



BirdLife Malta submission for the extension to the existing sewage treatment plant (Ċumnija, Mellieħa) (PA/00569/25)

1st August 2025

BirdLife Malta welcomes the proposed extension of the Ċumnija sewage treatment plant, recognising it as a nationally significant infrastructural upgrade intended to meet the increasing treatment capacity required to serve the growing resident and tourist populations in the North of Malta, particularly during the peak summer months. We also acknowledge that the project will result in an increase in the production of new water, a valuable resource that greatly benefits local farmers.

Notwithstanding the above, we are concerned that the expansion will result in the permanent loss of approximately 6,500 sq.m of undeveloped land, of which around 1,400 sq.m consists of fertile, actively cultivated agricultural land. It is of concern that a project expected to benefit farmers will simultaneously lead to the loss of productive agricultural land. We urge the competent authorities to reassess the site footprint and explore all possible alternatives to avoid or minimise this impact. In the current context of food security and climate resilience, Malta cannot afford further loss of fertile agricultural land.

BirdLife Malta also notes from the Appropriate Assessment (AA) that the increased availability of new water in the area and the resulting reduced reliance on groundwater are expected to provide indirect ecological benefits to nearby protected areas, particularly the Għadira wetland which depends on freshwater input. In addition to this, the new water generation could also provide further benefits to the natural heritage of the surrounding areas of the site, including the Għadira wetland.

In view of this, as the managing organisation of Għadira Nature Reserve, which forms part of the Inħawi ta' l-Għadira protected area (MT0000015) located within the Area of Influence (AOI) of the proposed plant, BirdLife Malta would like to formally register its interest in closely following this application. We will continue to evaluate its potential environmental impacts as well as any benefits arising from its construction and operation.

Further comments and concerns on the proposed sewage treatment plant include:

- A state-of-the-art pest control system must be installed and maintained on site, given the significant threat rodents pose to the breeding populations of *Puffinus yelkouan* (Yelkouan Shearwater) present within the AOI. Rodents are predators



which prey on the eggs and chicks of *P. yelkouan* and BirdLife Malta has been implementing biosecurity measures in the area for almost a decade to safeguard seabird colonies from this threat.

- No exterior lighting should be installed due to the proximity of the *P. yelkouan* colony. Where lighting is unavoidable, it should be sensor-operated, and ERA's 'Guidelines for the Reduction of Light Pollution in the Maltese Islands' as well as BirdLife Malta's 'Guidelines for Ecologically Responsible Lighting' must be followed¹¹.
- Construction and operational staff should be trained to handle grounded seabird fledglings, which are likely to occur due to the site's proximity to the colony. As noted in the AA, grounded individuals that are not recovered and released are at high risk of mortality.
- In the event of emergency or 24/7 works during night time, as referenced in the AA, BirdLife Malta should be notified in advance due to the sensitivity of the site.
- Air emissions were identified as a major adverse impact in the Project Description Statement (PDS), but were insufficiently addressed in the AA. Given the anticipated increase in treatment capacity and associated emissions, it is imperative that state-of-the-art abatement technologies are installed. The competent authorities should provide a comparative assessment of the best available technologies and justify the selection made.

In conclusion, we trust that our concerns and comments will be duly taken into consideration. While BirdLife Malta does not oppose the expansion of the Ġumrija Sewage Treatment Plant, we request to be kept informed throughout the development phases of this application. We also remain at your disposal to provide recommendations on reducing potential impacts and maximising the benefits that can be achieved from this development.

¹¹ <https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf>

<https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>