BirdLife Malta's comments on the Air Quality Plan for Malta

30th October 2023

BirdLife Malta would like to submit the following feedback as part of the public consultation process relating to the draft Air Quality Plan for Malta proposed by ERA.

Clean air is a basic requirement for human health and the health of ecosystems, however the air quality is evidently in decline on a global scale. Among major concerns for Malta are the concentrations of particulate matter (PM10, PM2.5), Sulphur dioxide (SO_2), Nitrogen Oxides (NO_x) and Ozone. Although some of these pollutants can originate from natural sources (sea salt, soil, sand, etc.), transport, including maritime traffic, is responsible for a large share of such pollutants released into the ambient air. Such anthropogenic air pollution can and should be minimised as much as possible.

Primarily, we would like to emphasise the importance of ensuring an effective air monitoring programme which can be based only on reliable and representative data collected on a permanent basis. It is important that the air monitoring stations are aligned with the requirements under the Ambient Air Quality Directive, including the microscale siting criteria. We recommend that the proposed Air Quality Plan includes the revision of existing monitoring stations to make sure that their locations and design are in compliance with the Directive's criteria.

One of the major contributors to air pollution in Malta is maritime traffic. Unfortunately, in Malta knowledge of problems resulting from ships emissions remains widely unknown, with awareness of this matter only flagged in past years, triggering some limited remedial actions.

Last year, the IMO designated the Mediterranean Sea as an Emission Control Area (ECA) for Sulphur, meaning that from 2025, all ships in the area will have to use cleaner fuel with low Sulphur content in it. Future steps should lead to the agreement of an ECA for Nitrogen to further ensure cleaner air for millions of people living in the Mediterranean region. Given its location in the middle of the main maritime routes and its dependency on shipping, Malta should be a leading actor promoting cleaner air in the region for the sake of its own citizens and the environment. We once again would like to take the opportunity and urge the government to support the initiatives to designate the Mediterranean ECA for Nitrogen at IMO.

The situation with air pollution is critical in localities close to the Grand Harbour. For instance, according to a recent journalist investigation[1], the number of hours spent by cargo ships only in Palumbo shipyard has increased drastically within the last several years. Running engines of ships contribute significantly to emissions of SO_2, NO_x and PM into the air. These pollutants are proven to be linked to a number of health problems including cardio-vascular diseases, respiratory system issues, cancer, etc. Cruise liners frequency in Malta has been rapidly increasing since 2019 with sometimes up to 4 ships calling in Valletta on a single day adding a tremendous pressure onto the air quality of the area. According to data, collected by an air quality expert Prof. Axel Friedrich who came to Malta earlier this year, the concentrations of NOx in the Grand Harbour are reaching dangerous levels for human health. The shore-to-ship projects initiated by the government for the Grand Harbour and, recently, Freeport will play a key role in the reduction of levels of contaminants in the air while the ships are berthed in the harbours. At the same time, such positive steps should not be levelled out by expanding cruise traffic to Gozo.

It is important to introduce a stronger focus on the reduction of air pollution associated with maritime traffic into the Air Quality Plan. Sound measures should be identified (including mandatory engine switch-off) and implemented to minimise the air pollution from shipping. It is important to introduce an electric ferry system between Malta and Gozo, Valletta and the Three Cities. Ecological port fees could be considered for the Grand Harbour to promote cleaner shipping.

Another major source of air pollution in Malta are quarries' operations. Extraction activities lead to release of airborne particulate matter into the ambient air, which is harmful to human health, the natural environment and agriculture. It is vital to increase and strengthen mitigation measures taken by extraction companies (including afforestation activities, dust suppression through wet crushing and water sprinkling, etc.) to reduce the concentration of PM and its harmful impacts.

A great amount of dust is resulting from the construction works which, in Malta, have reached a dangerous scale. Measures to control air pollution by limiting the number of construction projects should be considered by the government. Implementation of mitigation measures on the development sites and monitoring of construction activities are not sufficient enough and should be ensured better, with strict penalties applied if permit conditions are not adhered to. This could include measures such as black-listing developers who persistently are careless and pollute during their practices. The legislation should guarantee that construction activities cause the least damage to

1 https://lovinmalta.com/opinion/analysis/revealed-open-source-data-shows-increase-in-palumbo-shipyard-traffic-after-rushed-secretive-merger-with-msc-cruises/

human health and the environment, therefore stronger regulations are needed in terms of development application and approval procedures.

In terms of reduction of air pollution from transport, recently proposed national strategies to gradually switch to electric vehicles are commendable. Although such an initiative is more than welcome, it will not solve the issue of PM and other harmful substances associated with tyre and brake wear. Sharp reduction of use of individual cars is required. Malta is at the top of the list among European countries with the most number of cars per capita, having 18,000 cars for every km^2 of roads[2]. The draft National Strategy for the Environment, National Transport Strategy and the proposed Air Quality Plan should work in coherence with one another towards a better state of the environment and air quality in the Maltese Islands.

In the context of transport emissions, the intensified air traffic should be mentioned and covered by the Plan. According to Malta International Airport statistics, the number of passenger flights in Malta annually has increased from approximately 28 thousand in 2012 to more than 40 thousand in 2022[3] contributing greatly to air pollution in the Maltese Islands.

Recently, the government has initiated several projects which are expected to have an adverse impact on ambient air quality (due to such contaminants like CO_2, CH_4, NO_x, NH_3, H_2S, CO, PM, etc.). These projects include: the development of crematoria, waste to energy plant, material recovery facility, organic processing plant, etc. Negative environmental impacts of these facilities are far-reaching and highly concerning, especially for such a small country like Malta where it is hardly possible to avoid negative impacts on residents, agriculture and the environment. The Air Quality Plan should acknowledge these additional emerging pressures in combination and propose the ways to address them. Cumulative impacts of all sources of pollution should be determined and mitigation measures implemented to minimise such.

Afforestation is a strong mitigation measure to reduce negative impacts of air pollution. However, this is not covered by the draft Plan which is a large omission due to well-known environmental benefits linked to green infrastructure. It would be useful to designate adequate areas for afforestation (where habitat restoration permits so), choosing suitable plant species proven to be effective in terms of improving air quality. Restoring natural ecosystems has a crucial role also.

[2] https://timesofmalta.com/articles/view/malta-18000-vehicles-square-kilometre-road.1022017
[3] https://www.maltairport.com/wp-content/uploads/2023/02/Annual-Summary-Report_2022.pdf

To conclude, the new Air Quality Plan should better address increasing pressures including from:

- quarry operations
- construction and demolition works
- ultrafine PM and other dangerous air contaminants associated with tyre wear
- incineration facility and other facilities proposed and being constructed within ECOHive complex
- initiated development of crematoria
- increased air and marine traffic

It is important to highlight that the revision of the EU ambient air quality legislation is ongoing to align the air quality standards with WHO recommended limits. The revision will update the limits for NOx, PM 10, PM 2.5 and other compounds. Hence, the proposed Plan will need to be revised accordingly once the revision process is finalised and new limits of air pollutants are set.

BirdLife Malta reserves the right to submit our comments and recommendations at a later stage of the consultation process.