

# MEPA's comments on the SEA Scoping Report for Malta's National Transport Strategy and the National Transport Master Plan

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## 1. Introduction

- 1.1 MEPA notes that an SEA will be carried out for the National Transport Strategy and the National Transport Master Plan, in line with the Strategic Environmental Assessment Regulations of 2010<sup>1</sup>. Our comments on the SEA Scoping Report are provided below and we look forward to be consulted on the draft Plan/s and the SEA Environmental Report.
- 1.2 The Scoping Report states that the Transport Master Plan is still being formulated and therefore, details of its proposals are not available at this stage. It is also noted that the Master Plan will identify potential projects and actions for implementation until 2025, focusing on transport sectors such as land transport, public transport, ports, ferries and air transport and will include detailed sector action plans.

## 2. General comments

- 2.1 The Environmental Report is an important step in the SEA process to ensure that all possible significant environmental impacts are addressed at an early stage.

### *Plan-level Appropriate Assessment*

- 2.2 During the SEA Screening process, MEPA could not determine whether the National Transport Strategy and National Transport Master Plan require a plan-level Appropriate Assessment, mainly due to the lack of information available at the time. **The Appropriate Assessment screening process for the National Transport Strategy and National Transport Master Plan, which is a requirement under Regulation 19 of the Flora, Fauna and Natural Habitats Protection Regulations of 2006 (L.N. 311 of 2006) as amended, is still pending.**
- 2.3 MEPA notes that more detailed information, including potential projects related to transport, will be available as part of these Plans. In order to conclude its Appropriate Assessment screening process, and therefore determine whether a plan-level Appropriate Assessment is required, MEPA requires submission of further information as part of the SEA process. **The SEA process should provide suitable and sufficient information on the likely significant impacts of these Plans on Special Areas of Conservation and Special Protection Areas / Natura 2000 sites.**

### *Project-level Environmental Assessment*

- 2.4 Future proposals emerging from, or are connected to, the implementation of these Plans may also require separate project-level environmental assessment once more detailed information about the specific projects and alternatives are available. This

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<sup>1</sup> Legal Notice 497 of 2010

may include an Environmental Impact Assessment (EIA) and/or an Appropriate Assessment in line with the requirements of the EIA Regulations of 2007 and the Flora, Fauna and Natural Habitats Protection Regulations of 2006, as amended, respectively.

### 3. Detailed comments

- 3.1 In addition to the information provided in the SEA Scoping Report, MEPA considers that the Environmental Report should also address the following issues.

#### Chapter 4 – Baseline Data, Table 1 Environmental baseline

- 3.2 With respect to the section on **biodiversity / fauna and flora**, it is recommended that the Environmental Report should report on the current conservation status of the areas, protected species, etc. listed in Table 1. This is important since the strategic assessment needs to evaluate the likely significant impacts on the conservation status of these protected areas, species, etc. as highlighted in Table 2 of the Scoping Report.
- 3.3 With respect to the section on **soil**, it is recommended that the Environmental Report could also report on the current situation vis-à-vis: soil organic matter biomass; soil compaction; soil ecology/underground biodiversity; soil landsliding (mass displacement issues); and soil salinisation. It is suggested that the authorities responsible for agriculture are contacted to determine whether any useful information and data is available on such matters.

#### Chapter 7 – SEA Objectives, Table 2 Environmental objectives & indicators for assessing impacts

- 3.4 With respect to the section on **biodiversity / fauna and flora**, it is recommended that the assessment of impacts should also address, through the establishment of specific criteria and indicators:
- the need for Malta to achieve Good Ecological Status of coastal waters and Good Environmental Status of marine waters beyond protected areas, as per Water Framework Directive and Marine Strategy Framework Directive requirements respectively;
  - any possible changes to visitor travel patterns, including car trips, which could put more pressure on sensitive environmental areas; and
  - any possible effects on greenfield sites / undeveloped land.
- 3.5 Moreover, better linkages are required between the criterion on ecosystems services and the associated indicators. At present, most of the indicators focus on the conservation status of protected area, species, etc.
- 3.6 With respect to the section on **water**, it is acknowledged that the indicator 'quality of the marine environment' would cover all aspects covered by the WFD/MSFD. However, nutrient status seems to be singled out. It is recommended that reference should be made to 'quality of the marine environment in terms of biological and physico-chemical elements'.
- 3.7 With respect to **soil**, it is recommended that the number of soil permits issued by the Agriculture authorities could also be included as another SEA indicator. MSDEC-AGR is the data holder/provider.

- 3.8 With respect to the section on **landscape**, it is recommended that the assessment could also consider, from a strategic perspective, any possible significant impacts on landscape features.

*Appendix 1: Analysis of Related Plans, Programmes, and Legislation*

- 3.9 It is recommended that the Soil Thematic Strategy should be included in the list of relevant plans, programmes, etc and should be taken into consideration during the strategic assessment. This refers to the document Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions - Thematic Strategy for Soil Protection [SEC(2006)620] [SEC(2006)1165]: /\* COM/2006/0231 final \*/.

*Brief description of the Strategy:*

- 3.10 The Strategy explains why further action is required to ensure a high level of soil protection, sets the overall objective of the Strategy and explains what kind of measures must be taken. It is made up of a Communication from the Commission to the other EU Institutions, a proposal for a Directive of the European Parliament and of the Council (currently withdrawn although awaiting a forthcoming review) and an Impact Assessment.
- 3.11 The Strategy's objective is to define a common and comprehensive approach in a coherent way, focusing on the preservation of soil functions, based on the following principles:
- Preventing further soil degradation and preserving its functions;
  - By acting on soil use and management patterns, when soil is used and its functions are exploited;
  - By taking action at source, when soil acts as a sink/receptor of the effects of human activities or environmental phenomena; and
  - Restoring degraded soils to a level of functionality consistent at least with current and intended use, thus also considering the cost implications of the restoration of soil.
- 3.12 It creates a common legal framework to ensure that EU soils stay healthy for future generations and remain capable of supporting the ecosystems on which our economic activities and our well-being depend. STS is one of the seven thematic strategies which the Commission has proposed. They represent the next generation of environment policy, taking a global and medium-term perspective, setting clear environment objectives and seeking to identify the most appropriate instruments to achieve these objectives.

*Implications for Malta's Transport Strategy and Master Plan:*

- 3.13 The Transport Strategy and Master Plan and SEA needs to consider this (Soil Thematic) Strategy during their preparation.