

Dear All at ERA,

BirdLife Malta has become aware of the PA 08763/19 which will be decided on this week at the Planning Board meeting. The Planning application is recommended for approval and is featuring the extension to existing soft stone quarry in San Lawrenz and partial restoration on site.

The area in question had seen several illegalities relating to quarrying activities for which the stop and enforcement notices were issued by the Planning Authority (EC/00377/98; EC/00164/03). Furthermore, as noted by ERA the overflows of the existing quarry have evidently taken place close to the cliffs which is a Natura 2000 site Rđumijiet ta' Għawdex: Il-Ponta ta' San Dimitri sal-Ponta ta' Harrux (Special Protection Area MT0000030).

In light of the above BirdLife Malta would like to express the following concerns:

- Noting ERA's position regarding the need to restore part of the affected area to its natural state, we find it unclear why not all the affected land located within the Natura 2000 site is to be restored (Area 1 and Area 2 on the relevant maps) under this planning application, but only a part of it. The protected area would benefit from proper restoration of all the area within SPA, rather than using the Area 2 as an access route to the quarry. Using Area 2 as an access route is completely counterproductive to the N2K management objectives and does not contribute to the restoration plans for the Area 1.
- Given the nature of the project and its location which partly falls within the Natura 2000 site, the assessment under the Flora, Fauna and Natural Habitats Protection Regulations should have been initiated to evaluate the impacts on the Natura 2000 sites. The SPA MT0000030 hosts the colonies of 340-500 pairs of Scopoli's Shearwaters and 80-100 pairs Yelkouan Shearwaters¹. The scheme is bordering the SAC MT0000019 L-Inħawi tad-Dwejra u tal-Qawra, inkluz Haġret il-General impacts on which in terms of the proposed restoration and continuing quarrying operations are likely to be high with ERA stating that "The current operational quarry has led to significant

¹ era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf

degradation of the rural landscape in the area, with impacts extending right up to the cliff edge”. The proposed plans are to have direct impact on the conservation and management objectives for the mentioned N2K sites, including due to impacts on protected seabird colonies which should be duly evaluated. The AA should not be omitted.

- The area to be restored is proposed to be a transitional area to the existing coastal communities. It is important to take into account the conducted survey of the present flora species on the site to be restored, some of which are native (such as Maltese Everlasting and Maltese Giant Fennel) and should remain untouched to ensure natural regeneration processes. For the buffer area, apart from the Tamarisk and Shrubby Orache as recommended in the Restoration Method Statement, we can suggest the Maltese Salt Tree naturally appearing in the area. Importantly, the cliff edge plant assemblages affected by quarry overspills should be restored as well. Such overspills should be sufficiently removed and no further such encroachment should occur.

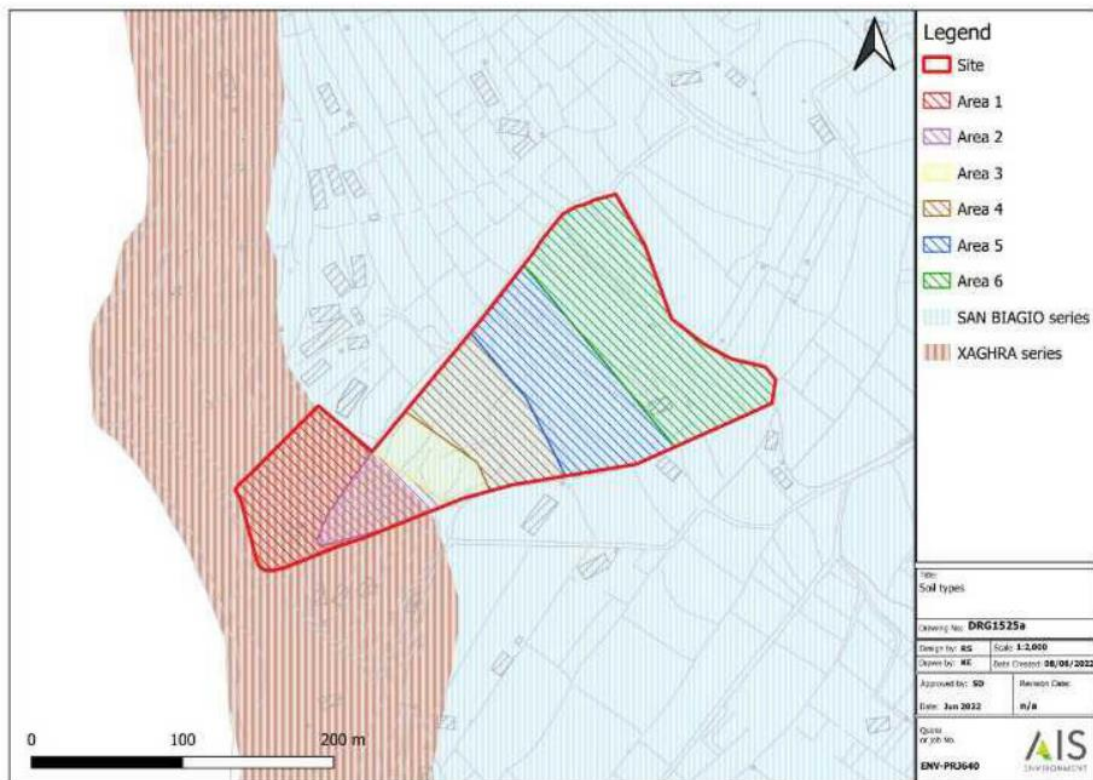


Figure 1. Areas proposed for restoration as per the Restoration Method Statement