BirdLife Malta recommendations for the EIA Terms of Reference of the PTM Waste Management Facility

8th November 2024

BirdLife Malta (BLM) would like to offer recommendations in response to the public consultation on the EIA Terms of Reference for the PTM Waste Management Facility in Ħal Far industrial estate. Having reviewed the project description statement, we have prepared the following recommendations for the EIA Terms of Reference to ensure that all potential impacts during both the construction and operational phases of the project are identified and appropriately mitigated.

Avifauna Assessment

Given the site's proximity to two Special Protection Areas - Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Bengħisa and Żona fil-Baħar fil-Lbiċ - the EIA should include a comprehensive assessment of avifauna. These areas are designated for the protection of Scopoli's Shearwater (*Calonectris diomedia*), Yelkouan's Shearwater (*Puffinus yelkouan*) and the Mediterannean Storm Petrel *(Hydrobates pelagicus melitensis)*. The most recent publication reports around 80-160 breeding pairs of *C. diomedia* at Għar Ħasan and around 90-100 breeding pairs of *P. yelkouan* from Wied Fulija to Ħal Far[1]. Any activities likely to generate vibration or noise should be avoided during the breeding season of these colonies.

Lighting Scheme

While the PDS notes that outdoor areas will not be illuminated at night and working hours are set from 07:00 to 16:00, it remains unclear if these hours apply to the construction or operational phases. We recommend that this working schedule is followed during both phases of the project. Any proposed outdoor lighting for security should be detailed in the lighting schematic, adhering to ERA's guidelines for the reduction of light pollution in the Maltese Islands and BLM's guidelines on ecologically responsible lighting. Outdoor lighting should incorporate motion sensors, be full cut-off with 0% ULR, and have a CCT of ≤3000K. However, given the proximity to shearwater colonies, we strongly advise against the use of outdoor lighting. Scopoli's sheawaters are

[1] SEABIRD FIELDWORD REPORT (2021). https://era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf.

nocturnally active seabirds and it is well established that such species are often grounded in areas polluted by artificial light. It has even been reported that chick provisioning visits by Scopoli's shearwaters decreased during disturbing human activities[2].

A robust monitoring and reporting framework should be established through the EIA to ensure that mitigation measures to reduce light pollution are being implemented during both construction and operational phases. The Ħal Far industrial estate is already impacted by significant light pollution. Data on grounding cases of seabirds in the Maltese islands identifies Ħal Far area as one of the light-induced seabird groundings hot-spots, as shown in Figure 1 below. Despite BirdLife Malta's ongoing advocacy for reduced light pollution from industrial buildings at Ħal Far, ecologically sensitive lighting recommendations have often been disregarded or forgotten after initial planning stages. To set a strong example for neighboring industrial establishments, this facility should not only adopt sound mitigation measures from the start but also maintain these practices throughout its operational lifespan.

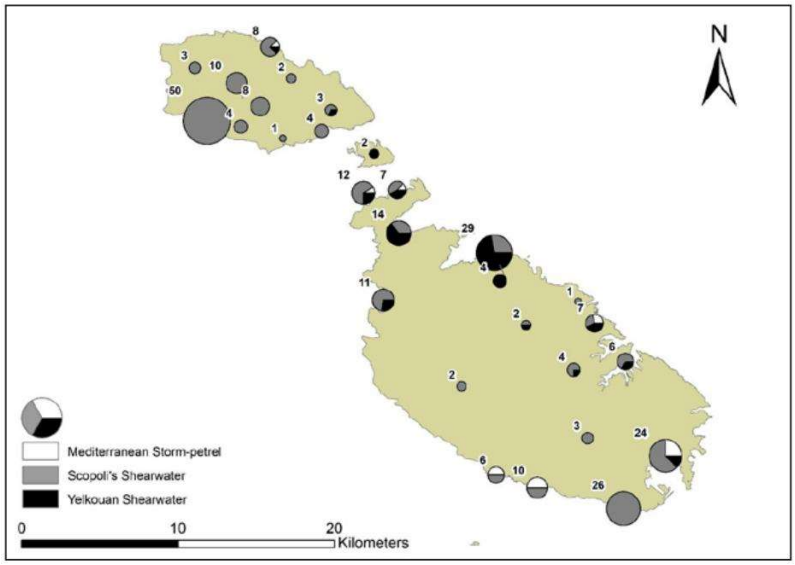

Figure 1: Locations of recorded light-induced grounding cases per species[3]

Geotechnical Considerations and Vibration Impact Assessment

A comprehensive vibration impact assessment should be conducted for both construction and operational phases, accounting for potential vibrations from increased heavy vehicle traffic anticipated during the operational phase. Geotechnical studies

[2] Syposz, M., Padget, O., Willis, J., Van Doren, B. M., Gillies, N., Fayet, A. L., ... & Guilford, T. (2021). Avoidance of different durations, colours and intensities of artificial light by adult seabirds. Scientific Reports, 11(1), 18941.
[3] Crymble, J., Mula-Laguna, J., Austad, M., Borg, J. J., Sultana, J., Barbara, N., ... & Metzger, B. (2020). Identifying light-induced grounding hotspots for Maltese seabirds.

relevant to the site and its area of influence are also needed, especially due to the presence of the Għar Ħasan cave system nearby. These studies should address land stability, stability of cliff faces, fissures, weak points, and any other factors affecting risks associated with the proposed development, including those linked to heavy vehicle traffic and excavation activities.

Traffic Impact Assessment

A thorough traffic impact assessment is required for both the construction and operational phases due to the anticipated increase in heavy vehicle traffic. Traffic routes should be outlined and a capping of vehicular access to the site should be identified in order to minimise the impact of vibration, particularly in relation to the Għar Ħasan area, which is highlighted in the Malta South Local Plan as a site where heavy vehicle traffic should be minimised due to its scientific significance. Għar Ħasan is also designated as a Site of Archaeological and Geological Importance in the Ħal Far Policy Map.

Noise Modelling for Construction and Operation Phases

Noise pollution assessments should be conducted, particularly due to the potential impact on surrounding Natura 2000 sites and shearwater colonies. Noise modelling would help determine acceptable noise thresholds, especially for equipment used on the waste management floors, and outline mitigation measures like sound barriers or equipment silencers.

Emissions Study and Dispersion Patterns

A state-of-the-art emissions study and air dispersion model should be conducted to identify potential receptor sites for aerial pollutants, if any, as well as their impacts and mitigation strategies. These sites may either be found in close proximity to the facility and/or may extend to areas hundreds of meters away. A comparison of the best available technologies for emissions abatement should be included, with clear justification for the selected technology.

Final Comments

A monitoring and reporting framework should be established through the EIA to ensure that all mitigation measures are consistently implemented and remain effective over time. This framework should include regular assessments of noise, vibration, light levels, and pollutant concentrations during both construction and operational phases.