

BirdLife Malta's representation on the PA 02673/22
Proposed Quarry for Hard Rock, Benghajsa, Birzebbuga
27th May 2022

BirdLife Malta would like to provide our feedback with regards to the proposed hard rock quarry in Birzebbuga which is featured in the submitted PA 02673/22.

Firstly, the site proposed for such a massive and impactful development borders protected cliffs which are designated as an Area of High Landscape Value. The site also lies in a buffer area to the Natura 2000 site – designated as a Special Area of Conservation (MT0000024 *Rdumijiet ta' Malta: Ir-Ramla taċ- Ċirkewwa sal-Ponta ta' Bengħisa*) and a Special Protection Area (MT 00000033 *Rdumijiet ta' Malta: Wied Moqbol sal-Ponta' Bengħisa*) due to the presence of seabird species of high conservation value. Environmental considerations in relation to the colonies of Yelkouan shearwater *Puffinus yelkouan* and Scopoli's shearwater *Calonectris diomedea* require special attention when planning any developments in close proximity to these colonies.

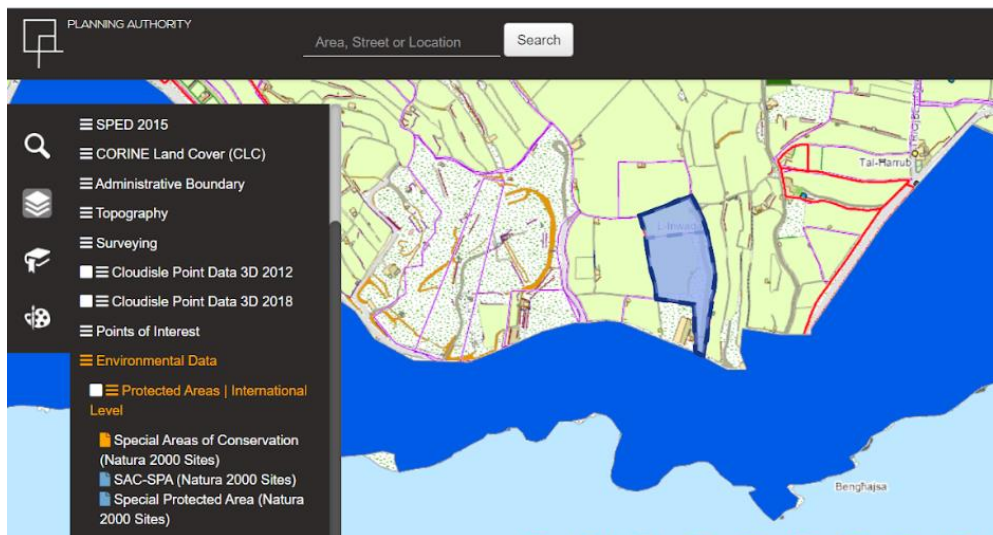


Figure 1. The proposed development bordering the Special Area of Conservation, Natura 2000 site

Because of its nature, the development in question is expected to become a source of permanent massive light pollution, as well as vibrations and noise pollution. The shearwaters carefully select their breeding habitat according to various parameters, including darkness and low levels of human disturbance. The environmental impacts of light pollution are pervasive and far-reaching. Negative effects can range from various sub-lethal effects, such as changes in biochemistry or behaviour, to the direct cause of mortality. Any obtrusive light, including skyglow, affecting the Special Area of Conservation is unacceptable. Noise and vibration levels should not be excessive, since this may have adverse impact on the breeding behaviour of the seabirds forcing them to flee the colonies. The quarry is also expected to become a substantial source of dust pollution (or particulate matter), and the impacts arising from this should not be ignored in an area which is free from development and used mainly for agriculture.



Furthermore, the site is also an Area of Ecological Importance. The site lies Outside Development Zone and will occupy over 6200 m² of land, the primary use of which is agriculture, and is very likely to cause an increase of traffic and trampling, particularly due to the presence of heavy machinery. According to SPED, “permanent damage to ecology and landscape is a significant threat whilst dust emissions from quarry operations affect agriculture and health”, moreover “the current situation [with extraction of minerals] is considered to lead to unsustainable use of resources” especially given the limited territory of the Maltese islands.

Important to mention that the proposed development widely contradicts SPED, namely:

- Thematic Objective 7 which states that:
 - further mineral extraction should be considered through “extensions of existing quarries provided that there is no adverse impact on protected areas and species”;
 - agricultural land and gardens should be protected to prevent loss of soil and soil sealing.
- Thematic objective 8 which promotes the importance of:
 - safeguarding protected areas, including SACs whilst enabling activities aimed at enhancing their management objectives;
 - Controlling sources of light pollution which negatively affect rural areas.
- Rural objective 1 which urges to:
 - protect good quality agricultural land from development;
 - control cumulative effect of development in rural area
- Rural objective 2 which states the need to minimise negative effects from vehicular access on protected areas and areas of high landscape sensitivity
- Coastal objective 1 which calls to designate a predominantly terrestrial rural coast to encourage the continuation of traditional agricultural use, to restrain mineral extraction from extending towards the coastline.

Based on the above, BirdLife Malta objects to the proposed development given the scale, nature of the project, the location of the site in the vicinity to important seabird colonies, as well as the fact that the development in question contradicts SPED and ODZ policies. We also would like to stress that in any case the development qualifies for environmental permitting procedures with ERA, and should be subject to an Environment Impact Assessment. Nonetheless the impacts such a massive and disturbing development would have on the cliff habitats of ecological value to seabirds and other fauna and flora, should warrant the development not to be considered further, given the likelihood that no mitigation measures can guarantee from the degradation of such habitat.