



BirdLife Malta's comments on the EIA and AA reports in relation to the construction of an organic processing plant,

ECOHIVE complex, Naxxar

17th May 2023

Having analysed the respective reports, BirdLife Malta would like to provide the feedback as follows.

Light Pollution

Despite the suggested use of sustainable practices and standards (such as the Guidelines for the Reduction of Light Pollution in the Maltese Islands), the impacts from the increased light pollution are not assessed rigorously. The developer proposes to install at least 65 luminaries on 9m-height poles around the site; in addition, separate buildings within the scheme are going to be higher than 20m which can also contribute to light spill. The report does contain a remark on cumulative light pollution which shall be greatly increased due to various planned developments on the territory of the ECOHIVE complex. Nevertheless, no additional proportionate mitigation measures are proposed in this context. In case of such a massive cumulative effect, it makes sense to develop an integral lighting scheme for the whole complex and design it in a way to avoid additional light spill, or better reduce the existing levels of light pollution in the sensitive coastal area which is already so densely illuminated.

Terrestrial ecology

Given that a major part of the site is either natural habitat (almost 40%) or agricultural land, the mitigation measures with regard to habitats and protected species loss should be more proportionate, well-defined and timely. The EIA evaluates the impact from habitat loss as such of moderate significance, however given the irreversibility of it, the significance is rather high.

The study conducted under the AA process, discovered the presence of black rats on site, however, no biosecurity measures have been proposed for the OPP operation, especially taking into consideration the nature of materials to be handled in this facility.

Even though the study did not establish any breeding sites of bats within the area, they use the area for commuting and foraging, therefore, the impact of increased noise and light pollution on the species should be analysed in depth, as well as potential loss of foraging area.



The survey also detected the abundance of Algerian hedgehog in the area. Intensified traffic on site and also increased illumination can lead to lethal consequences, not to mention the impacts arising from species' habitat loss. However, the report does not provide any mitigation measures in this regard.

Generally, the conclusions of the AA create an impression that environmental impacts with regard to protected areas are not of major concern; very few mitigation measures are listed. Considering the location and nature of the development, compensatory measures proposed should be of a larger scale and of mandatory nature.

Marine ecology

Impacts arising from possible spillage and leakage of fuels, chemicals and waste water are not given special attention in the EIA. The marine waters in proximity to the site are protected and the habitats they support are vital to preserve (including *Posidonia oceanica* beds), and given potential risks of contamination due to presence of such a facility onshore, the impacts should be evaluated more carefully and mitigation measures proposed should help to address adverse impacts efficiently.

We once again would like to emphasise the importance of analysing possible implications on the Yellow-legged gull and other gull populations which feed on waste at Maghtab. Over the years, Maghtab has become a food source for local breeding species such as the Yellow-legged Gull, and for especially wintering gulls such as the Mediterranean Gull (Annex 1 BD species) and the Black-headed Gull which number into thousands of individuals visiting the landfill on a daily basis in the winter months.

With the OPP coming into operation the amount of organic waste in the landfill is expected to be gradually reduced, thus depriving the gulls of an artificial source of food. Though the removal of an artificial food source should reduce the dependence of gulls on waste, there might be multiple repercussions if such waste disposal and use practices are carried out haphazardly and without careful planning.

Should the waste source be rendered unavailable during winter months, the net result will possibly be thousands of gulls stranded and starved, in turn creating pressure on bird rescue resources on the island, and possibly also resulting in various birds venturing into urban areas, surrounding road infrastructure, fish farms, agricultural land etc., in turn causing other hazards and impacts associated with such behaviour.

The closure of any available organic waste would have the least impact if this is timed to occur during the end of summer, when the locally breeding Yellow-legged Gulls would



have finished their nesting season, and before wintering gulls start appearing in the autumn months. Such an impact would be rendered to its minimum accordingly.

Nonetheless, mitigation measures should still be in place to cater for an unavoidable number of gulls being impacted as a result of the operation of the OPP. Measures should be in place to be able to assist and rescue gulls in difficulty at the Maghtab facility and surrounding areas. Tracking and studying gull behaviour, before and during the operation of the OPP could also be a suitable means of addressing issues with gull behaviour in order to inform of the effectiveness of measures and practices at the facility and how these could avoid attracting gulls to the area in the future, or whether the unavailability of organic waste to gulls is causing impacts elsewhere.

Soil

The risks of contamination of underlying soil in case of spillage and leakage of chemicals (including Nitrates)/fuels/wastewater is not assessed fully. One of the measures mentioned in the EIA is to “possibly” lay a geotextile layer, while we suggest that such a measure should be mandatory to avoid the infiltration of wastewater into the soil and groundwater. Monitoring of soil contamination levels should be ongoing on site and effective and timely measures undertaken in case its state is compromised. Apart from that, the EIA does not adequately cover the mitigation of soil loss.

Waste

The amount of excavation/construction waste which is not planned to be reused on site is massive (37,400m³) and is to be “catered away” with no explicit reference as to where to or by which routes. Remembering the objectives of the Waste Management Plan for the Maltese Islands till 2030, such an omission creates inconsistency and should be addressed. Furthermore, the facility’s Waste Management Plan during operation is not evaluated carefully, including from the biosecurity perspectives (pest prevention and control).

Air Quality

Impacts of the OPP operation on the ambient air quality is not fully addressed either with most attention given to dust and odour. The envisaged ventilation ducts are said to remove dust and compounds like ammonia and hydrogen sulphide, however not covering such pollutants as methane, carbon dioxide, etc. The studies show that residual digestate set for composting frequently becomes a source of release into the air of such gases as CO₂, CH₄, N₂O, NH₃, H₂S, CO¹. In addition, the combustion of biogas produced during the process of anaerobic digestion is a source of carbon monoxide, nitrogen oxides and sulphur dioxide emissions into the air. It is estimated that “the use

¹ [Air Pollutant Emission Rates for Dry Anaerobic Digestion and Composting of Organic Municipal Solid Waste | Environmental Science & Technology \(acs.org\)](#)



of internal combustion engines to burn this biogas also can generate formaldehyde emissions at higher levels than occur with other fuels”², therefore, it can be useful to evaluate the impact on air quality from this perspective. Such an evaluation is particularly vital in the context of cumulative effects due to operation and development of the facilities nearby (within the ECOHIVE complex itself).

To conclude, apart from the list of environmental impacts present in the reports being not complete, the EIA also does not suffice for a strong and adequate set of mitigation measures to at least minimise those listed. Furthermore, the AA basically argues that the facility is not to have any major impacts on the protected areas nearby, which can hardly be the case.

²[Anaerobic Digesters | Department of Environmental Conservation \(vermont.gov\)](#)