BirdLife Malta feedback to the Environmental Impact Assessment Report for PA/04863/22

30th September 2025

In response to the public consultation on the Environmental Impact Assessment (EIA) for the proposed construction of a Material Recovery Facility (MRF) at the ECOHIVE complex, BirdLife Malta presents the following feedback and recommendations.

Change in Land Use

The site footprint is expected to take up 21,373 sq.m in total. Whilst it is acknowledged that downscaling might not feasible, the alternatives have not been explored and presented in detail. The site footprint will significantly impact land use, yet effective and detailed mitigation and compensatory measures are not presented. It's recommended to evaluate the site footprint and propose methods to minimise, avoid, or compensate for the land use impact. For example, the 5,500m^2 for manoeuvring and access of vehicles is not properly justified and alternatives to this are not explored in detail. Restoration of disturbed land and restoration and construction of new rubble walls in the Area of Influence should be considered as compensatory measures to compensate for the loss of habitats.

Landscaping

Whilst landscaping is proposed with a list of the trees to be planed, such landscaping merits further planning to compensate for the lost dense cover of low-lying trees and remnants of local maquis/advanced garigue community, which provide important habitats for avifauna and other fauna. To re-introduce bird species in areas where human impact increases, human involvement in the form of altering urban structures and incorporating bird-friendly infrastructure is necessary. The MRF facility will displace the habitat that the abandoned and undisturbed land offered to vertebrate fauna and will naturally increase human impact in the area.

Bird-friendly landscaping should be composed of layered vegetation with various heights and structures, such as tall trees, understory trees, shrubs, and ground cover. This type of landscape provides a range of nesting sites, perches, and hiding spots for birds. However, care should be taken, as incorporating vegetation in an urbanised area may expose birds to predators such as cats. Throughout the operational phase of the recycling facility, care should be taken to minimise the risk of a cat colony being

established on site. In addition, surrounding vegetation near buildings can be reflected through the glass, resulting in bird strikes. A moderate approach to placement lies in planting vegetation further away from buildings. In addition, glass adjacent to the vegetation should have protection for birds.

Green roofs and walls which add value for birds may also be installed. Well-designed green roofs and roof gardens can become functional ecosystems, providing food and nest sites for birds. However, adapting green spaces onto the roofs of buildings themselves can reorient the direction of bird attraction and increase the risk of bird strikes. Glass adjacent to these features should also have protection for birds.

Bird Friendly Infrastructure

The MRF facility, will be surrounded by open spaces and vegetation and will inevitably attract birds, increasing the risk of collisions with any reflective surfaces of the infrastructure. Glass that reflects nearby shrubs and trees significantly raises the likelihood of bird strikes, underscoring the importance of thoughtful design to safeguard avifauna.

The two main ways how glass protection against bird strikes can be incorporated are by installing glass panels with a frit pattern and placing glass behind some type of screening. Research has shown that patterns covering as little as 5% of the total glass surface can deter 90% of strikes. Most birds will not attempt to fly through horizontal spaces less than 2 inches high nor through vertical spaces 4 inches wide or less. This concept is known as the 2" x 4" Rule[1].

It is duly noted that in the EIA, it is suggested that the loss of breeding habitats of *Monticola solitarius*, the Blue Rock Trush, and *Passer hispaniolensis*, the Spanish Sparrow, can be partially reversed by the installation of breeding facilities such as nest boxes at the buildings of the proposed development.

In this regard, we would like to highlight that when installing a nest box, it's essential to choose a design tailored to specific bird species you wish to attract. Different species have different requirements for entrance hole size, box dimensions, and mounting height. BirdLife Malta remains available to assist in designing nest boxes and placing them in correct places. The nest box must be installed in a location that is safe from predators, has some shade, and is within the preferred habitat of the target bird species, and is not located nearby a well-used path. To ensure the health of its inhabitants, nest boxes must be cleaned regularly for proper sanitation and prevent the

[1] Sheppard, C. (2012). Resource Guide for Bird-friendly Building Design. American Bird Conservancy. https://abcbirds.org/wp-content/uploads/2015/05/Bird-friendly-Building-Guide_LINKS.pdf.

establishment of parasites within the structure. It must be ensured that the birds have a clear flight path to the nest without any clutter directly in front of the entrance. The nest box must also be slightly bent forward so that any rain hitting the roof bounces off.

To facilitate breeding opportunities for the Blue Rock Thrush within the site, it is recommended that small openings to the outside are incorporated into any service rooms that will be infrequently used by staff. Such openings would provide access for birds, including the Blue Rock Thrush, to utilise these sheltered spaces for nesting and breeding purposes.

Sylvia melanocephala, the Sardinian Warbler, which was also recorded within the Area of Influence, typically nests in low-lying shrubs, within 80cm from the ground in low shrub. Therefore, we recommend that native low-lying bushes such as Spurge species (*Euphorbia* spp.) are included in the landscaping.

A bird bath is another excellent way to attract diverse bird species and provide them with essential fresh water, particularly during dry summer days. It offers birds a place to drink and bathe, helping maintain their feathers. Bird baths should have a shallow basin with a textured surface around the basin for traction. Bird baths should be regularly cleaned and refilled with chlorine-free water to ensure they remain a safe resource and must be placed among vegetation but away from windows to reduce the risk of collisions.

Lighting and Operational Times

During construction and operational phases, minimising light pollution is crucial due to its adverse environmental effects, such as bird disorientation and grounding. No extra light spillage is afforded along the coast and near Natura 2000 sites (MT0000007, MT0000008, MT0000105, MT0000112), considering the existing heavy light pollution in the Mağtab area, particularly along Tul Il-Kosta. Consulting ERA's 'Guidelines for Reduction of Light Pollution in the Maltese Islands' and BirdLife Malta's 'Guidelines for Ecologically Responsible Lighting' is recommended[2].

Whilst it is noted that nighttime activities are not being planned, we would like to further stress that nighttime activities utilising external lighting should not occur between June

[2] Crymble, J. (2021). GUIDELINES FOR ECOLOGICALLY RESPONSIBLE LIGHTING. BirdLife Malta. https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf.

and November given that these months coincide with the fledging season of the Yelkouan and Scopoli's shearwater, where the risk of light-induced grounding is higher[3].

Biosecurity

A state-of-the-art biosecurity plan is expected for the site. We anticipate efficient rodent control in outdoor areas to aid in keeping rodent populations at a minimum. Rodents are one of the biggest threats for nesting seabirds on the Maltese islands and BirdLife Malta is continuously working on maintaining good biosecurity for the protection of nesting sites. While we support the implementation of an efficient pest control system on site, we would like to highlight the importance of incorporating ecological considerations into the pest control activities carried out during the operational phase of the project.

The use of pest control devices such as sticky insect tape and glue traps for rodents can have harmful impacts on wildlife. These devices inadvertently capture various insects that are essential food sources for birds and other fauna on-site. Additionally, birds and other animals, such as lizards and hedgehogs, may become trapped, leading to injury or death.

For controlling rats and rodents, we recommend using devices like GoodNature E2 traps and toxic blocks housed within closed bait stations. These alternatives are designed to be inaccessible to non-target species, making them a more environmentally responsible choice compared to glue traps.

Noise and Dust Protection

It is acknowledged that adherence to best practice procedures to keep noise pollution and dust production and dispersal at the construction site at a minimum is highlighted in the EIA. Nonetheless, details on the best practices are lacking. Dust suppression techniques should be a focus for reducing levels of dust generation including spraying water on dirt roads and reducing vehicle speed along such roads. Trampling on surrounding land by heavy machinery used during construction should be kept to a minimum and mitigation measures clearly stated such as clearly marking access routes.

[3] Crymble, J., Mula-Laguna, J., Austad, M., *et al.* (2020). Identifying light-induced grounding hotspots for Maltese seabirds. 2020.