



BirdLife Malta feedback to 'Public consultation in relation to the Terms of Reference for an Environmental Impact Assessment for PA/05888/25'

09/08/2026

BirdLife Malta has evaluated the prepared Project Description Statement (PDS) for the proposed extension of the Paradise Bay Resort and would like to contribute to the public consultation process regarding the Terms of Reference (ToRs) for the Environmental Impact Assessment (EIA).

Judging by the scale of the proposed hotel, the number of people it is expected to accommodate, and its immediate proximity to the sea, a number of potential negative impacts on the environment can be expected. Consequently, we recommend that the following criteria and considerations are included within the EIA for the proposed development.

1. Ecological Assessment

We strongly recommend conducting an ecological survey, including that of avifauna, to determine the species which make use of the site and its immediate surroundings and which therefore might be affected by the demolition and construction phases of the project.

The development site borders three Natura 2000 sites:

- MT0000112: Żona fil-Baħar madwar Ghawdex
- MT0000105: Żona fil-Baħar bejn Il-Ponta ta' San Dimitri (Ghawdex) u Il-Qaliet
- MT0000024: Rđumijiet ta' Malta: Ir-Ramla taċ-Ċirkewwa sal-Ponta ta' Bengħisa
Rđumijiet ta' Malta: Ir-Ramla taċ-Ċirkewwa sal-Ponta ta' Bengħisa

The development also lies in the area of influence of important seabird colonies¹:

- **Kemunett** hosts a colony of *Puffinus yelkouan*, the Yelkouan Shearwater (Granija). A total 85-125 breeding pairs have been recorded in this colony.
- **Ras in-Newwiela (Sannat, Gozo)** hosts around 45-70 breeding pairs of *P. yelkouan* and 20-51 breeding pairs of *Calonectris diomedea*, Scopoli's Shearwater (Ċiefa).

¹ BirdLife Malta (2021). SEABIRD FIELDWORK REPORT 2021. <https://era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf>.



- **Ta' Ċenċ (Gozo)** hosts around 900-1,400 breeding pairs of *C. diomedea* and 150-300 breeding pairs of *P. yelkouan*

BirdLife Malta has also detected, using infrared cameras, the presence of *P. yelkouan* rafts in front of the Qammieħ Cliffs, which lie immediately across from the development site.

This means that impacts arising from the development could pose a risk to these Annex I seabird species, particularly through light and noise pollution. In this regard, demolition and construction works should not be undertaken during the night, as such activities may pose a risk to these species.

Additionally, workers on site should be made aware of the presence of these seabird species, particularly given that strandings and collisions may occur. If stranded seabirds are found on site, they should immediately be removed from danger and placed in a ventilated cardboard box, and the BirdLife Malta rehabilitation team and the Police Environment Protection Unit should be contacted for assistance.

2. Noise Assessment

A noise and vibration study should evaluate the impacts on sensitive receptors during the demolition and construction phases, while also taking into account that the planned works are expected to last a number of years.

At the same time, given the nature of the proposed project, we recommend assessing the impacts of increased noise levels during the operational phase, including noise arising from the movement of vehicles and loud music from entertainment establishments.

3. Lighting Scheme

We recommend that the external lighting scheme and its potential implications for the natural environment are thoroughly evaluated.

The proposed development is highly likely to become a source of light pollution if the lighting scheme is designed without attention to the respective guidelines. Illumination of the construction site should be kept to minimum levels necessary for safety reasons and no lights should be faced seawards. It is important to carry out all the demolition/construction works only during daylight hours. The limitation to lighting on site should also apply to the construction phase of the project, as it is often the case that large spotlights are left on continuously at construction sights, and from our experience in past years these are often the cause of seabird groundings.



Lighting should be focused only on essential areas, minimising spillover into ecologically sensitive areas. These measures are critical to mitigating the effects of Artificial Light at Night (ALAN), which disrupts nocturnal behaviours and can lead to the loss of light-sensitive species in areas with persistent illumination. A recent study showed that ALAN in Ċirkewwa Harbour disrupted marine biodiversity, altering species behaviours and predator-prey dynamics².

We would also like to take this opportunity to recommend that any external lighting fixtures be designed in accordance with internationally and nationally recognised guidelines for environmentally sensitive lighting. Designing an ecologically sensitive lighting plan would benefit both wildlife and human health, as such lighting can reduce disturbance and create a calming environment. In this regard, we suggest consulting BirdLife Malta's *Guidelines for Ecologically Responsible Lighting* as well as the Environment and Resources Authority's *Guidelines for the Reduction of Light Pollution in the Maltese Islands*³

In general, ecologically-sensitive external luminaires must:

- Be fully downward-facing;
- Be full cut-off fixtures, ensuring an Upward Light Output Ratio (ULOR) of 0%;
- Be limited to the minimum number of fixtures and the lowest possible light intensity; and
- Colour temperature not exceed 2200 K.

4. Collision Risk Mitigation

Bird collisions with glass are a major cause of bird mortality. Birds often mistake reflective or transparent glass for open space or vegetation, leading to fatal impacts - even with relatively small windows. This risk affects a wide range of species, including migratory birds, fledglings, and healthy breeding adults, making it particularly harmful at the population level. The proposed hotel building is expected to have a risk to bird collisions, especially the top two floors which shall have glass balcony doors without setbacks and facing open spaces, as well as lower levels facing any vegetation from the landscaped areas on site.

Integrating bird-friendly design into construction can significantly reduce these risks, often through cost-neutral measures. The type of glass used is critical: mirrored glass is especially hazardous because it reflects surrounding habitats, while tinted or low-

² Grillo, F., Marrone, A., Gauci, A., & Deidun, A. (2024). Maltese Coastline Never Sleeps: The Effects of Artificial Light at Night (ALAN) on the Local Infralittoral Assemblages—A Case Study. *Journal of Marine Science and Engineering*, 12(9), 1602.

³ <https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>
<https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf>



reflection glass provides only limited improvement. Effective solutions include the use of patterned (fritted) glass, where even minimal coverage - around 5% of the surface - can prevent most collisions. This works because birds avoid flying through small gaps, following a widely recognised 2x4 rule. Research on human vision shows a striking ability to complete partial images in order to compensate for missing visual information. This linking of visual fragments and filling-in by our brains means it is possible to design patterns on windows that alert birds to a barrier while minimally impacting views out¹.

Another effective approach is to position glass behind external screening elements such as grilles, netting, shutters, or shading devices. These features can be integrated into building design as decorative façades, improving both safety and aesthetics. In addition to reducing bird strikes, such measures can lower solar heat gain and contribute to more sustainable building performance. Overall, incorporating bird-friendly features into architectural design is a practical and impactful way to protect birdlife while maintaining functionality and visual quality.

For further guidelines on bird-friendly glass designs we recommend consulting 'Bird-friendly building with glass and light' published by the Swiss Ornithological Institute⁴.

The tower cranes that will be installed during construction may also increase the risk of bird collisions. The EIA should therefore assess the collision risk posed by tower cranes, including during nocturnal migration, and identify appropriate mitigation measures for crane visibility and lighting. High-visibility markers on tower crane structures can increase their visibility to nocturnal birds, particularly given the presence of the Annex I Yelkouan Shearwater and Scopoli's Shearwater in the vicinity. In addition, the installation of bright white LEDs on these structures should be avoided, as these may further exacerbate the risk of bird collisions. Instead, red lighting should be used to mark the cranes and improve their visibility.

5. Traffic Impact Statement

The expected increase in the number of accommodation rooms, which is almost double the existing number, is likely to significantly increase the number of vehicles accessing the site.

For this reason, it is important that a Traffic Impact Statement is compiled to carefully evaluate the consequences and risks associated with increased traffic and to establish a sustainable approach to managing these impacts in relation to the existing road infrastructure, particularly considering that this is the main route to and from Gozo.

6. Handling and transportation of Construction Waste Through the Sea

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https://www.lbv.de/files/user_upload/Dokumente/Projektberichte_Projektskizzen/Vogelschlag/Glasbrosc_huere%202023_231114_download_%20E.pdf



Almost 130,000 m³ of construction waste, including stone, rock, concrete and bricks, is expected to be generated on site during the demolition and construction phases.

A Waste Management Plan should therefore be drafted and appropriately evaluated to ensure that as little waste as possible ends up in landfill, that no uncontrolled discarding takes place, and that the most appropriate routes are selected for transporting the waste.

It is expected that construction waste will be transported by land and/or sea.

Waste management during the operational phase should also be given special attention, with biosecurity measures incorporated to avoid an increase in the presence of pest and rodent species on site.

The risks of adverse impacts on the marine environment, including increased turbidity resulting from dust and the release or leakage of other pollutants, and the consequent impacts on protected habitats and species, should be assessed, particularly given the presence of marine Natura 2000 sites surrounding the development site.

Special care should be taken to prevent the deposition of dust and construction waste into the sea, which can severely impact *P. oceanica* meadows found in the immediate surrounding marine areas.

To mitigate sediment suspension during construction, the installation of silt curtains should not be regarded as an absolute solution, as under certain conditions silt curtains may be ineffective. Sediment suspension can increase turbidity, posing a significant threat to the health of *P. oceanica* meadows.

Continuous monitoring of turbidity levels should therefore take place throughout the construction period, with works suspended during unfavourable conditions that could result in significant sediment dispersion.

It is essential to establish a turbidity limit and ensure regular environmental monitoring by local experts in order to safeguard the marine environment.

7. Increased Visitor Pressure

The increase in the number of hotel rooms is expected to result in increased visitor pressure on the surrounding coastal and marine areas.

This impact should be assessed, and the developers should be required to address it by incorporating responsible tourism principles into their operational standards.

To mitigate pressures on the surrounding natural environment, guests should be provided with sufficient information and appropriate signage explaining how to respect the surrounding environment, including measures to reduce littering and trampling, disturbance through light and noise, and information on protected species found in the area.

