the EIA.

The vessel proposed for scuttling is a former oil tanker, over 61m long and about 8m wide with a total footprint constituting for 500m<sup>2</sup>. The site for scuttling is located offshore within the Natura 2000 sites:

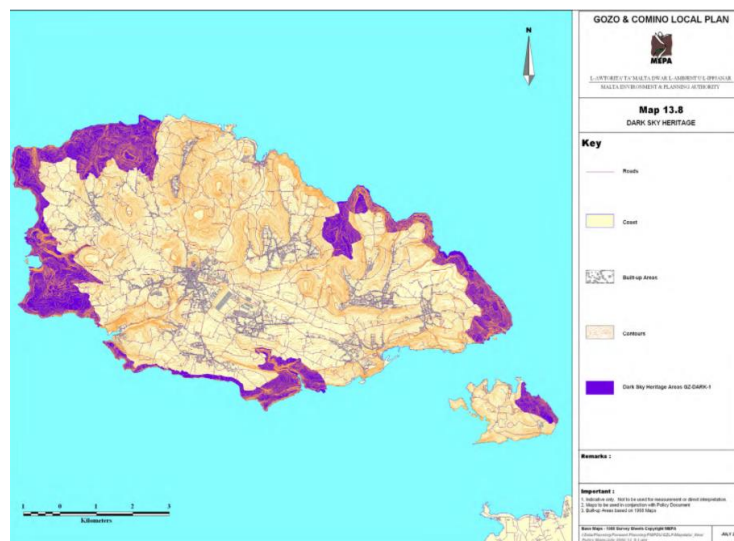
- Special Area of Conservation *Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u Il-Qaliet*, and
- marine Special Protection Area *Żona fil-Baħar ta' madwar Għawdex*.

It falls within the area which widely hosts protected *Posidonia oceanica* meadows, therefore the applicant had commissioned a survey to conduct the mapping of benthic communities during which several patches of "bare" sand in between the Neptune grass agglomerations were found, one of which is proposed as a location for the scuttling. At the same time, the PDS admits that "*boundaries between different benthic assemblage types are not necessarily as sharp as depicted on the map, since biotic assemblages and habitats often grade gradually into each other to form ecotones between adjacent assemblages that may extend over several metres*". Additionally, as stated in the EIA Screening report, the area is an example of pristine natural environment so far not heavily influenced by anthropogenic activity, therefore any development must be carefully assessed as to potential adverse impact on the area, especially given that by nature the development in question is likely to lead to the increased human presence within the site area.

Therefore, for the Terms of Reference we suggest considering the following:

- ❖ possible impact of scuttling activity on adjacent *Posidonia oceanica* assemblages (direct damage as well as impact due to potential worsening of water quality noting that the vessel proposed for scuttling is a 60-m former oil tanker and considering the scenario when the cleaning was incomplete);
- ❖ possible impact from loss of habitats as a result of scuttling and deployment of the vessel, as well as laying of concrete sinkers should also be studied, given special attention to analysing the scenario when the scuttling/vessel deployment is inaccurate;

- ❖ the PDS states that “anchoring at this site will not be allowed and instead mooring buoys will be deployed for use by dive boats”, hence the impact from mooring buoys on benthic communities should be analysed, especially noting the abundance of *Posidonia oceanica* on the site;
- ❖ possible increase in light (and noise) pollution levels from boats in case of diving in dark hours should be assessed, taking into account the presence of seabird colonies (namely, Yelkouan Shearwater and Scopoli’s Shearwater colonies located at the area of Santa Marija Bay in Comino and Ta’Cenc cliffs in Gozo) and designated Dark Sky Heritage Areas in Gozo;



- ❖ at the stage of ship preparation and cleaning there expected a considerable amount of potentially hazardous waste generated (such as PCBs, asbestos, fuels etc.), therefore we suggest the need to thoroughly assess the waste management plan;
- ❖ we suggest that the increase of boat traffic is to be assessed as well, establishing potential impact on the protected marine environment in terms of light, noise, oil spills, etc.; increased human presence in the area and subsequent anthropogenic pressures should be assessed;
- ❖ environmental consequences of the introduction of a no fishing zone around the site should be assessed in terms of shifting of a fishing activity to the surrounding marine protected area, and any spill over effect to other sites as a result;



- ❖ This coastal area is known for its relatively pristine waters, so much so that it is one of the extraction points of the recently reinstated Reverse Osmosis plant operated by Water Services Corporation for the supply of potable water to Gozo:
  - Accordingly, we would like the EIA to delve into predicting the impacts on water quality during both the scuttling phase, and during the 'operational' phase of the area which would see boat traffic mooring to the area for diving and other related increased human activities.