

Comments on the Environmental Impact Assessment Report

PA/05665/18

To extend hard stone quarry G12 for the extraction of rock to a depth of 5m above M.S.L.

Quarry G12, Ta' Klement, Qala, Gozo

Consultees' Comments on the EIA Report (8 March 2026 – 7 April 2026):

No.:	From	Comments
1	Planning Authority Dated: 10/03/2026	<p>The development, as proposed, raises the following issues from a planning perspective:</p> <ol style="list-style-type: none">1. The proposed site falls outside the Quarry area indicated on Map 14.8-E of the Gozo and Comino Local Plan and would also run counter to the objective of policy GZ-Qala-1 of the Local Plan which stipulates that there will be strong presumption against lateral surface mining.2. The proposed extension will be extended on a site that lies within a proposed Area of High Landscape Value from Rdum tal-Marin to Ras il-Qala and Iz-Zewwieqa; Area of Ecological Importance Level 3, which acts as a buffer zone to protect the integrity of the coastal area and karstic landscape; and an Area of Ecological Importance Level 2 Coastal area and contiguous karstic landscape extending further inland up to Ta' Berqa and Tax-Xulliel.3. The site is subject to Enforcement notice ECF 00244/02 (Construction of franca boundary wall and formation of passage without permit). The proposal cannot be considered further unless the illegal development is first completely sanctioned or removed considering that the illegal situation on site does not satisfy all criteria in terms of regulation 17(5) of S.L.552.13.4. The proposed extension of the quarry would result in further encroachment of quarry activities in the area designated as Geological Park. Thus, proposal runs counter to the objectives of Policy GZ-Qala-2 of the local plan which aims to safeguard the area for geological and industrial heritage park and prohibits further extension of the existing active quarries within this area.5. Site falls within a Class E Archaeological constraint in view of a Phoenician Rock-Cut tomb.
2	Environmental Health Directorate Dated: 01/04/2026	<p>Following the review of the Environmental Impact Assessment (EIA) dated March 2026 concerning the above-mentioned project, the Environmental Health Directorate (EHD) is submitting the following comments and recommendations for consideration by the Competent Authority.</p> <p><u>Air Quality, Dust, and Emissions</u></p>

No.:	From	Comments
		<p>The applicant is to implement all proposed mitigation measures to minimise nuisance and reduce adverse impacts arising from air pollution, including dust dispersal and emissions from vehicles and machinery. Continuous monitoring is strongly recommended to ensure proper implementation of the required measures and adherence to best working practices throughout the duration of the project.</p> <p>All necessary dust-control and air-quality mitigation measures are to be applied consistently. Water used for dust suppression, wheel washing, and general cleaning must be properly managed to prevent run-off. If water spraying is utilised, it must be treated with biocide to minimise the risk of Legionnaires' disease. Uncontrolled or excessive water use may result in slurry run-off accumulating in low-lying areas and potentially reaching coastal waters. Additional mitigation measures or alternative de-dusting systems should be implemented where necessary. Mist-cannon systems recommended to operate using first-class water, adequately chlorinated.</p> <p>It is of utmost importance that all air-quality mitigation measures are rigorously implemented to avoid deterioration in air quality and the associated negative impact on public health.</p> <p><u>Noise and Vibration</u></p> <p>The Environmental Health Directorate notes that the EIA states that six on-site machines operating together would produce a combined noise level of 462 dB. This value exceeds the levels generally associated with industrial activity as outlined in WHO guidance, which recommends significantly lower noise levels to protect public health. The applicant is therefore requested to provide a corrected and clearer indication of the expected noise levels, including those likely to be experienced at the nearest residences and other sensitive receptors.</p> <p>Mitigation measures to reduce noise and vibration impacts must be fully implemented throughout the duration of the project.</p> <p><u>Surface Water, Seawater Protection, and Handling of Liquids</u></p> <p>All machinery and vehicles must be maintained in good working order to prevent spills or leaks of oil, fuels, lubricants, or chemicals. All hazardous materials must be stored in sealed, leak-proof containers. Proper handling of raw materials must be ensured to prevent contamination of surface water or seawater.</p> <p>An appropriate system must be in place for the collection and safe disposal of wastewater arising from activities on site.</p> <p><u>Sanitary Facilities</u></p> <p>Any mobile toilets placed on site must be equipped with a wash-hand basin supplied with potable water and must be adequately ventilated and illuminated. Wastewater tanks must be regularly emptied by a licensed operator to avoid leakages and contamination of the surrounding area.</p> <p><u>Waste Management</u></p>

No.:	From	Comments
		<p>All waste generated during the project shall be managed in accordance with the approved waste management plan and the Waste Management Policy. No waste or loose material is to be allowed to exit the site in an uncontrolled manner. Adherence to established waste-handling procedures is mandatory.</p> <p><u>Transport, Traffic, and Dust Control During Material Movement</u></p> <p>Construction-related traffic should follow designated routes. All materials transported to or from the site must be carried in adequately covered vehicles to prevent dust dispersal. Wheels of vehicles must be washed prior to exiting the site. Additional measures must be implemented to prevent dust, materials, liquids, or debris from being released during transportation. All traffic-related mitigation measures must remain in place throughout the project.</p> <p><u>Pollution Events and Incident Response</u></p> <p>In the event of pollution of seam ater or the surrounding environment arising mom project activities—particularly w here such pollution may impact public health—the Superintendent of Public Health must be notified and engaged in the necessary response actions.</p> <p>An Incident Pollution Control Plan must be established. All pollution incidents. including potential contamination events. must be recorded and reported to the relev ant authorities. Operators must take responsibility for the prompt cleaning or any contaminants lead ing the site.</p> <p><u>Conclusion</u></p> <p>All applicable Building and Sanitary’ Laws and Regulations must be strictly adhered to.</p> <p>Any complaints lodged by the public are to be investigated without delay. Records of all complaints received, and actions taken must be kept and made readily available to the Competent Authorities upon request.</p>
3	Occupational Health & Safety Authority Dated: 07/04/2026	<p>The employer at this site shall ensure that:</p> <ol style="list-style-type: none"> 1. All work activities at this place of work comply with the requirements of Act XXXIII of 2024 and all relevant OHS regulations. 2. One or more persons having the necessary aptitude, capabilities, competence and training shall be designated to assist the employer in undertaking the measures which are required to be taken in relation to the protection of occupational health and safety and the prevention and control of occupational risks, as per LN 36 / 2003. 3. ALL work activities falling under one’s responsibilities are covered by a suitable, sufficient and systematic risk assessment carried out as per LN 36 / 2003 and other relevant OHS regulations. Without prejudice to the legal obligations of an employer, this risk assessment shall, inter alia, refer to: <ol style="list-style-type: none"> (a) The measures to be taken against risks from manual handling of loads as per LN 35/2003. (b) Protection against exposure to chemical agents including carcinogens at work as per LN 227/2003 and LN 122/2003 including but not limited to measures against inhalable dusts and metals. (c) The measures to protect workers from risks from exposure to the sun. (d) The required emergency prevention, preparedness and response arrangements including first aid and firefighting measures. (e) Protection against physical agents at work including but not limited to risks from noise and vibration.

No.:	From	Comments
		<p>(f) Traffic management.</p> <p>(g) Protection of workers from risks of electrocution as required by LN 44/2002.</p> <p>(h) Personal protective clothing / equipment to be used by workers.</p> <p>(i) Suitable welfare facilities to be made available for staff.</p> <p>(j) The required health and, or safety signs and.</p> <p>(k) Training and competence of workers to perform the assigned tasks.</p> <p>This risk assessment shall also make reference to the necessary health surveillance that is required wherever there is revealed an identifiable occupational disease or adverse health condition related to the work involved OR the likelihood that a disease or condition may occur under the particular conditions of work, as per LN 36 / 2003 and other applicable OHS regulations.</p> <p>4. All work equipment complies with the relevant provisions of LN 293 / 2016, including where applicable, by ensuring that work equipment is duly examined by a competent person and a report of such examination is kept by the employer and (where applicable) also sent to OHSA and.</p> <p>5. Any intended construction related works comply with the relevant provisions of LN 52/2025 in particular:</p> <ul style="list-style-type: none"> • Ensuring that a competent project supervisor is appointed for both the design and execution stages. • The preparation and implementation of a Construction Phase Health and Safety Plan prior to commencement of works. • The coordination of health and safety measures among all contractors and workers on site. • The provision of adequate welfare facilities, safe access and egress, and protection against falls and other site hazards. • • The notification of the construction project to the OHSA as required by the regulations.
4	<p>The Energy and Water Agency</p> <p>Dated: 07/04/2026</p>	<p>The following are comments for The Energy and Water Agency divided by considerations which relate to specifically and solely to energy and water management.</p> <p>Energy:</p> <ul style="list-style-type: none"> • No Comments <p>Water:</p> <ul style="list-style-type: none"> • We recommend that at least a buffer zone of 15m is left between the maximum depth of the quarry and the mean sea level to ensure sufficient protection to the groundwater body present in the area.
5	<p>The Superintendence of Cultural Heritage</p> <p>Dated: 07/04/2026</p>	<p>The Superintendence has assessed the data gathered and compiled in the reports entitled EIA Coordinator Report, EIA Non-Technical Summary, and Appendixes 1-9.</p> <p>Proposal</p>

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		<p>Planning Application PA 5665/18 is for an extension to hardstone quarry HG 12 at Ta' Klement, Qala, Gozo, which quarry is covered by a valid planning consent. The site covers an area of approximately 20,700m². The location of the quarry is on the eastern littoral of Gozo. The landform consists of terraced slopes, rubble walls, exposed rock, arable land and mineral extraction.</p> <p>Policy context</p> <p>The Superintendence notes Policy GZ-Qala-2, which recognises that the stretch of coastal area between Dahlet Qorrot and the hardstone quarrying complex at Għar id-Dar/Ta' Klement is of considerable ecological and geological importance. It also contains traces of quarrying activity spanning a long period of time. This area therefore merits protection. While the policy states that the area of land shown on MAP 14.8-E shall be safeguarded as a geological and industrial heritage park, it also recognises that the exact boundaries of the park are to be established following a more detailed study of the area. Nevertheless, Policy GZ-Qala-4 recognises that the exploitation of mineral reserves may be considered, while linking such exploitation to a specific development project. This commitment to the extension of quarries is also indicated in MAP 14.8-E, which clearly highlights an area committed to quarrying. However, the study does not include an overlay of the existing and proposed quarry in relation to the area committed for quarrying as indicated in the local plan.</p> <p>The Superintendence strongly recommends that the study include an overlay of the proposal with MAP 14.8-E. This would permit an assessment of the proposal's compliance with the intent of the local plan.</p> <p>Cultural Heritage context</p> <p>From a cultural heritage point of view, one may note the presence of terraced fields, which confirm unexceptional agricultural activity. There is also considerable evidence of historical quarrying within and immediately outside the site. In particular, the most significant quarrying activity appears to date from the late 19th and early 20th centuries and is associated with the construction of the Valletta breakwater. This turn-of-the-century activity is evidenced by quarrying remains, as well as slipways and mooring points related to the operation of the historical quarries.</p> <p>Report on Cultural Heritage</p> <p>The information has been gathered from studies related to earlier applications on this site, specifically PA 7412/97 and PA 6894/98, which included conditions to ensure the preservation of any structures that might survive in the immediate vicinity of the works. These structures include the girna as described in the currently submitted report.</p> <p>The Superintendence finds that significant cultural heritage features have been satisfactorily identified in the submitted report and are located almost entirely outside the proposed development area. The historical quarry marks within the footprint do not appear to be associated with the significant turn-of-the-century quarrying and are not of such value as to prejudice the legitimate development of the area.</p> <p>Report on Visual Impact</p> <p>The Superintendence expresses greater concern regarding the visual impact of the proposed development. While the area has long been associated with quarrying, historical quarrying was undertaken on a smaller scale and to a lesser depth, thereby permitting continued legibility</p>

No.:	From	Comments
		<p>of the natural landform and resulting in a comparatively lower impact on the landscape. By contrast, contemporary quarrying, carried out at greater depths and on a larger scale, is undeniably more visually intrusive.</p> <p>While the report contends that the existing quarry and the proposed extension do not have a significant impact on views from the landward side, the Superintendence notes the very high visibility of the quarry from the sea. This viewpoint assumes greater significance in light of the increase in maritime leisure activity. The Superintendence therefore notes with concern the very limited visual documentation of the site as seen from the sea, as well as the absence of photomontages or even wireframe overlays that would allow for an adequate assessment of visual impact.</p> <p>Mitigation measures</p> <p>Without prejudice to the concerns expressed above, this Office also notes the proposed mitigation measures, which are not objectionable in principle. In particular, the Superintendence would view favourably landform restoration and a return to agricultural use in the long term. Nevertheless, the Superintendence is constrained to note the lack of detail in the proposed mitigation measures, particularly given that landform restoration is not tied to any specific timeframe or binding obligation. Such measures would need to be secured through specific conditions attached to any permit and should be subject to clearly defined timeframes.</p> <p>Conclusion and Recommendations</p> <p>The Superintendence considers this to be a significant lacuna in the study and strongly urges the preparation of adequate photomontages, including wireframe overlays, from various viewpoints from the sea in order to enable a proper assessment of the visual impact.</p>

Public comments on the EIA Report (8 March 2026 – 7 April 2026):

No.:	From	Comments
1	A Member of the Public Dated: 29/03/2026	Jien favur dan il-permess, ghax jekk jinghata kif mitlub mil-applikant, jibqa jkun hawn l-ghazla u prezzijiet ikunu ragonevoli u il-kwalita tibqa tkun tajjba. Wkoll jigi iffrankat li dan il-materjal tant importanti ghal-Ghawdex jigi impurtat min-barra u b' hekk jigu iffrankati il-pollution inqas inkwinament u kongestjoni fil-Port ta' Mgarr. Huwa importanti hafna li jinghata dan il-permess minhabba l-aspett ta' tkabbir ekonomiku tal-gzira Ghawdxija. Minghajr il-materjal tal-qawwi maj jkunx jistghu issiru progetti ferm importanti kemm ghal-Ghawdex kif wkoll ghal-gvern tal-gurnata. Favur Favur ghal-dan il-permess li jigi approvat illum qabel ghada.
2	Malta Sociological Association Dated: 06/04/2026	<p>The Malta Sociological Association (MSA) welcomes the opportunity to provide feedback on the EIA Review for PA 05665/18.</p> <p>The MSA notes that social and human health considerations are included within the assessment, which is a positive and important component of the EIA process. At the same time, the Association would appreciate further clarification on how these social impacts were assessed. In particular, additional detail on the underlying methodology would be beneficial, including the research design, data collection methods (such as stakeholder or community engagement), and analytical frameworks applied.</p>

No.:	From	Comments
		<p data-bbox="501 142 2125 209">Such clarification would help strengthen transparency and provide greater confidence in the interpretation of potential cumulative, distributive, and longer-term social effects.</p> <p data-bbox="501 248 2125 347">The MSA therefore encourages the inclusion of further methodological detail, ideally with reference to established Social Impact Assessment (SIA) approaches, to support comprehensive and evidence-based decision-making. This would then enable the provision of substantive feedback on the social dimension of this application.</p>