

PA/00977/17: Comments received by ERA during the EIA Review (From 22nd March 2018 to 22nd April 2018)

A. Civil Protection Department (Email dated 22nd March 2018)

Comments

With reference to your request for CPD comments, it is highly recommended that Fire Hydrants are to be installed at strategic locations. Hydrants may be used in case of emergencies and when responding to national disasters as well as to natural, industrial and other emergencies that may occur. Note that same hydrants will not be used for the normal everyday firefighting appliances as this is done at the respective fire stations.

Kindly note that this is a life and property saving measure and shall be given its due attention.

B. Ministry for Environment, Sustainable Development and Climate Change – Agricultural Directorate (Email dated 28th March 2018)

Comments

The Agricultural Directorate is pointing out that for soil movement, it is very important that the necessary permits are in place as per Chapter 236 of the Laws of Malta.

C. Malta Resources Authority (Email dated 02nd April 2018)

Comments

The MRA has no comment on the proposed tunnels per se in so far as the functions under its immediate remit.

The WSC need to consider if the tunnels intersect with existing privately-owned registered or notified groundwater sources and what they will be doing to remediate any possible impact on such sources, in particular since the risk is recognised but not addressed in detail.

This assessment is based primarily on the documentation that was published on the weblink provided as on the date of the assessment. The Authority made its assessment on a good faith basis and reserves the right to review its position and, or to take action against the authors of the documentation and, or the applicant if information relevant to its assessment (particularly the prior use of the site where the development is proposed) is 'buried' or concealed (including through the submission of documentation that is not text searchable).

This, and any other response in writing by the MRA to the application submitted for consultation or to any other documentation, should not in any way be deemed as approving or endorsing the application in any form or of condoning any matter that falls beyond the MRA's immediate remit as established under the Malta Resources Authority Act and as in force on the date of the relevant response. In particular, you are reminded that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations have been excluded from the remit of Malta Resources Authority and as such the MRA has no authority to take

a position on matters regulated by these regulations or indeed any other matter that does not fall within its remit. While this response may be published, any response by the MRA may not be publicly used or mentioned as a general or partial approval by the MRA of the matter referred to for consultation.

D. Pembroke Local Council (Email dated 03rd April 2018)

Comments

On behalf of my client, Pembroke Local Council (address: Triq Alamein, Pembroke, PBK1776), I am hereby submitting the following comments regarding AIS Environment Impact Statement – Sunt mhux tekniku:

Immaniggar ta' Skart:

Il-Kunsill ma jaqbilx li tali materjal għandu jinżamm fuq il-post iżda għandu, ladarba jiġi skavat, jitgħabba u jitneħħa mill-lokal immedjatament. Dan minhabba li tali matejal jaf ikun ta' ħsara għall-bio diversita' tan-Natura2000 u inkonvenjent għar-residneti talmadwar.

Ġeoloġija, ġeomorfoġija, idroġeoloġija u ħamrija:

Dan l-ilma li jaf ikun ikkontaminat, fejn ser imur, fil-baħar? Il-Kunsill jitlob li dan jinġabar u jitnaddaf qabel jiġi dispers.

Wirt kulturali, storiku, arkeoloġiku u arkitettoniku:

Il-Kunsill qed jesigi li Node 9 għandha issir fiż-żona tal-ħamrija li hemm bejn il-Pembroke Park & Ride u Triq Sant Andrija. Rigward Node 12, ta min jinkludi magħha ukoll Node 11 u 10, li kollha jinsabu f'Żona Natura2000. Dan iwassal biex kemm jista' jkun l-ammont ta' Nodes għandu jitnaqqas biex l-impatt ikun minimu kemm jista' ikun, eżempju jinżamm biss Node 12 u jitneħħew Nodes 11 u 10.

In addition I am hereby submitting the following comments regarding AIS coordinated Assessment for the EIA:

Scheme site and immediate surroundings:

Il-Kunsill Lokali Pembroke qed joġġezzjona bil-qawwa kollha li jkun hemm equipment/strutturi fiż-żona Natura2000 speċifikament Nodes 10 u 11. Dak ta' Node 12 faċilment jista' isir fis-sit tal-impjant tal-RO f'Pembroke.

Physical Characteristics and the Land Use Requirements during the Construction, Operational and Decommissioning Phase:

L-istorbju mistenni minn Shaft 9 u Shaft 10 ha jkun ta inkonvenjent għar- resident filwaqt li il- 'partial barrier' mhuhix adekwat. Dan huwa inaċċettabli u għalhekk il-Kunsill qed jinsisti li dan ix-xaft m'għandux isir daqstant qrib ir-residenti, anzi fl-opinjoni tal-Kunsill dan m'għandux isir.

E. Environmental Health Directorate (Email dated 05th April 2018)

Comments

With reference to Environmental Impact Assessment dated March 2018 regarding subject indicated in caption, kindly be informed that this Directorate would like to submit the following comments/recommendations regarding this proposal.

The justification proposed for this development is to upgrade the primary water network to reduce frictional losses and water leakages, at the same time improving the water quality in the Maltese Island. This will be done by constructing a 9km underground tunnel that connects the Pembroke

Reverse Osmosis Plant, the Ta' Qali group of reservoirs and the San Ġwann Misraħ Lewża reservoir. The Directorate has no objection with this regard, since this will aid to upgrade the primary water network of the Maltese Islands and hence be in line with the standards set by the DRINKING WATER DIRECTIVE (COUNCIL DIRECTIVE 98/83/EC). Therefore the Zero option (do-nothing-Scenario) should not be considered, due the fact that water properties will remain of a low quality. Should this proposal be accepted, the applicant is to adopt best practice methods together with good site practices and ensure compliance with Environmental Management Construction Site Regulations during the construction phase. Moreover, applicant is to implement all proposed mitigation measures so as to cause least nuisance and mitigate adverse air pollution (from dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors in the Area of Influence, (especially residential areas, schools and retirement homes) and on the general public. Hence the importance of drawing up and implementation of a Construction Management Plan to ensure adherence to proper site management practices so as to address groundwater and surface water pollution, to mitigate other adverse construction impacts, including construction traffic impacts and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.

Safe and proper handling of raw materials on site should also be ensured. Chemicals, oils and lubricants are to be placed in enclosed containers to prevent any leakage on ground. Adequate preventive measures are to be taken regarding the potential oil spill from machinery used during construction to prevent the contamination of ground water, water catchment areas and aquifer.

Noise will be generated from the surface excavation of the tunnels, shafts and the transportation of excavated material and concrete by heavy vehicles. During the construction phase noise pollution will have an adverse impact on nearby residential areas and hence the importance of the developer implementing reasonable and feasible noise monitoring and control measures so that most construction noise objectives can be complied with. However the assessment carried out indicates that during drilling of the shafts a partial barrier which is 3m in height and is located within the 2m of excavation point will aid to reduce noise pollution. Despite this, noise pollution can still be an issue in the case of the residential and settlement area for nodes 1B, 4, 5, 6,6A, 6B, 8 10 and entry 1. Moreover appropriate noise control measures must also be taken by developer so as to sufficiently mitigate noise from equipment used underground.

Although no information is available at present time of how the area of influence will be affected by vibration during excavation of tunnel, it is recommended that any possible mitigation measure to control its effect should be available prior commencing of work. Monitoring the level of vibration especially near residential area and settlement area should be carried out. An action plan has to be adopted in the case that the level of vibration exceeds the $10\text{mm}\cdot\text{s}^{-1}$, "*Vibration is likely to be intolerable for any more than a brief exposure to this level*", as indicated in table 17, pg 35 of the technical report.

During the operational phase no noise and vibration pollution should affect the areas of influences. Measures mentioned to ensure that surface run-off, water used for dust control, wheel washing and general cleaning are to be adopted and maintained during construction. Furthermore, the water used for spraying to limit dust emissions should be treated with chlorine to prevent risk from Legionaries disease. It is to be noted that uncontrolled periodic spraying of excavated material with water to mitigate dust emissions may result in the production of run-off slurry that would flow down slope and pool in low-lying areas. Similar effect may result from washing vehicle wheels with sprinklers and hence further mitigation measures or else other de-dusting systems are to be considered. Even though these actions are deemed to be necessary to control dust emissions it is important to prevent possible impacts and nuisances from runoff. is of utmost importance that mitigation measures with respect to air quality are implemented so as to significantly reduce the impacts on public health resulting from the deterioration of air quality.

With regards to waste generated during the construction works the developer is to abide to the proposed waste management plan and waste handling procedures as per the current Waste Management Policy. It is recommended that all proposed mitigation measures, including those proposed for the operation and maintenance phase, are to be strictly implemented by the applicant so as to mitigate to the maximum any possible adverse impacts on public health especially with regards to any negative impacts on the Area of Influence. Any other unpredicted impacts and nuisances which may arise and that may have a significant adverse effect on public health should be immediately addressed by the developer and the necessary mitigation measures taken. All relevant complaints lodged should be investigated and remedial action taken immediately. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.

A pollution incident control plan should also be in place. Records of all pollution incidents, especially regarding potential pollution of the surrounding environment, are also to be kept and reported to the respective authorities accordingly.

There will be no light pollution effects during construction and operational phase.

It is recommended that construction traffic follows established specific routes and adequate site management together with other measures such as storing or transporting constructional waste properly covered to prevent dispersal of dusts, washing of wheels and other dust control measures are taken to mitigate adverse dust impacts and nuisances from heavy vehicles during transportation. All other mitigation measures which may be necessary to minimise nuisances and adverse health impacts from construction traffic are to be implemented.

Regarding any future plans for Scheme decommissioning, a full decommissioning plan should be prepared for approval by the relevant competent authorities.

Due to the nature of the project, that is constructing a 9km underground tunnel, could pose an environmental risk such as collapsing parts of tunnel during construction, flooding and others that might endanger employees life. For this reason the OHSA should be consulted.

F. Members of the public (Emails dated 22nd to 26th March 2018)

Date	Comments
22 March 2018	sar EIA u din procedura?
26 March 2018	As long as ownership rights of effected land owners are respected I can only but applaud such a project. However, as there will inevitably be a lot of waste generated I suggest that it is used for land reclamation. The debris will be clean, fresh and unpolluted rock that would be ideal for land reclamation as it would not have any pollutants.