

# The Green Whistleblower

## A green pledge by the Bishop



Ta' Pinu - this aerial shot of Ta' Pinu Sanctuary in Gharb, Gozo, bears testimony to the rural ambience surrounding the same sanctuary. Hence, the recent preposterous applications for a significant increase in the built-up footprint should be refused by MEPA. The onus should be on the Gozo Curia to withdraw such applications, especially in view of the Gozo Bishop's recent pledge to respect the environment. Photo courtesy of [www.maltavista.net](http://www.maltavista.net) .

One appreciates last month's missive by the Gozo Bishop in a pastoral letter that the Church is committed to safeguarding the environmental heritage of the island. However, it is difficult to reconcile such a statement with the Bishop's complaint in the same letter that the Gozo Diocese was being discriminated against by MEPA when it came to development permits and when the diocese is repeatedly applying for permits within ODZ areas.

Hence, the sacrosanct question: what exactly does the environmental heritage the bishop is referring to constitute, since areas of high landscape value, ridges, ecologically sensitive sites, rural settings and fields, fruit trees and the lot are considered to be expendable?

The bishop can rest assured that environmentalists object to tourist developments with the same attrition as Church-related projects - there are no hidden anti-clerical agendas here - and they will be the first to laud the Gozo Diocese when positive steps are taken, such as the setting up of an Environment Commission (which would compensate for the current spineless stance taken by the Gozo Curia when it comes to mega projects, such as Ramla I-Hamra, Ta' Cenc and Hondqoq ir-Rummien), or the dropping of plans for ODZ projects in favour of within scheme ones.

Only then will the Gozo Diocese live up to the green credentials it professes. The Ta' Pinu Sanctuary, Cittadella, Xaghra and Nadur cemetery proposals were not objectionable since "some people were arguing that they are an environmental disaster", as the bishop puts it, but for the ironclad considerations.

For once, this column must echo statements made by Gozo Minister Giovanna Debono, who said that environmental disasters are wrong, immaterial of who the applicant was. If there are no spiritual hurdles to crematoria, why doesn't the Church explore their potential rather than invest in lavish cemeteries set out in the most picturesque of environs.

The Gozo Curia should also not decouple the lamented decline in vocations, faith and overall trust in the Church from its own planning applications - when one considers the tide of newspaper letters denouncing plans for the Nadur cemetery, one soon realises that the Church must first spruce up its environmental image before it can regain any moral high ground with the public.

### Ta' Cenc fracas

Whole reams of chagrin have appeared in the local press in connection with the Ta' Cenc proposals, emblematic of the distrust in the public of the current proposals, despite the developer's campaign to win over hearts and minds.

The only individuals who seem to stick their necks out for the developer are the GRTU, GTA and the developer's employees, the only entities who are set to benefit directly from the project, at least in the short term (if the project is approved, and once construction works are ready, will

the developer's workers view him with such adulation at becoming suddenly redundant? - analogy: Hilton development).

After reports that a few MEPA board members were allegedly involved in meetings with developers on separate cases, it seems that the authority is striving to avoid any further besmirching of its reputation by requesting the developer to omit any reference to 'private meetings' in the final report - this should be lauded as a positive development, although such meetings and 'understandings' should not be held in the first place. The developers even had the cheek to rebut that this is tantamount to censorship.

We are all familiar with the lengths to which local developers resort to in ushering in their projects - hence, we should not be impressed if the Ta' Cenc proponents are arguing that the Mgarr ix-Xini kantra, earmarked for over 30 villas, is in the vicinity of the existing hotel, since otherwise 'immediate vicinity' or 'near' would be used.

Contrary to what was reported in The Times following the Ta' Cenc bogus public hearing, the Mgarr ix-Xini area is a full one hour's walk from the hotel (1.5 km) and not just a few minutes away. According to such reasoning, then, Birzebbuga and Marfa must be 'not too distant'. Only snag is that the island measures 15 km by 9 km, such that no two locations are 'distant' from each other, according to the terminology applied by the UK authors of the Structure Plan.

If Mgarr ix-Xini is deemed close to the hotel, what about the elusive Zone 7, comprising almost 25 per cent of the total Ta' Cenc area, and which conveniently has been left out of the current EIA, and almost abuts on the existing hotel?

Are we to wait with baited breath for more residences to be announced for the area? Is the developer waiting for the outcome of the next elections to announce his plans? Can the Opposition pronounce itself on eventual golfing plans for Zone 7?

If a particular placard in an environmental march held in Valletta last year rightly raised a hornet's nest, then the developer's allusion to being able to obtain permits for his development, had he enough villas, should raise a veritable tornado. Strangely enough, such an allusion barely caused a murmur of dissent in Parliament.

The developer also claims that he cleared the area of hunters and trappers. While one uses the eviction of trappers and hunters from one's own property as leverage to promote his application, not all trappers have been evicted from the site.

What about the trapper/hunter permanently lodged along the cliff edge right in front of the hotel, and whose rubble wall obstructs ramblers proceeding towards Ta' Sanap and Ta' Seguna? A photo of this site is included.

## **Hondoq ir-Rummien concerns**

The Hondoq ir-Rummien EIA proposals, for which the public submitted comments by the end of last June, is overtly biased in favour of the development:

- Document downplays reclamation of 1,500 metres of coastline;
- "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". A prima facie, this ecological appraisal is slipshod and incomplete;
- No description of the impact of the generation of particulate matter on marine filter-feeding organisms is included;
- The following statement found in the same section of the report is especially opinionated: "These two fears (i.e. the deposition of particulates in water column would disrupt the feeding processes of shoreline invertebrates and may damage sessile ones and would mechanically increase turbidity and interfere with aesthetics, feeding, locomotion and gas exchange in organisms and with beach sediment budget) are unfounded, since, with the measures taken, particulate matter will not enter the water column."
- The same section also speaks about redistribution of particulate materials in water columns such that it exerts only an insignificant impact on biodiversity. Have any ad hoc studies on settling rates of part matter in the water column been carried out?
- "Excellent buffering capacity of seawater will counteract lowered pH of effluent" - have any studies been carried out to substantiate this statement? "Nitrophilous species expected to grow in marina base but not to affect outer area." Although run-off from the marina base will be treated in settling tanks, these can't remove substances in suspension and doubts exist as to the consequences in the eventuality that such tanks are not functioning properly;
- In the same section, the "release of hot water at 26°C and of saltier water "will mainly affect marina basin" is also hard to fathom, since existing studies illustrate the effect of thermal pollution and salty effluents on seagrasses (e.g., in RO plant environs);

• "Dredging works are not likely to be very significant during the construction and/or operation of the proposed marina." Such a conclusion was arrived at through design and physical models, hence impart a low degree of confidence; and

• "The new proposal... fails to have a significant impact on the status of the waters of the bay." How can such an all-embracing statement be justified?

The site earmarked for the project enjoys very good bathing water quality, as testified by the fact that levels of TSS, chlorophyll a, dissolved nitrates and phosphates and BOD recorded within the bay's waters were way below prescribed thresholds for concern, while underwater visibility was very good.

The same site is also ecologically important, as testified by:

• AoS is a Rural Conservation Area and an Area of Ecological Importance (AEI). Moreover, the GCLP proposes designation of Hondoq as a Level 2 AEI, flanked in part by Level 3 buffer zone, SSI for its geology, an AHLV, as a site with a 'Category A' valley 9 subject to RCO 29 in Structure Plan), and as a site with garigue (subject to GCLP policies GZ-RLCN-3 and GZ-RLCN-4).

• Posidonia meadows extend a short distance away from the coastline. *P. oceanica* is listed as priority habitat within Annex I of the Habitats Directive, which has been transposed in Maltese environment legislation. In addition, the same seagrass species is listed in the Red Data Book, in Schedules II and IV of LN 257 of 2003, in Annex I of the Bern Convention and in annex II of the SPABIM Protocol.

• 50-60 per cent of the Area of Influence is "predominantly sands colonised by seagrass", at times lying just 100 m away from the footprint of development (at 438280 S and 3987400 E)

• "Biocoenosis of *P. oceanica* meadows appear to be in a very good state of health, throughout the area surveyed."

• Sightings of two dolphin species (including 80-100 in Fliegu in May 2003). With a yacht marina at Hondoq, one cannot rule out frequent collisions with yachts and disturbance to cetacean passage. As aptly expounded in the Guidelines to Address, the issue of the Anthropogenic Impact of Marine Noise on Marine Mammals in the ACCOBMAS Area (2006), underwater noise (as generated by vessel propellers, for example) is a real threat to cetaceans, and sites with frequent cetacean sightings should be declared Special Areas of Conservation (SACs) or Marine Protected Areas (MPAs).

The fact that the site in question is endowed with sterling water quality and interesting ecological features renders the beach on site a prime candidate for Blue Flag status - this prospect would be jeopardised if the proposed development is given the green light.

With respect to vehicular traffic passing through Kuncizzoni hamlet (80 individuals) - 60-70 daily trucks, the report claims in the synopsis that alternative routes are still being sought (will new roads be created through a pristine area?).

Also, the promise to provide double-glazing to residents is preposterous since such a feature can maybe legislate against noise, but what about bellowing clouds of white dust and the increased traffic flows? The report is unable to address prescription of GZ-RLCN-1, relating to Areas of High Landscape Value and, in view of the statement "the costs of constructing a marina may not be justifiable against yearly income alone"; why then not dodge marina plans altogether, may we ask?

In Chapter 2, it is stated that water-borne wastes may also be already reaching Hondoq from the Ghar id-Dar quarry site - hence, the question: Why exacerbate further release of pollutants into the surrounding waters? The same chapter reports strong currents on site (ranging from 1-23 cm/s), with a predominant W and W-SW direction. Hence, any resulting plumes can reach Blue Lagoon (ca. 1.5 km away) within a few hours of spillage, allowing little leeway for contingency plans.

In Chapter 5, although one welcomes the fact that the marina area will only be opened to the outside once completed, concreted and cleaned and boulders to be used on the outside for pile curtain will be washed prior to deployment, but no use of silt curtains to mitigate against fine particulates is envisaged.

Previous projects (e.g., Portomaso, Tigné, Cirkewwa Terminal) where such curtains were not used impinged on water quality and presumably also on important habitats and species. The settling of the pile curtain is still expected to disturb the benthos, which consists mainly of medium and coarse sand.

The report goes off on a tangent when stating that "more of the existing habitats are expected to be created" (due to the submersion of artificial structures). Many studies published in literature explicitly show that harbour- and marina-related human structures are no substitute for natural habitats lost through their development. Boulder fields, which are considered as ecologically important biocoenosis, are included in the area to be obliterated.

Serious doubts exist over the veracity of the claim that rockpools can be created with careful planning and expert intervention, if appropriate sediment is removed and redeposited in existing kamenitzas.

Finally, the monitoring and management plans are just 1.5 pages long and contain no information about the periodicity/frequency of monitoring, etc.

## **Silver linings**

BoV tree-planting pledge - Bank of Valletta has launched a wide-ranging environmental initiative that will contribute towards a greener environment. Within the ambit of such an initiative, the bank will plant 50 trees in every locality in Malta and Gozo. With over 60 local councils, its aim is to plant over 3,000 trees.

Financial help for environment-friendly businesses from MEPA - MEPA has joined forces with the Austrian Federal Environment Agency (UBA) to develop a new, simplified environmental regulatory framework. This will help businesses achieve compliance with national environmental laws, while avoiding excessive administrative burdens, within a project funded by the EU Transition Facility (2004) programme. This will allow for the provision of expertise in environmental permitting systems, waste and chemicals management regulation as well as in emissions and discharges control regulation.

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