

## BirdLife Malta’s recommendations on the EIA Terms of Reference for the Second Electrical Interconnector between Malta and Sicily July 2022

BirdLife Malta have analysed the documentation presented online with respect to the above-mentioned project and we would like to make our contribution into the process of drafting ToRs for the EIA.

Firstly, the Project Description Statement (PDS) offers a number of alternative routes for the 2nd interconnector both on land and offshore, listing advantages and disadvantages for each. We would like to point out that before the decision as to which route to choose is taken, a rigorous analysis should be done concerning all the possible impacts such a massive development can have on the environment, both marine and terrestrial. With regards to Marine route alternatives, it is important to note that all of them are to cross one or more Marine Protected Areas, as seen on Figure 1.

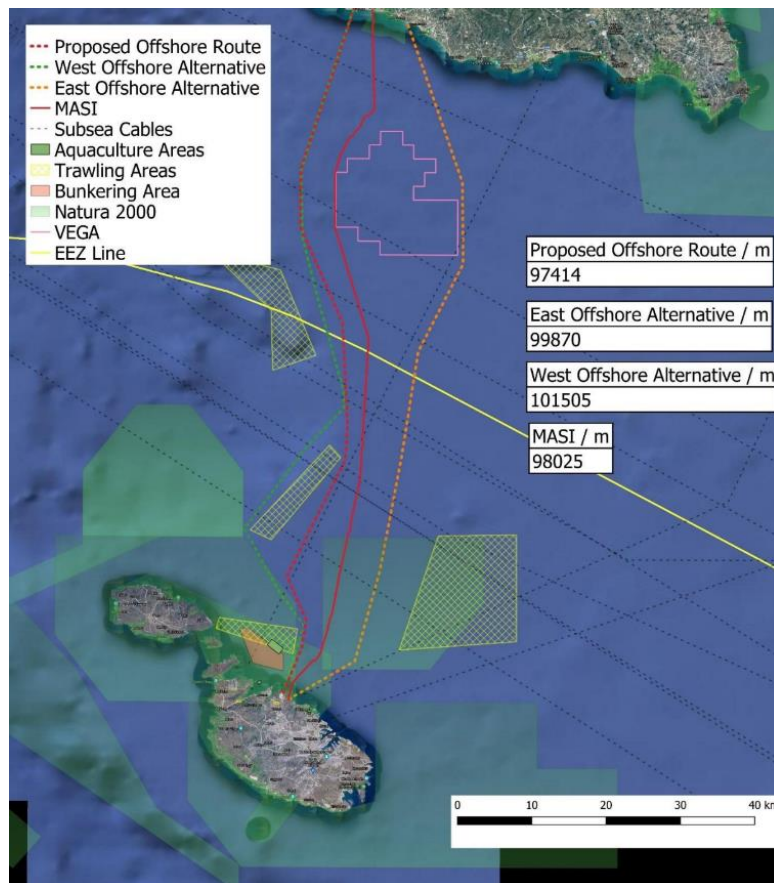


Figure 1. Offshore Route Proposals for the IC2 Malta-Sicily and the Marine N2K areas (PDS)

It should be said that the law states that a “Strategic Environmental Assessment shall be carried out for all plans and programmes which are prepared for... energy” (L.N. 497 of 2010). Article 6 of the Habitats Directive (Council Directive 92/43/EEC) provides that “any plan or project not

directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implication” (also according to S.L. 549.44). Therefore, the plans should be screened to determine whether the development could have a significant effect upon any species or habitats of concern. If the possibility of a significant effect cannot be excluded then an Appropriate Assessment must also be undertaken. This is in addition to the requirements for EIAs and SEAs. The assessment under the Water Quality Framework should be done as well, given the nature of the project.

In terms of route proposals onshore, the project is also likely to have an impact (the intensity of which will depend on the chosen option) on terrestrial Natura 2000 site as can be seen in Figure 2 below:

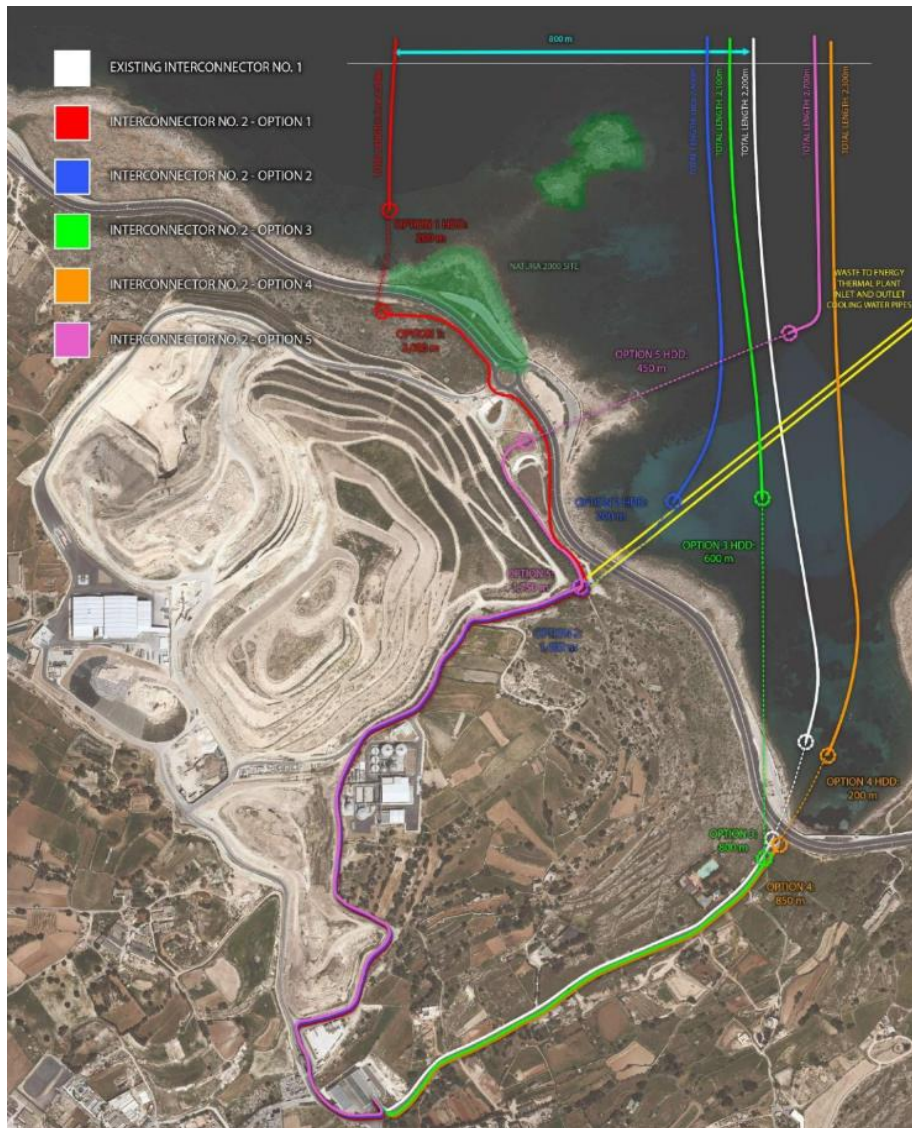


Figure 2. Malta onshore route alternatives and a Natura 2000 site (in green)

In any route that shall be chosen, the interconnector cables while passing electrical currents are expected to raise the temperatures of their surrounding sediment and water. This could have various effects on the marine environment including an increased risk for botulism in coastal areas resulting in an increased death rate for wading birds and water birds<sup>1</sup>. The area around Maghtab Environmental Complex is already likely to be a source of botulism which affects, for instance, gull species which feed on waste. Therefore, we would like to request an assessment of the potential impacts in regard to the change of local coastal water temperature.

The change in sediments dynamics and conditions can also lead to alterations in the plant community composition. The areas in question are known to host protected *Posidonia oceanica* meadows whose status should be further improved rather than jeopardised.

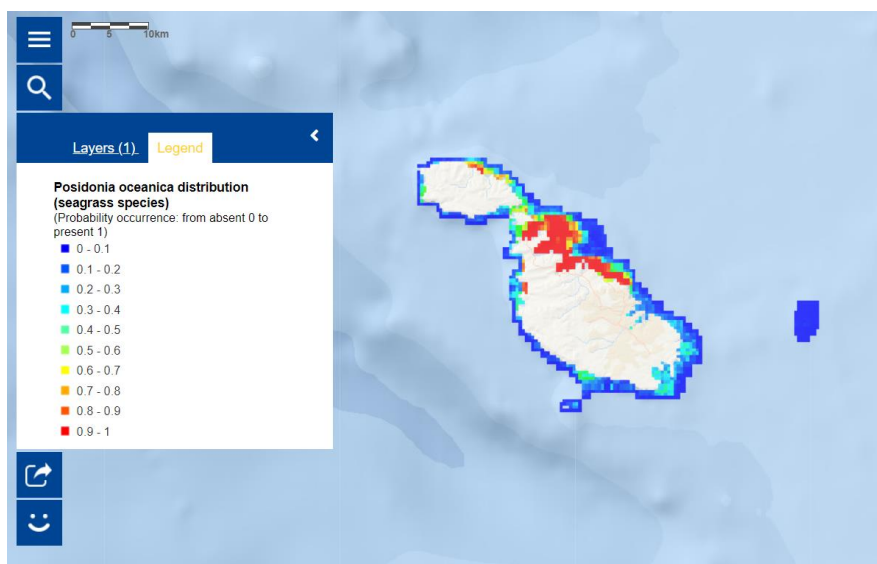


Figure 3. *Posidonia Oceanica* distribution ([European Atlas of the Seas \(europa.eu\)](http://European Atlas of the Seas (europa.eu)))

Cable laying activities can impact the zoobenthos, such as disturbance of intertidal habitats. Furthermore, due to anthropogenic seabed disturbance the benthic community composition can be altered.

Although it is stated that the works offshore are not going to happen 24 hours in a row, it is important to give special attention to the possible environmental impacts arising from increased marine traffic during the construction works, and associated risks such as oil spills and noise pollution which can cause stress and reduction of biological fitness to marine life, as well as temporary or permanent exclusion from habitat. In case when the works happen during dark hours, light pollution can be a significant threat, since navigational illumination can attract birds and subsequently lead to the increase in risk of collision. As mentioned before, certain areas proposed for cable laying would fall within the designated Marine Natura 2000 sites and are known to be foraging/rafting areas for protected seabirds, namely the IUCN red-listed species Yelkouan Shearwater *Puffinus yelkouan* and Mediterranean Storm-petrel *Hydrobates pelagicus*. The works onshore and offshore are proposed to be carried out exactly during the sensitive for

<sup>1</sup>[www.ospar.org/documents?v=6991](http://www.ospar.org/documents?v=6991)

the seabirds periods when they are present in colonies (please refer to the table below) and as a result of which seabird activity of birds transiting between feeding grounds and their colonies would be expected.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Calonectris diomedea</i>												
<i>Puffinus yelkouan</i>												
<i>Hydrobates pelagicus</i>												

Figure 4. Presence in colonies of tree pelagic seabird species

Additionally, the project includes trenchless activities to place the cable onshore which are associated with impact on geomorphology and hydrology of the area. Prior to any works with regards to the excavation of trenchless approach to the coast and on land, a thorough study on geology should be conducted to exclude the risks of material collapse, especially during the contraction phase which is to cause massive vibrations.

## Conclusion

Given the location, scale and nature of the project, we request that this development is adequately screened for its requirements for a Strategic Environment Assessment, an Environment Impact Assessment and an Appropriate Assessment, and obligations under the Water Framework Directive which should have a full consideration of the following:

- A proper assessment of alternatives which should include also the possibility of avoiding sensitive areas of benthic habitats and designated Natura 2000 sites;
- Impact on geology and geomorphology followed by a comprehensive study;
- Impact on hydrology including the valley watercourse;
- Impact on agricultural land;
- Impact on air quality (especially in terms of particular matter);
- Impact on water quality, including turbidity (especially given the coast, the seabed was smooth consisting of sandy clay and silty fine sand starting from 11km from Malta shore and further);
- Impact coming from increased noise pollution and vibrations (during the construction phase) both on land and at sea;
- Impact on ecology and the assessment of possible habitat loss on land and at sea (with a particular focus on *Posidonia oceanica*);
- Light pollution impacts, including the impact on avifauna;
- Marine traffic assessment during construction;
- Impact on traffic on land coming from the heavy machinery movements;
- Assessment of the waste management scheme



❖ Operational phase

- Impact on seabed and coastal waters, including due to temperature increase (paying thorough attention to the cumulative effect arising from other sources of heat or contamination, such as the approved Waste to Energy Plant which is to have a water cooling discharge pipe opening into the coastal waters);
- Impact on ecology;
- Light spill during maintenance and regular check-in works

Apart from all the aforementioned, there is a high risk of negative cumulative effects arising from other planned large-scale projects in the same area, such as:

- Melita TransGas pipeline which is likely to cross with the route of the proposed 2nd Interconnector;
- Waste to Energy Plan in Maghtab (particularly, in terms of warm water discharge in coastal waters).

Therefore, we recommend including also the evaluation of the cumulative effects.