

The Green Whistleblower

Clarification



This site in Mgarr, Malta, once pristine garigue, is crying out for direct action after topsoil was removed from the site and heavy machinery took its place. ECF 562/05 was issued on July 11, 2005, for dumping on garigue and parking of vehicles. Will the site be restored at the developer's expense?

My attention has been drawn to some of the EIA review comments carried in my last column (September 16), namely:

"The usual suite of invertebrates, mainly insects and molluscs... no attempt was made to identify these since, in the main, they consisted of ubiquitous species" - one should note that some insect and mollusc species are listed in the Red Data Book for the Maltese Islands in view of their restricted distribution, etc., and some are also consequently protected by virtue of local and/or regional legislation. Also, no exhaustive faunal surveys were conducted on site, with surveyors limiting themselves to "records of Western whipsnake and unidentified geckos". Prima facie, this ecological appraisal appears to be slipshod and incomplete.

No description of the impact of the generation of particulate matter on marine filter-feeding organisms is included.

These comments were not judicious and fair to the relevant experts contributing to the EIA report. After going through the massive report once again, it transpired that some of the volumes pertaining to it were not in Nature Trust's possession at the time of the EIA review since they were dispatched to other NGOs for their review (despite all six reports having been received by the NGO in good order).

In fact, specifically in Appendix Volume 1 Report 9, an exhaustive survey of all insect, mollusc and reptile species is provided by the consultants. Hence, I feel I must withdraw the comment that "this ecological appraisal is slipshod and incomplete". While very little is articulated on the impact of particulate matter on marine filter-feeders, other aspects of the impact of such material on marine life are discussed in detail in Appendix 2 Volume 2 Report 1.

However, this point gives me the cue for a further one - even if all the volumes of the report had been in Nature Trust's possession at the time of writing, the few weeks which MEPA gave NGOs to go through the massive report in several volumes, would not have been enough.

Hence, the lacunae in the EIA review submitted by Nature Trust were bound to recur - in addition, the main report/s (dubbed 'Integrated Co-ordinated Report') of the EIA review should include all salient conclusions arrived at by the EIA consultants and included in the relevant appendices, and not just a selection of these, to allow even the cursory reviewer to grasp all the tenets of the full report. Such an onus lies with the EIA co-ordinator, who is responsible for compiling such a report, and not with the individual consultants.

Some 'vultures' were quick to misinterpret this unfortunate predicament as a premeditated attempt by Nature Trust and myself to smear the reputation of some of the competent consultants who authored the report.

Such vultures lurk in the shadows since they fail to speak their minds in public but rather resort to a whispering campaign. These are the same individuals who continuously view what others

do with suspicion, and cannot distinguish between individuals with a genuine love for nature and those with a vested financial interest.

This strengthens the Nature Trust's proposal to the Ministry for Rural Affairs and the Environment (MRAE) that funds should be allocated to NGOs involved in EIA reviews. Only thus can it be ensured that NGOs reviews of EIA reports reach a certain standard since, to date, these depend upon a few volunteers who are not always available, especially in summer.

Strangely enough, the proposal did not gain the support of some other NGOs - however it is hoped MRAE will see its reasonableness and act accordingly.

Hondoq concerns

The following is a continuation of the concerns expressed by Nature Trust in connection with the Hondoq ir-Rummiën project Environmental Impact Assessment. I hope that such a review is met with some constructive feedback, rather than criticism.

Employment figures projected in the Farrugia Report are highly speculative. For example, it lists 1,980 jobs for hotel operations after the 11th year, by which time the local and regional tourism scenario might have changed drastically.

Analogies with other Gozo-based hotels show that five-star accommodation is not necessarily also in demand. Also, how was it calculated that there would be 182 jobs at the commercial centre? This is detached from any major residential area; hence, it is difficult to assign such a high figure to this centre.

Excluding the 50 jobs to be generated by the marina operations (and these will be fully available only after the 11th year), all other jobs (e.g. in the construction sector) will be terminated after the fifth year.

It has been admitted that the "supply for residences is much greater than demand". So why is there a need for 200 units? Within the same section, it is 'unlikely' that manpower would need to be imported. This does not sound very convincing.

Again, by self-admission, current demand for five-star hotel accommodation is weak and the proposed development will not help in this respect (those in favour of the project rebut this by saying that the 'hotel is part of an integrated project unique to Gozo') and mentions San Lawrenz and Ta' Cenc as other five-star properties in Gozo, without saying that part of San Lawrenz has been converted into apartments.

The same section states that cash flow is expected to be positive only after the seventh year, with a negative cash flow in the first four years. This raises doubts over the feasibility of the project.

Additional concerns include:

No guarantees (especially financial ones) to preclude the project's future expansion to the west and east of the delineated footprint, since this land is also owned by Gozo Prestige Holidays.

The preamble refers to the number of berths in France and Spain, two hot spots of coastal urbanisation, where a large percentage of the brown algae *Cystoseira* spp has been lost.

'Win-win' scenarios are frequently referred to in the report (e.g. preamble, p. 8). This would involve filling in the disused quarry and its development into an ecotourism venture (such as has been done with Limestone Heritage, Siggiewi) with no need to develop a yacht marina or other tourism development. Such infilling is no longer subject to an EIA, by virtue of recent amendments to EIA regulations.

The report claims that the swimmers' zone will be extended. There is no need for this, since a simple safeguard of the existing zone would suffice.

It also states the "bathing area will be protected from boats". Physically it will be, but how can anti-fouling paint, oil and other discharge fail to get into the bathing area? Will marina operators allow access only to boats certified to use prescribed anti-fouling paints for example?

The marina will cater for five berthing spaces for boats up to 45 metres. Their size itself would cause congestion in the immediate vicinity of the marina and their engines can churn up fine particles from the benthos in shallow areas.

Moreover, the financial feasibility is worked out on many assumptions, namely: (a) price of real estate (this might stall in the future); (b) sustained demand by locals; and (c) sustained demand from foreigners. How can one confidently state that 'the turn-over expected is adequate'?

In Chapter 4, the results of two different surveys are reported (a Three Villages survey and an All Gozo Survey) but no reference is made to the referendum held for Qala residents by the local council, despite the fact that this village has a vested interest in any decision.

It is not stated who conducted these surveys. The way survey results are reported is also flawed - e.g. "of the village residents, just 38.9 per cent said they disliked the marina". Does this mean that 61.1 per cent of respondents favour the marina? What about respondents who declined to answer or were non-committal? Such statistics are rarely provided in the report.

No lessons learned at Marsaxlokk

No lessons seem to have been learned from the carob-cutting streak at Ras il-Wied, Triq Zejtun, Marsaxlokk, where, after the granting of PA 06634/04 and PA 3495/04 (tacitly approved despite recommendations for refusal), a number of permit conditions were breached. This led to a number of mature carobs being sheared off, rubble wall parts of the former building being demolished, and illegal excavation. Enforcement Notice ECF00489/04 was duly issued, but the development was still sanctioned at a later stage.

To make matters worse, a new application, literally a few metres down the same road, has been submitted. PA 07520/05 says "additions and alterations to existing residence" will be made.

However, the application also includes the construction of a swimming pool with ancillary facilities, which is ominously reminiscent of the previous two applications.

It seems that developers have honed their application-drafting skills quite well. One hopes that MEPA is more vigilant this time round, and will clamp down relentlessly on any infringement on the site, especially where protected mature trees, rubble walls and ODZ footprints are concerned.

alan.deidun@um.edu.mt alpra1@mail.global.net.mt