



BirdLife Malta's comments on the AA and EIA reports prepared for the Second Electrical Interconnector between Malta and Sicily

20th June 2023

Having analysed the Coordinated Assessment and Appropriate Assessment documents, BirdLife Malta has noted an extensive effort put into the compilation of the environmental reports and would like to contribute to the public consultation process with the following feedback.

Taking into account that the area is in the vicinity of marine and terrestrial N2K sites, as well as highly sensitive in terms of seabirds' presence, we strongly recommend avoiding night-time operations which require excessive and not environmentally friendly lighting when possible. It is mentioned in the Coordinated Assessment that proper lighting is required for the jointing operation, however not specifying the details of a lighting scheme. The report states: "If lighting is required, downward facing luminaires should be installed within the facility to reduce light pollution during the operational phase", however as important as this measure is, it is not sufficient and needs to be supplemented by a set of others (ERA's Guidelines for the Reduction of Light Pollution in the Maltese Islands should be used throughout the duration of works). The timeline of construction works also foresees at least 8 months of 24-hour per day operations. With an improper lighting scheme, this can lead to adverse impacts on marine avifauna (including bird strandings, collisions, etc.). Any additional light pollution during the construction phase should be prevented whenever feasible. Light spill during maintenance and regular check-in works (operational phase) should also be given special attention in the assessment.

The area disturbed by presence of the HDD machinery platform onshore should be duly rehabilitated after the drilling/construction works are finished to allow for further natural restoration. Constant monitoring of works during drilling/construction should be ensured.

The HDD method includes the exit hole which is said to be located within a rocky area hosting dense *Posidonia oceanica* meadows. Further works involving cable-laying offshore are also likely to have adverse impact on the protected habitat. The high conservation value of *Posidonia oceanica* and its vital role in the ecosystem require a careful approach which would prioritise damage prevention. The cable laying operations will also have impact on sediment dynamics and conditions which in turn can lead to alterations in plant community composition, including adverse implications for seagrass.



It is expected to have as much as 4,374 m³ of excavation materials (mostly soil) produced during the construction/excavation phase, however judging by the information provided in the report, it is not planned for reuse (Figure 1). This is a significant omission and we suggest addressing it to make sure all the measures have been taken to reuse the excavated material to its full potential.

TABLE 6: VOLUMES OF EXCAVATED MATERIAL AND BACKFILLING

WORK	UNIT	TRENCH	JOINT	HDD	TOTAL
Total excavation	m ³	3,715	269	350	4,374
Earth disposal	m ³	3,715	269	350	4,374
Backfill (re-use)	m ³	0	0	0	0

Figure 1. Volumes of excavated material and reuse. Source: Coordinated Assessment report

As an important mitigation measure, we recommend choosing the right timing for the works lasting longer than daylight hours. Such timing should take into consideration sensitive periods for seabirds. We suggest conducting the works which may cause high disturbance outside the breeding season of the seabird species, namely the IUCN red-listed species Yelkouan Shearwater *Puffinus yelkouan* and Mediterranean Storm-petrel *Hydrobates pelagicus* which are known to make frequent use of the marine and coastal areas in question. This would equate to having the works done between October and February ideally.

The cables which pass electrical currents are usually associated with impacts on the temperature of the surrounding sediment and water. This may have various effects on the marine environment including an increased risk for botulism in coastal areas resulting in higher mortality rates for wading birds and water birds¹. The area around Maghtab Environmental Complex is already very likely to be a source of botulism which affects, for instance, gull species feeding on waste. Hence, an assessment of potential impacts with regard to the change of local coastal water temperature (paying thorough attention to the cumulative effect originating 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) would be beneficial to prevent and avoid risks. The cumulative impact of the heating effect on waters in the area should be assessed.

Certain negative environmental impacts are inevitable, such as trampling of the terrestrial habitat (HDD platform and machinery), disturbance and damage of the

¹ [Microsoft Word - bd wind farms.doc \(amazonaws.com\)](https://www.amazonaws.com)



marine habitats, increased water turbidity, underwater noise pollution, etc., furthermore some of these impacts are of residual nature. In such a case, it is important to work out and implement a set of satisfactory compensation measures to cater for the above. The list of compensatory measures provided in the Coordinated Assessment report (p. 412) is strongly recommended as highly beneficial for the Yelkouan shearwater, other seabirds and their habitat. Compensation measures could focus on re-instating the coastal area of Qalet Marku which is in dire need of proper management and would gain from adequate protection. We suggest granting stronger protection to the area around St Mark's Tower to ensure good status of the protected habitat which is currently under an immense anthropogenic pressure (e.g. trampling of the garrigue).

Given the nature and scale of the project, an in-depth evaluation of cumulative environmental impacts is essential. 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;
- Waste to Energy Plant in Maghtab (particularly, in terms of warm water discharge in coastal waters);
- Organic Processing Plant;
- Material Recovery Facility, etc.