



BirdLife Malta's comments on the Environmental Report for the SEA of the EMFAF Programme 2021-2027

26th July 2022

BirdLife Malta has reviewed the Environmental Report for the SEA of the EMFAF Programme 2021-2027. We would like to note that the prepared report is quite comprehensive and well structured, however there are several issues which need to be highlighted.

Environmental Impacts

In the summary table of measures assessment with regards to impacts on Biodiversity (Table 15), it is stated that an action concerning diversification of fishing activities will not have an effect on biodiversity which is not exactly correct. Depending on the measures, the diversification of fishing activities is a relevant response to changes in the availability of fish stocks and/or in changes in the environmental state of the marine system driven by climatic and other pressures. According to the draft operational programme, five main species are mainly targeted due to market-driven preferences in Malta. In this context, marine biodiversity is expected to benefit from such a measure as diversification of fishing activities which is likely to contribute to general sustainability of the sector. Additionally, the action relating to the *Improving research base of the local fisheries sector* is also of positive potential, since it contributes to the knowledge gaps closure and hence to better understanding and assessment of the fisheries state and ways of improving its environmental performance.

The fact that one of the aims of the programme is the promotion of the Fisheries and Aquaculture sectors, the pressure on biodiversity resources and impacts resulting from user-conflict and competition for space/resources should be given thorough consideration (namely, regarding the relationship between fisheries and seabirds and the possible conflicts due to competition for fish which comprises seabirds main dietary component).

It is important to mention that the negative impact on landscape, especially when it comes to sensitive coastal areas where the main physical interventions (such as physical restructuring of the coastline; investments in ports or other infrastructure to provide adequate reception facilities for lost fishing gears and marine litter collected from the sea, etc.) are about to occur, is likely to be significant and will require separate environmental impact assessment when detailed project description is prepared. Furthermore, the impact arising from construction waste disposal (especially, offshore) shall be evaluated separately at a later stage as well.

The SEA report states that EMFAF operational programme measures are not likely to be associated with any transboundary environmental impacts, however we recommend reassessing this statement given that the draft operational programme says: "*EMFAF support may also complement cross-border and transnational programmes in areas related to the green transition and risk management, including in coastal areas*"; moreover, the section "*Collection, management, and processing of data for fisheries and aquaculture management and scientific purposes*" includes the action with regards to conducting



“national, transnational, and subnational multiannual sampling programmes, if these relate to stocks covered by the CFP”.

The section dealing with air quality impacts is lacking the assessment of the impact resulting from the increased marine traffic including due to the purchase and use of patrol vessels, aircrafts, and helicopters for fisheries control. Further associated impacts on the marine environment, such as possible pollution of waters with oil, as well as underwater noise pollution from the increased maritime traffic in Maltese waters should also be taken into consideration.

Data gaps

We noticed that some data presented in the Environmental Baseline section is outdated, for instance, air pollution information summarised in the Figures 2-13, as well as data which is presented in the Figures 56-57 which refers to the fisheries bycatch over the years 2008-2010. We are of the opinion that the baseline data to be used for the SEA should be more up-to-date to draw valid conclusions.