

TO: Perit Vincent Cassar, Chairman

FROM: Christine Tanti, Unit Manager

THRU: Kevin Mercieca, CEO
Aimee Brincat, Director
Alexander Camilleri, Deputy Director

DATE: 6th March 2026

SUBJECT: PA05908/23 (EA/00007/18): Proposed conversion from a temporary to a permanent tuna farming area as established in PA 2175/18; to setup the North Aquaculture Zone (NAZ) intended exclusively for tuna farming.

LOCATION: Site off Sikka I-Bajda, Sikka I-Bajda, San Pawl il-Bahar

1. Introduction and Case Background

The proposal entails a change from a temporary tuna farming area as approved in PA02175/18 to a permanent one while retaining the approved total biomass, thus establishing the North Aquaculture Zone (NAZ), exclusively for tuna farming. PA02175/18 was an application for the consolidation of a temporary tuna farming area at sea located off the northeast coast of Malta approximately 5 km from the shore (in the area approved through development permits PA03072/17 and PA05858/17) with a total biomass of 3,300 tonnes of fish. The consolidation of the temporary tuna farming area (i.e. PA02175/18) had been subject to an Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) in 2018. ERA had communicated its latest position in December 2018 as per E-apps documents PA02175/18/302a-c.

ERA noted that the assessment of long-term impacts on the seabed that can potentially occur as a result of the proposed conversion of AJD Tuna Limited cages from a temporary to a permanent installation, should be based on updated studies and compared with the baseline studies that were undertaken for the EIA and AA for the temporary sites. To this effect, ERA requested the submission of an EIA Update in line with Regulation 24(3) of the EIA Regulations (S.L.549.46) and an update to the AA. Such submissions were submitted to the Authority as an Addendum to the previous EIA and AA Reports.

The Addendum was submitted to ERA on 12th March 2025 and uploaded on the ERA website (<https://era.org.mt/era-project/pa02175-18/>). The Report was subject to review, including a 30-day consultation with the public (covering the period 16th March 2025 – 16th April 2025). Following conclusion of the review, the final consolidated version of the Addendum (including feedback received during the consultation and the responses by the EIA Coordinator thereon) was submitted to ERA on 17th December 2025. A summary of the EIA process is being annexed to this document (Annex I).

2. Outcome of the EIA-related updates

Impacts in relation to marine benthos during the deployment of mooring blocks was confirmed by the EIA coordinator to be major significant in view of their placement on area with rhodolith habitats with >50% cover.

During operations, impacts related to uneaten feed and increase organic input (faeces and excreta) on seabed/habitat and water quality were confirmed to be of minor adverse to not significant, as long as good farm management practices are in place.

Impact related to changes in currents and sediment movement resulting from the presence of mooring blocks was confirmed to be not significant.

The presence of new structures and presence of food resulted in a minor beneficial impact, however at the same time attracted scavengers and detritivore community beneath the cages resulting in changes in ecological relationship. No evidence was recorded with regards to the introduction of alien species and disease-causing organisms.

The presence of anthropogenic litter on the seabed, mostly from the tuna penning activities, as recorded through the monitoring data was confirmed to be of concern. Monitoring revealed the litter seems to be on the increase from season to season. Greater effort needs to be made for this material to be collected and disposed of ashore.

With regards to water quality, the release of fish oils and mucus from baitfish, and blood and offal released during culling, harvesting and processing were confirmed to be of minor adverse to not significant. This is as long as feed management is strictly enforced, and any tuna carcasses or excessive uneaten feed fish are collected immediately so as not to overload the scavenger system on the seabed. Pollution impacts from operation vessels, such as release of petroleum hydrocarbons, sewage, bilge water and oil spills were confirmed as not significant.

With regards to avifauna, impacts associated with oiling, predatory effect from gulls and ingestion of marine debris as a result of this specific farm remain uncertain, in view that these have not been monitored. Further studying in this regard is being proposed in the updated EIA Report. In view of the relatively low light intensity during operations, such impact is considered as minor adverse.

Secondary impacts such as archaeology were also considered in the Addendum. No effects have been reported during operations and the likelihood of buried items being disturbed is low.

With regards to human populations, issues revolve in relation to the discharge of fish oils and slime impacting recreational activities, navigational safety and location of the farm within the Armed Forces of Malta (AFM) Pembroke High firing arc.

3. Outcome of the AA-related updates

With regards to the Special Area of Conservation *Żona fil-Baħar bejn Il-Ponta ta' San Dimitri (Għawdex) u Il-Qaliet*, it was concluded that the environmental monitoring data indicated that tuna penning activities

have not caused appreciable changes in overall water quality. It was noted that monitored parameters have remained within ranges typical of pristine offshore waters and no significant differences observed between up-current and down-current stations. Occasional foam or oil slicks were noted but did not result in lasting water quality impacts.

Assessment of impacts on the SAC focused on benthic species composition, as macroalgae condition was not relevant due to site depth. The seabed supports several protected habitats, including rhodolith-associated communities, with conservation objectives requiring stable species composition. Monitoring data (2019–2023) identified some small, localised, and reversible alterations to the seabed physical and biological characteristics, particularly near mooring blocks, but impacts from organic waste were considered insignificant, with no anoxic conditions detected.

Benthic monitoring showed increased scavenger and detritivore communities beneath cages, reflecting attraction to organic matter. However, an increase in anthropogenic litter on the seabed associated with tuna farming was identified, highlighting the need for improved operational practices, staff training, and active litter recovery measures.

Special Protection Area (SPA), *Żona fil-Baħar Madwar Għawdex* is directly relevant to the farming site and supports breeding populations of Scopoli's shearwater (*Calonectris diomedea*) and Yelkouan shearwater (*Puffinus yelkouan*). SPA, *Żona fil-Baħar fil-Grigal ta' Malta* is indirectly relevant due to its use by seabird species, including the European storm petrel and Yelkouan shearwater, for feeding and rafting.

The Conservation objectives for these SPAs aim to maintain current seabird population size, distribution, and breeding population, with operational objectives focused on improving knowledge of seabird ecology and interactions with human activities. The use of raw, unwashed fish food attracts sea birds to tuna farms, but the nature and significance of these interactions remain uncertain, highlighting the need for targeted research, as an extension to the Conservation objectives and measures for Malta's marine Natura 2000 sites specifically in line with Operational Objective for seabirds to include aquaculture activity (OO-SB-2).

Potential impacts from artificial lighting at the farm are considered insignificant. Reports of seabirds being oiled by fish slime indicate an interaction linked to tuna farming generally rather than the specific site. Overall, converting the farm from a temporary to a permanent installation is not expected to significantly change impacts on seabirds, which are likely to remain minimal and primarily related to operational interactions rather than farm location.

4. Directorate's assessment and recommended way-forward

The proposal was considered in the light of the already approved development, notably the development commitment established through PA02175/18. The most significant impacts related to this project had already been taken into consideration during ERA's assessment of the 2018 EIA/AA Reports, namely marine benthos, water and sediment quality and avifauna.

The operators of the farm did not relocate to the site assessed through PA02175/18, from an area with more than 50% rhodolith habitat cover to an area between 0 to 50% rhodolith habitat cover. The same farming operations have been ongoing since 2017 and through environmental monitoring data available since 2019, it was observed that the changes to the environment have been small, localised and reversible. In this regard, the Directorate has no objection from an environmental point of view for the farm to remain in its current location. Updating of the site plan on e-apps and relevant environmental permits are required, as necessary.

From the environmental monitoring data, it was evident that although good farm management practices are in place, these should be encouraged further, especially in terms of:

- Feeding regimens and management to minimise the presence of scavenger/detritivore community beneath the cages, with benthic and demersal megafaunal scavengers attracted to the area by the presence of organic matter; and
- Effort to minimise the offboarding of anthropogenic marine litter and collection and disposal of ashore.

Foam and oil slick were assessed in terms of both water quality and avifauna. With regards to water quality, monitoring has confirmed the farm has not resulted in appreciable alteration of the water quality. Seabirds oiled by fish slime have been reported in recent years, however while this impact is linked with tuna farming activities, it cannot be linked to a specific farming site. That being said, the Directorate notes the feed management being implemented by the operators, through the Environmental Permits to minimise and control the spills. The Directorate supports the consultants' recommendations for additional patrolling, oil collection measures and early warning systems. The Directorate also supports the possibility of changing the feed to the new artificial feed being developed specifically for tuna.

Artificial night-time lightings, specifically for navigation, is considered of relatively low intensity and insignificant when compared to the light pollution originating from nearby terrestrial sources.

The previous no-objection from an environmental point of view, as communicated for PA02175/18 in December 2018, was based on the fact that the development was unlikely to have a significant residual impact when considering the below:

- The temporary nature of the farm until the North Aquaculture Zone is set up;
- The temporary and seasonal nature of the operational activities, hence giving the surrounding environment time to regenerate;
- That most of the identified impacts are of a reversible nature; and
- The fact that the operations are restricted to small portion of the total area of the SAC and SPA.

Noting the environmental monitoring data and the assessment carried out by the EIA and AA coordinator, the Directorate has concluded that the change from a temporary tuna farming area to a permanent one, while retaining the approved total biomass thus, establishing the North Aquaculture Zone (NAZ) exclusively for tuna farming, will unlikely to have a significant residual impact on the environment and that the conclusions remain valid vis-à-vis the current application, subject to the conditions listed in Section 5 below.

5. Recommended conditions

1. All operations within the zone are to be managed by the applicant (i.e. the Department of Fisheries and Aquaculture).
2. The applicant must ensure that each operator, operating within the zone has all the necessary valid permits required by the ERA.
3. Each operator operating within the zone must adhere to the requirements, monitoring and conditions set in the Environmental Permit issued by the ERA.
4. Monitoring shall be carried out throughout the year. The applicant is responsible to ensure that such monitoring is carried out.
5. A method statement for the deployment, management and eventual decommissioning of mooring blocks is to be submitted and approved by the ERA prior to the commencement of works, and thereafter the relative works shall adhere to such plan.
6. Following harvesting, any structures (including collar pens and nets) shall be dismantled and removed from the site.
7. The permitted development shall not be a source of light and noise pollution. To this effect, the following specifications shall be adhered to:
 - Lighting shall be strictly limited to the site, and its height and orientation shall be designed in a manner that does not cause excessive illumination beyond the site; and
 - Permanent lighting to be used on site is for navigational purpose only.