

## Comino: island of plastic



The garigue around the Blue Lagoon is draped in plastic debris of all sorts, with kiosks and visitors to Comino being the main culprits.

Following the visit by the Tara Oceans research vessel, Environment Minister Leo Brincat last Sunday rightly spoke on the dire need to address the issue of plastic. The Maltese 'disposable' mentality is such that no site on the islands, however remote, is immune from plastic pollution. In fact, the garigue overlooking the Blue Lagoon, behind the mushrooming kiosks, is peppered with plastic debris that is eventually blown further inland and ends up in the sea. Why does Comino need so many kiosks, which jar with the small island's natural context? Will this 'commercial' activity on the island further expand in the coming years? Stalls should only be permitted to offer basic refreshments, such as drinks, light snacks and ice-cream. Requests for stalls that need more space, and generate more waste (e.g. cooking oils) and noise (e.g. generators) on Comino should not be contemplated.

One alighting at Comino, a Mepa sign asks bathers to steer away from the garigue since sunbathing on this protected habitat is prohibited. Fine, but apart from the garigue, where are non-paying sunbathers expected to stay at Blue Lagoon, where beach furniture occupies every nook and cranny of the 10-metre sandy beach from the early hours of morning? Beach concessions in places where sandy stretches are in very short supply should be anathema, but in Comino, one has to negotiate one's way through a maze of beach furniture just to reach the sea.

Although the rationale for the Eco-Gozo concept is sound, it has not delivered on its various pledges as its thrust was limited to promoting renewable energy on the island, dedicating scant attention to other environmental aspects. Because Comino is so small it should be easier to implement and enforce the concept there.



The flagship measures of Eco-Comino should include: (i) a total ban on using plastic on the island by ensuring that the hotel, kiosks and boat operators use biodegradable alternatives; (ii) a ban on new development on the island – the area around the hotel at San Nicholas Bay has enough derelict land, such as the redundant volleyball courts, that can be used for expansion; (iii) a ban on all beach concessions at Blue Lagoon; (iv) treating the sewage that the bungalows discharge at Santa Marija caves; (v) restricting the number of kiosks on the island; (vi) providing personal hygiene and waste disposal facilities at the Santa Marija Bay camp site and (vii) converting the island's derelict facilities, such as the former pig farm and farm compound, into environmental education amenities.

## Opening up the countryside to even more real estate

Despite the angst expressed by environmental NGOs and the Church Environmental Commission, government has forged ahead with its revision of policies concerning Outside Development Zones (ODZs). These include so-called 'agrotourism-promoting' measures, whereby up to 10 new guest rooms, a swimming pool and extensions to existing buildings (up to an area of 200 square meters) may be developed in ODZ areas. Although capped at a total of 400 square metres, the actual total dimensions of the permitted development may be much higher if they include additional 'niche' facilities such as horse-riding, olive oil pressing, a zoo, bee-keeping or shops.

Proponents of the new ODZ policies point to provisions to prevent abuse. These include a public deed that applicants need to enter into to prevent the separation of the development's accommodation and farming aspects; a provision whereby if structures are not used for a consecutive three years they are to be demolished at the applicant's expense; and the fact that only an estimated 111 farmers own the mandatory 60 tumoli of land to be shortlisted for such developments.

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However, does the Malta Environment and Planning Authority have the resources to take on this additional monitoring commitment, given that its enforcement capacities are already stretched? In view of how rare it is for structures in Malta to be demolished and not replaced, I cannot fathom how Mepa will actually impose such demolition without being embroiled in lengthy legal battles with the applicant, with endless prohibitory injunctions on the cards.

Four other unsavoury aspects of the retrograde ODZ policy changes include the fact that (i) structures built prior to 1978 will be sanctioned and even allowed to apply for a permit (originally the cut-off date in the draft policy issued last October was a more stringent 1967); (ii) Level 1 and 2 scheduled areas, originally ruled out for agrotourism, can still host such development, unless "the necessary environmental assessment" (who will conduct the 'necessary assessment' if not Mepa itself?) shows that the scheduling characteristics of the site are being compromised. This opens up the possibility of such sensitive areas being encroached upon instead of being considered sacred; (iii) even non-farmers can apply for such development, provided they form part of a consortium comprising farmers, and (iv) a third of the eligible farmers are in Gozo, which has some of the Maltese islands' most unspoilt rural landscapes.

I once again call for a feasibility study on the actual demand for agrotourism facilities in Malta. Such a study should have been conducted prior to such measures having been breezed through, especially when we have Sicily, a doyen of agrotourism, on our doorstep. With space in Malta in such short supply, we cannot afford to raise visitors' expectations in potential agrotourism, since we simply cannot provide them with the facilities they would find in Sicily and elsewhere. Tourists can easily use existing facilities in selected farms (one of the core activities of ecotourism) without the need to pave the way for a further building boom in the countryside.

The upshot of the new legislation is that, effectively, development boundaries have again been extended and relaxed, as happened in 2006, albeit in a surreptitious manner this time round, primarily not to raise the ire and heckles of environmentalists. One wonders how the policy changes will affect Natura 2000 sites, with some already harbouring extensive agricultural activities.