

Our Ref.: DFA009/AJDfarm/AA Statement

Your Ref.: EA/00007/18

29 January 2024

Environment & Resources Authority

Attention: AA Team

Subject: EA/00007/18 – Proposed conversion from a temporary to a permanent tuna farming area as established in PA/02175/18; retaining the approved total biomass of fish and all relative conditions (PA/05908/23)

Introduction

1. On request by the Environment & Resources Authority (ERA) in a letter dated 6 November 2023, this statement is being prepared by the Coordinator who carried out the AA for the original proposal to *consolidate temporary tuna farming area at a parcel of sea approximately 5 kilometers from the shore (in general area approved for PA/03072/17 and PA/05858/17) for a total biomass of 3,300 tonnes of fish (PA/02175/18)*, in order to assess whether the proposed conversion of the tuna farming facility from a temporary one to a permanent one, as submitted to the Planning Authority and subject of development permit application PA/05908/23 would affect the conclusions of the Appropriate Assessment Report.
2. Specifically, the ERA requested:

ERA notes that the above-mentioned project proposes a change of use of the site from temporary as per in PA/02175/18 to a permanent one. In this regard, ERA requires a Statement from the EIA Coordinator outlining whether the said change will affect the conclusions of the EIA and AA Reports undertaken for PA/02175/18.
3. In order to assess the proposed changes, the EIA Coordinator requested the plans and a note on any changes being proposed from the project architect as no information was available on the Planning Authority's e-apps portal since the application is not yet fully submitted. A full set of the plans made available by the project architect are included in **Appendix I**. We are informed that no changes are being proposed from the project currently operated by AJD Tuna Limited at the Scheme site.

4. The plans provided were reviewed by the coordinator and we could confirm that the coordinates of the aquaculture zone are identical to those considered in the original AA for application PA/02175/18.

Proposed changes to the Scheme

5. As explained by the project architect, the Scheme as proposed in development permit application PA/05908/23 is identical to that approved in PA/02175/18 in terms of the location of the Scheme, the number of cages / amount of biomass to be reared, and the number, type, and area of moorings for the cages deployed. The only difference is that instead of a temporary facility that would move to a further offshore location once the NAZ is established, it will become a permanent one at this same location such that the impacts assessed as “short-term and/or temporary (for as long as the fish farm is in operation)”, will now become permanent and long-term.
6. As stated, the full set of plans for the Scheme as proposed are included in **Appendix I**.

APPROPRIATE ASSESSMENT OBJECTIVES

7. The aim of the Appropriate Assessment is to determine whether the Scheme will result in likely significant effects to the habitats and species for which the Natura 2000 site was protected. This is determined on the basis of identifying reasonable links between the Scheme’s effects and the qualifying interests of the Specially Protected Area (SPA) Il-Baħar ta’ Madwar Għawdex as well as on the Northeast of Malta marine Special Area of Conservation (SAC).
8. The ecology of breeding seabirds includes a reliance on the sea cliffs and therefore when considering potential impacts on avifauna, the context of the terrestrial SPAs upon which the breeding seabirds are also dependant should also be considered insofar as it is within the scope of the impact assessment. Of note in the context of the Scheme and the marine conservation area within which it is located, is the SPA Ramla tat-Torri / Rdum tal-Madonna, located along the northeast coast of Malta, on the L-Aħrax tal-Mellieha promontory, Kemmuna, Kemmunett, il- Ħaġriet ta’ bejn il-Kmiemen u l-Iskoll ta’ Taħt il-Mazz, and Selmunett.

IMPACT ASSESSMENT

9. The Appropriate Assessment considered effects on both the seabed and the general marine environment within the SAC, and effects on the seabirds that make use of the SPA. Most of the impacts were similar to those described in the EIA.
10. The conclusions of the AA are reproduced hereunder, together with a comment on whether the Scheme affects the conclusions.

As assessed in the AA for PA/02175/18	Potential Changes as a result of PA/05908/23
The AA identifies potential significant negative impacts in particular on the rhodolith beds. Even after mitigation, it is considered likely that direct physical impact from the moorings, deposition of organic matter onto this habitat and a	No difference from deployment of moorings since cages and moorings already deployed - no changes by converting to a permanent facility. Impacts from uneaten feed will remain

As assessed in the AA for PA/02175/18	Potential Changes as a result of PA/05908/23
<p>reduction in light reaching the rhodoliths will all contribute to a reduction in area and structure and function of this habitat in the direct vicinity of the Scheme. In order to fully understand whether the extent of the impact would compromise the integrity of the SAC overall, the extent of the presence of this habitat within the SAC and its conservation status would be needed. The location of the tuna cages over the area of seabed with the sparsest rhodolith associations (some areas support only bare sand), helps to reduce this impact, but it is not eliminated.</p>	<p>significant and with a permanent facility may lead to increased cumulation from season to season.</p> <p>The impact from shading would not be different on a yearly basis although the facility would change from temporary to permanent since the yearly use of the site would not change; however, since the site will continue to be used, the long-term effect of year-in-year-out shading could lead to long term effects on this habitat.</p> <p>Overall, the original AA had considered effects on the rhodolith habitat that were of a temporary nature (until such time that the farm would be relocated to the new NAZ), which was eventually identified as a location away from the rhodolith / maerl beds. Hence, the proposed continued use of the site for tuna farming is a changed scenario and is expected to have long term impacts on this habitat, which could be significant enough as to affect the integrity of this important habitat in the SAC.</p>
<p>With regards to the impact on bird species and the SPA, there is a degree of uncertainty from certain impacts including light pollution and increased litter. There is also uncertainty with regards to the potential increase in Yellow-Legged Gulls that may secondarily pose a threat to smaller seabirds of conservation interest, in particular, the Storm Petrel. Thus, at this stage, significant negative impacts on the Annex I seabirds and the SPA have not been identified; however, monitoring would be required to ensure that significant negative impacts are not incurred during Scheme operation.</p>	<p>The proposed change from a temporary to a permanent facility is not expected to result in a change in the conclusions of the assessment with regards to the avifauna and the SPA. The uncertainties identified remain.</p> <p>However, consideration should be also given in the AA to potential cumulation of impacts with those from other sources, including the adjacent bunkering zone and the potential scenario whereby the Scheme site would host a permanent tuna farm facility and the application for the NAZ further to the north is pursued and a second aquaculture zone set up.</p>

CONCLUSIONS

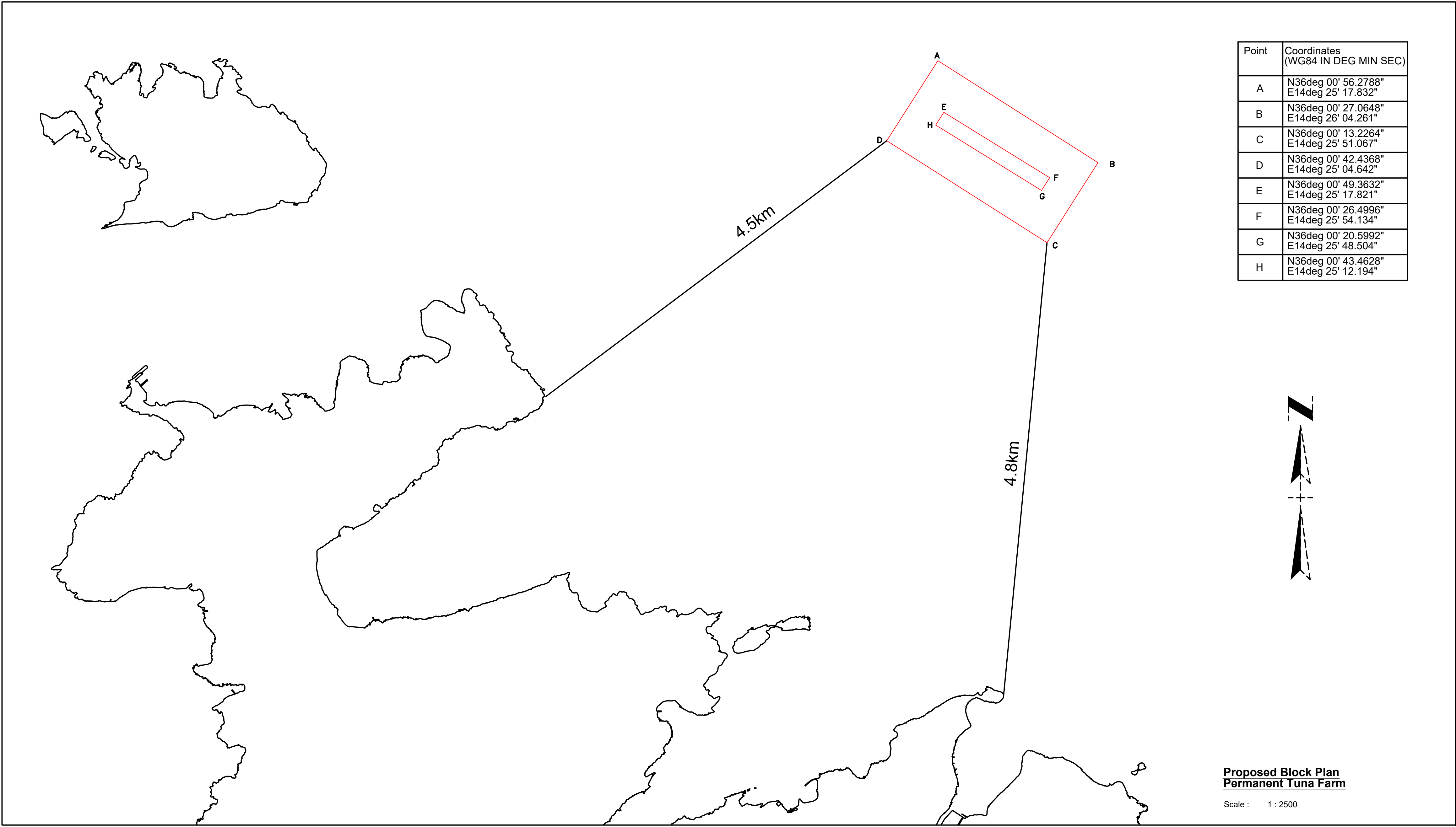
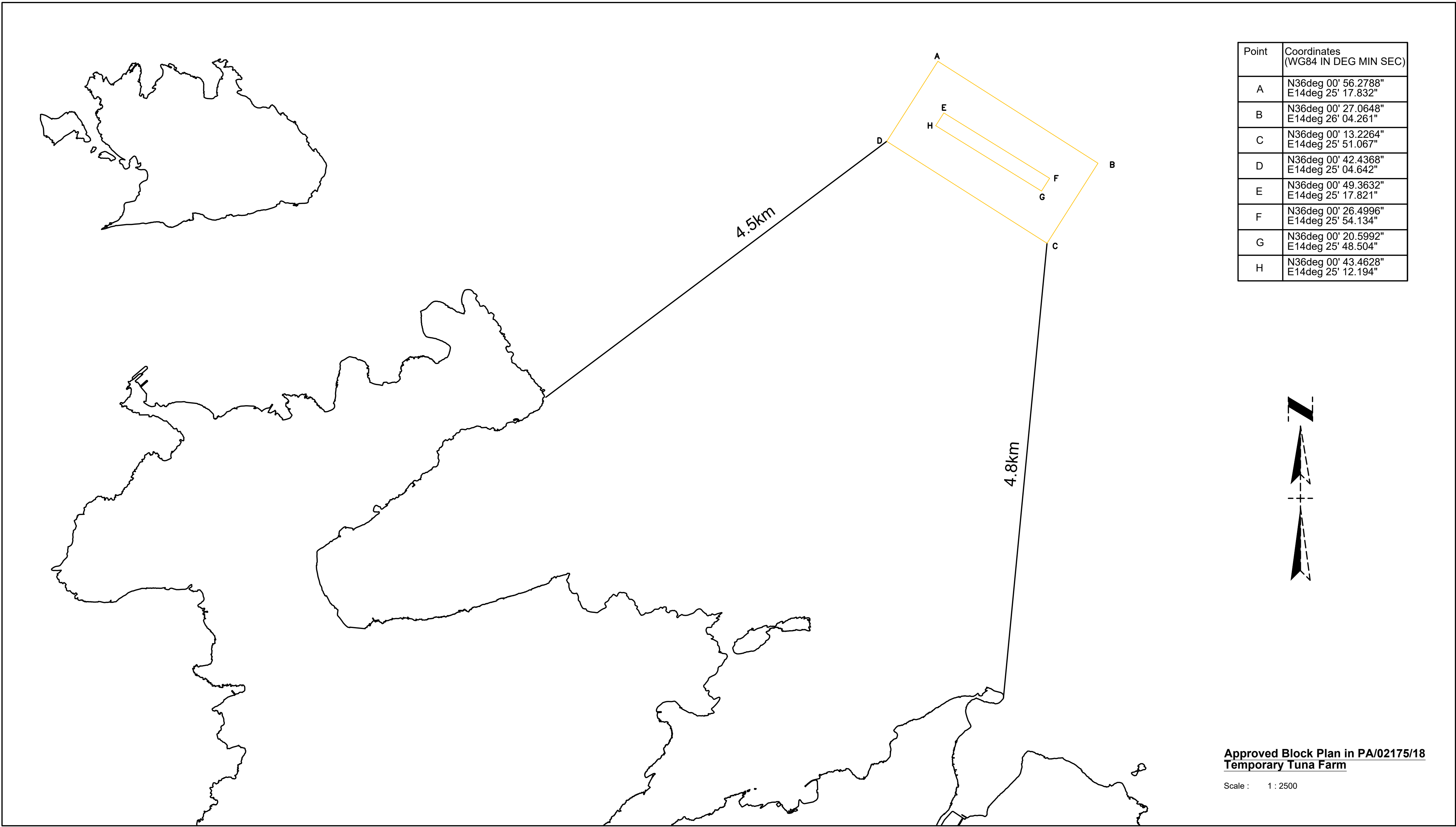
11. The proposal to convert the tuna farming activity at the Scheme site from a temporary to a permanent one is considered to change the situation such that the impacts on the rhodolith / maerl habitat would be significant and long term compared to the original conclusions of the AA.
12. Furthermore, the original Scheme was always considered temporary and had to be eventually relocated to a new North Aquaculture Zone (NAZ), subject of application PA/04811/19. With the current proposal to convert the Scheme to a permanent one and the proposal for the establishment of a NAZ still on the cards, the potential for cumulative effects from the two aquaculture zones would need to be properly assessed.
13. Impacts on avifauna and the integrity of the SPA are not deemed to change except if the change in the use of the Scheme site (from temporary to permanent) is coupled with the establishment of the NAZ (subject of PA/04811/19) further north. In this case, cumulative impacts would be expected to impact the bird populations through increased light pollution, noise, greater take up of sea surface used for rafting, and potential impacts on the gull populations that could lead to increased predation on the smaller seabirds.
14. We trust that the above meets ERA requirements for application PA/05908/23.

Yours sincerely,



Adrian Mallia
Managing Director
Adi Associates Environmental Consultants Ltd

Appendix I: Plans for PA/05908/23



METRES 0 500 1000 2000 5000
SCALE 1:25,000

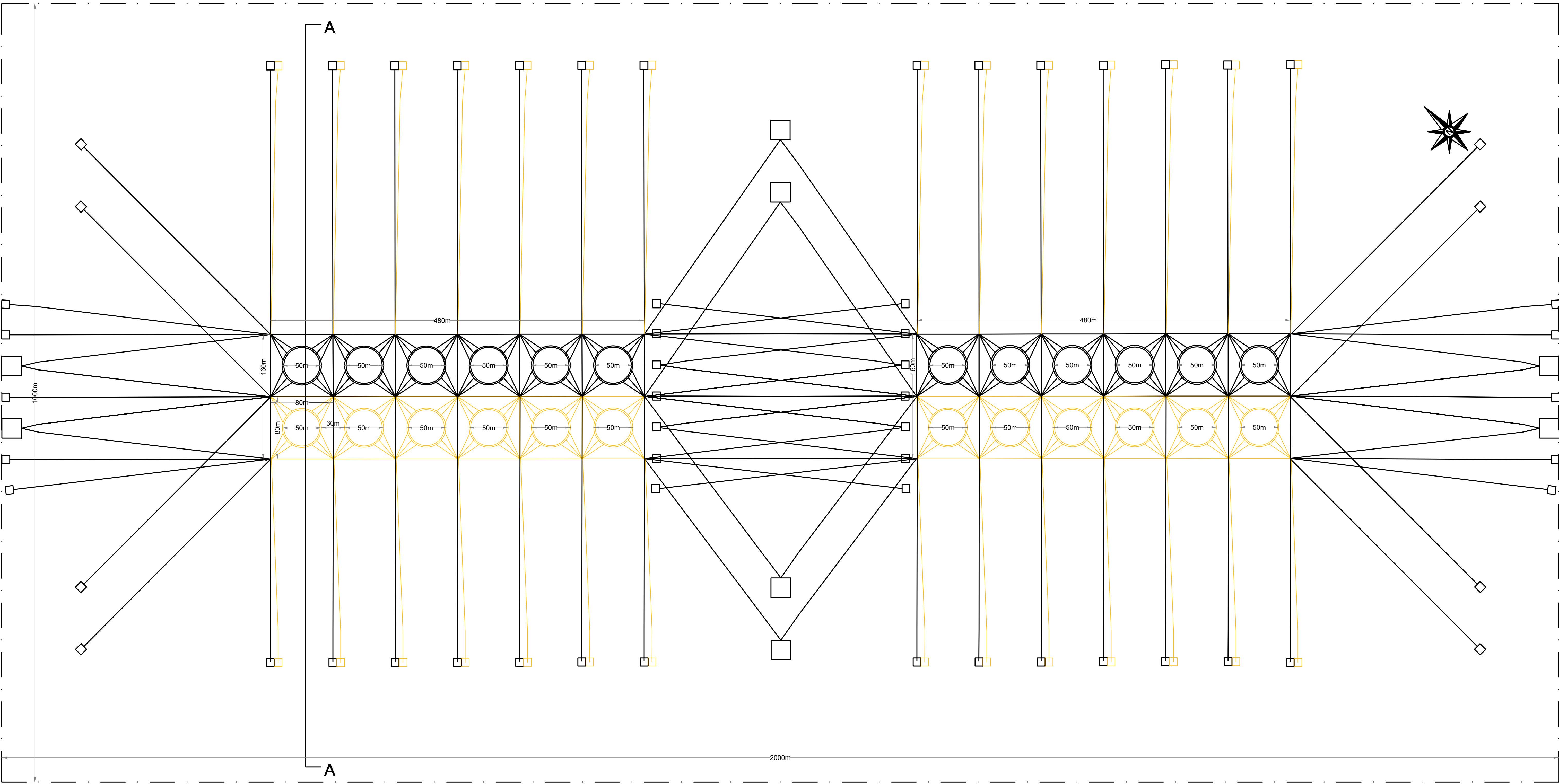
Legend	Notes
<div>Construction Proposed</div>	-Do not scale from this drawing.
<div>Demolition Proposed</div>	-This drawing is to be read in conjunction with other architectural, structural and services drawings or other consultant's documentation, permit conditions etc as may be applicable.
<div>As Constructed - To Sanction</div>	Information as supplied by the current operator. Any discrepancies and inaccuracies in the drawing shall be brought to the attention of the architect in charge within 7 days of receipt.
<div>Approved but not Constructed</div>	



ARCHITECT
RAY SAMMUT & Associates ARCHITECTS & CIVIL ENGINEERS B.E. & A.(Hons), A. & C.E. No. 4, Ta' Xbiex Wharf, Ta' Xbiex, Malta Mob.(356)99814788 (356)99994542 E. raysammut27@gmail.com E. sammutnat@gmail.com www.raysammut.com

JOB TITLE	TUNA FARM OFF ST PAUL'S BAY
DRAWING TITLE	PLANS
CLIENT	D.G.Bjorn Callus obo D.H. Ministry for Agriculture, Fisheries, Food D.I. & Animal rights
LOCATION	Site off Sikka I-Bajda, Sikka I-Bajda, San Pawl il-Bahar

DATE	15.07.2022
REF. NO.	AFD423-004
SCALE	1:25,000
SIZES	A0
DRAWN	N.S.
APPROVED	N.S.
DRAWING NO.	110
REVISION NO.	00

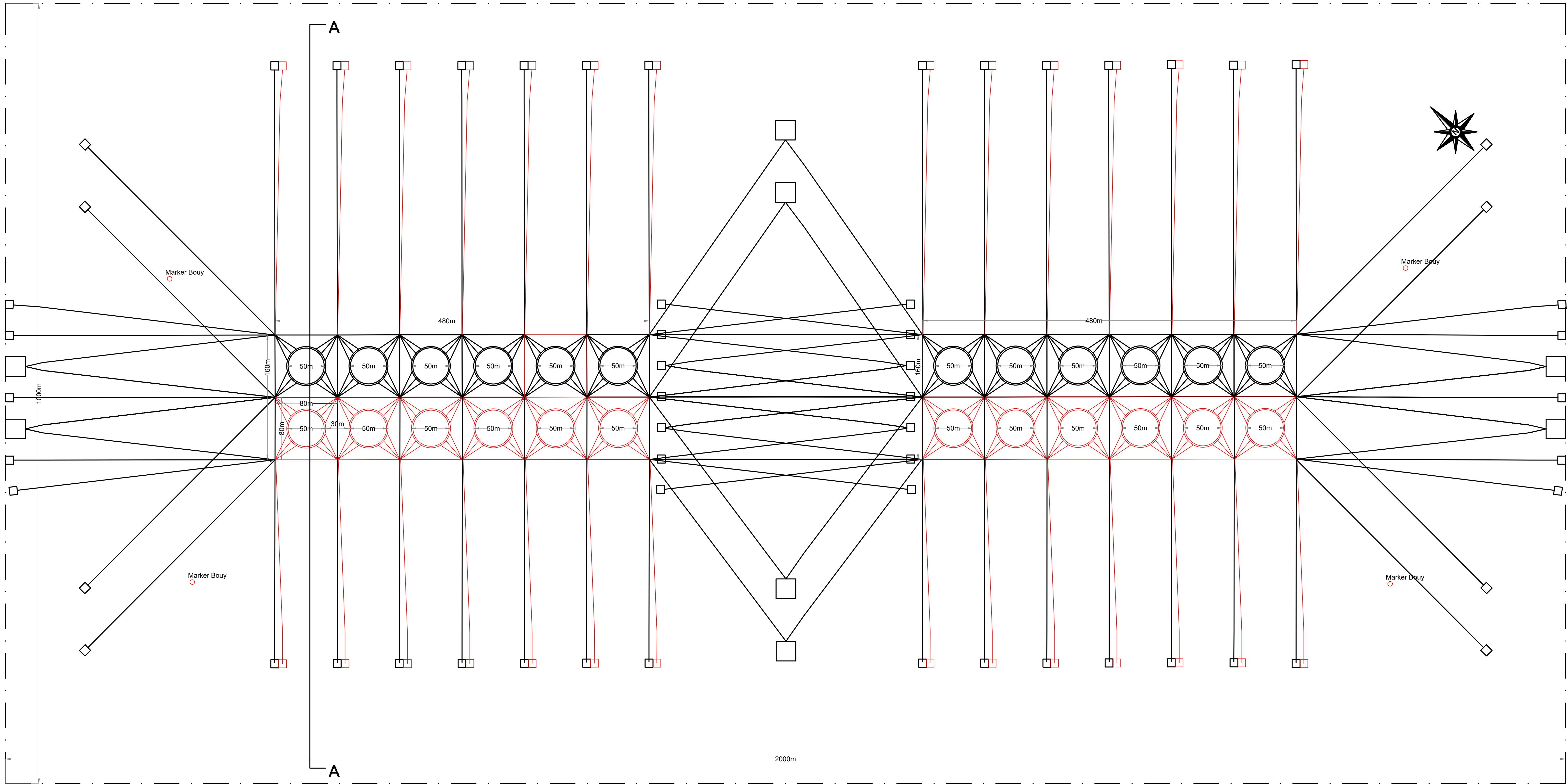


Approved Plan in PA/02175/18 - Temporary Tuna Farm
Scale 1:2500

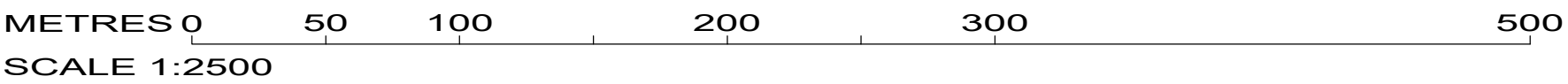
METRES 0 50 100 200 300 500
SCALE 1:2500

<div>Legend</div> <div><div>Construction Proposed</div><div>Demolition Proposed</div><div>As Constructed - To Sanction</div><div>Approved but not Constructed</div></div>	<div>Notes</div> <div><div>-Do not scale from this drawing.</div><div>-This drawing is to be read in conjunction with other architectural, structural and services drawings or other consultant's documentation, permit conditions etc as may be applicable.</div><div>-Information as supplied by the current operator. Any discrepancies and inaccuracies in the drawing shall be brought to the attention of the architect in charge within 7 days of receipt.</div></div>	<div><div><div><div><div></div><div>RAY SAMMUT & ASSOCIATES</div><div>ARCHITECTS & CIVIL ENGINEERS</div></div></div></div></div>	<div>ARCHITECT</div> <div><div><div>RAY SAMMUT & Associates</div><div>ARCHITECTS & CIVIL ENGINEERS</div><div>B.E. & A.(Hons), A. & C.E.</div><div>No. 4, Ta' Xbiex Wharf, Ta' Xbiex, Malta</div><div>Mob.(356)99814788 (356)99994542</div><div>E. raysammut27@gmail.com</div><div>E. sammutnat@gmail.com</div><div>www.raysammut.com</div></div></div>	<div><div><div>JOB TITLE</div><div>TUNA FARM OFF ST PAUL'S BAY</div></div><div><div>DRAWING TITLE</div><div>PLANS</div></div><div><div>CLIENT</div><div>D.G.Bjorn Callus obo D.H. Ministry for Agriculture, Fisheries, Food D.I. & Animal rights</div></div><div><div>LOCATION</div><div>Site off Sikka I-Bajda, Sikka I-Bajda, San Pawl il-Bahar</div></div></div>	<div><div><div>DATE</div><div>15.07.2022</div></div><div><div>REF. NO.</div><div>AFD423-004</div></div><div><div>SCALE</div><div>1:2500</div><div>SIZE</div><div>A0</div></div><div><div>DRAWN</div><div>N.S.</div><div>APPROVED</div><div>N.S.</div></div><div><div>DRAWING NO.</div><div>100</div><div>REVISION NO.</div><div>00</div></div></div>
---	---	--	--	---	--



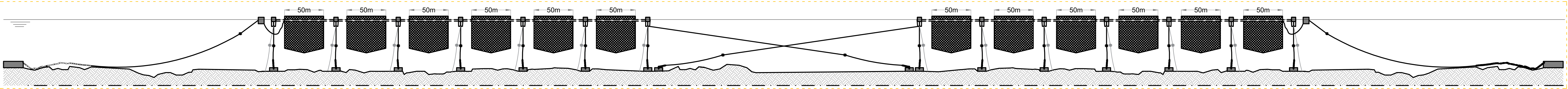


Proposed Plan - Permanent Tuna Farm
Scale 1:2500



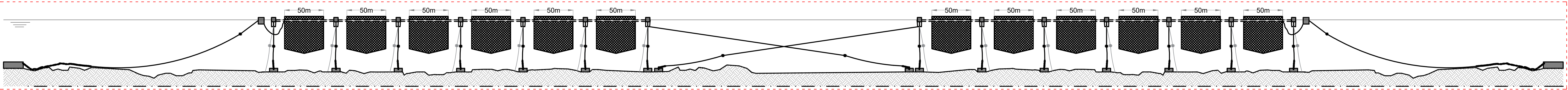
<div><div>Legend</div><div><div>Construction Proposed</div><div>Demolition Proposed</div><div>As Constructed - To Sanction</div><div>Approved but not Constructed</div></div></div>		<div>Notes</div> <div><div>-Do not scale from this drawing.</div><div>-This drawing is to be read in conjunction with other architectural, structural and services drawings or other consultant's documentation, permit conditions etc as may be applicable.</div><div>-Information as supplied by the current operator. Any discrepancies and inaccuracies in the drawing shall be brought to the attention of the architect in charge within 7 days of receipt.</div></div>		<div><div>ARCHITECT</div><div><div>RAY SAMMUT & Associates</div><div>ARCHITECTS & CIVIL ENGINEERS</div><div>B.E. & A.(Hons), A. & C.E.</div><div>No. 4, Ta' Xbiex Wharf, Ta' Xbiex, Malta</div><div>Mob.(356)99814788 (356)99994542</div><div>E. raysammut27@gmail.com</div><div>E. sammutat@gmail.com</div><div>www.raysammut.com</div></div></div>		<div><div>JOB TITLE</div><div>TUNA FARM OFF ST PAUL'S BAY</div><div><div>DRAWING TITLE</div><div>PLANS</div></div><div><div>CLIENT</div><div>D.G.Bjorn Callus obo D.H. Ministry for Agriculture, Fisheries, Food D.I. & Animal rights</div></div><div><div>LOCATION</div><div>Site off Sikka I-Bajda, Sikka I-Bajda, San Pawl il-Bahar</div></div></div>		<div><div>DATE</div><div>15.07.2022</div><div><div>REF. NO.</div><div>AFD423-004</div></div><div><div>SCALE</div><div>1:2500</div><div><div>SIZE</div><div>A0</div></div></div><div><div>DRAWN</div><div>N.S.</div><div><div>APPROVED</div><div>N.S.</div></div></div><div><div>DRAWING NO.</div><div>110</div><div><div>REVISION NO.</div><div>00</div></div></div></div>	
---	--	---	--	--	--	--	--	--	--





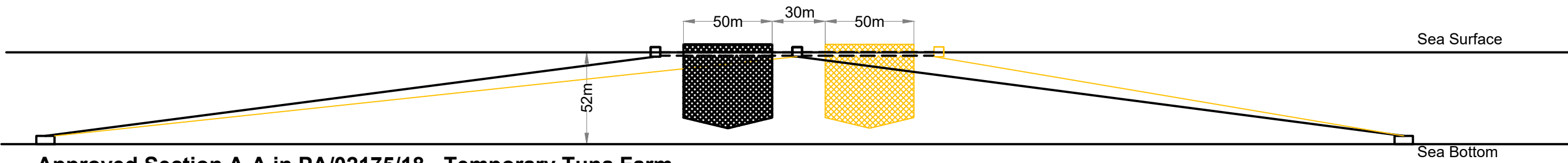
Approved Anchoring Detail in PA/02175/18 - Temporary Tuna Farm

Scale : 1 : 2500



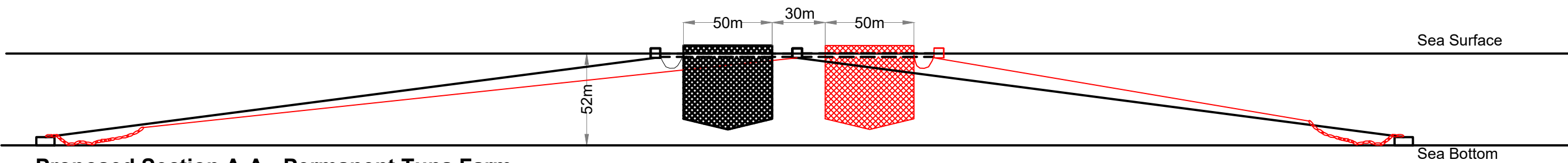
Proposed Anchoring Detail in PA/02175/18 - Permanent Tuna Farm

Scale : 1 : 2500



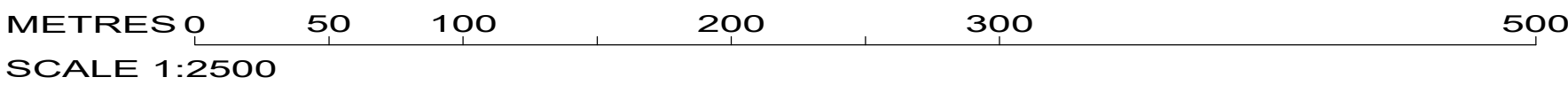
Approved Section A-A in PA/02175/18 - Temporary Tuna Farm

Scale : 1 : 2500



Proposed Section A-A - Permanent Tuna Farm

Scale : 1 : 2500



Legend

- Construction Proposed
- Demolition Proposed
- As Constructed - To Sanction
- Approved but not Constructed

Notes

- Do not scale from this drawing.
- This drawing is to be read in conjunction with other architectural, structural and services drawings or other consultant's documentation, permit conditions etc as may be applicable.
- Information as supplied by the current operator. Any discrepancies and inaccuracies in the drawing shall be brought to the attention of the architect in charge within 7 days of receipt.



ARCHITECT

RAY SAMMUT & Associates
ARCHITECTS & CIVIL ENGINEERS

B.E. & A.(Hons), A. & C.E.
No. 4, Ta' Xbiex Wharf, Ta' Xbiex, Malta
Mob.(356)99814788 (356)99994542
E. raysammut27@gmail.com
E. sammutnat@gmail.com
www.raysammut.com

JOB TITLE

TUNA FARM OFF ST PAUL'S BAY

DRAWING TITLE

SECTIONS

CLIENT

D.G.Bjorn Callus obo
D.H. Ministry for Agriculture, Fisheries, Food
D.I. & Animal rights

LOCATION

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

DATE

15.07.2022

REF. No.

AFD423-004

SCALE

1:2500

DRAWN

N.S.

DRAWING No.

120

SIZE

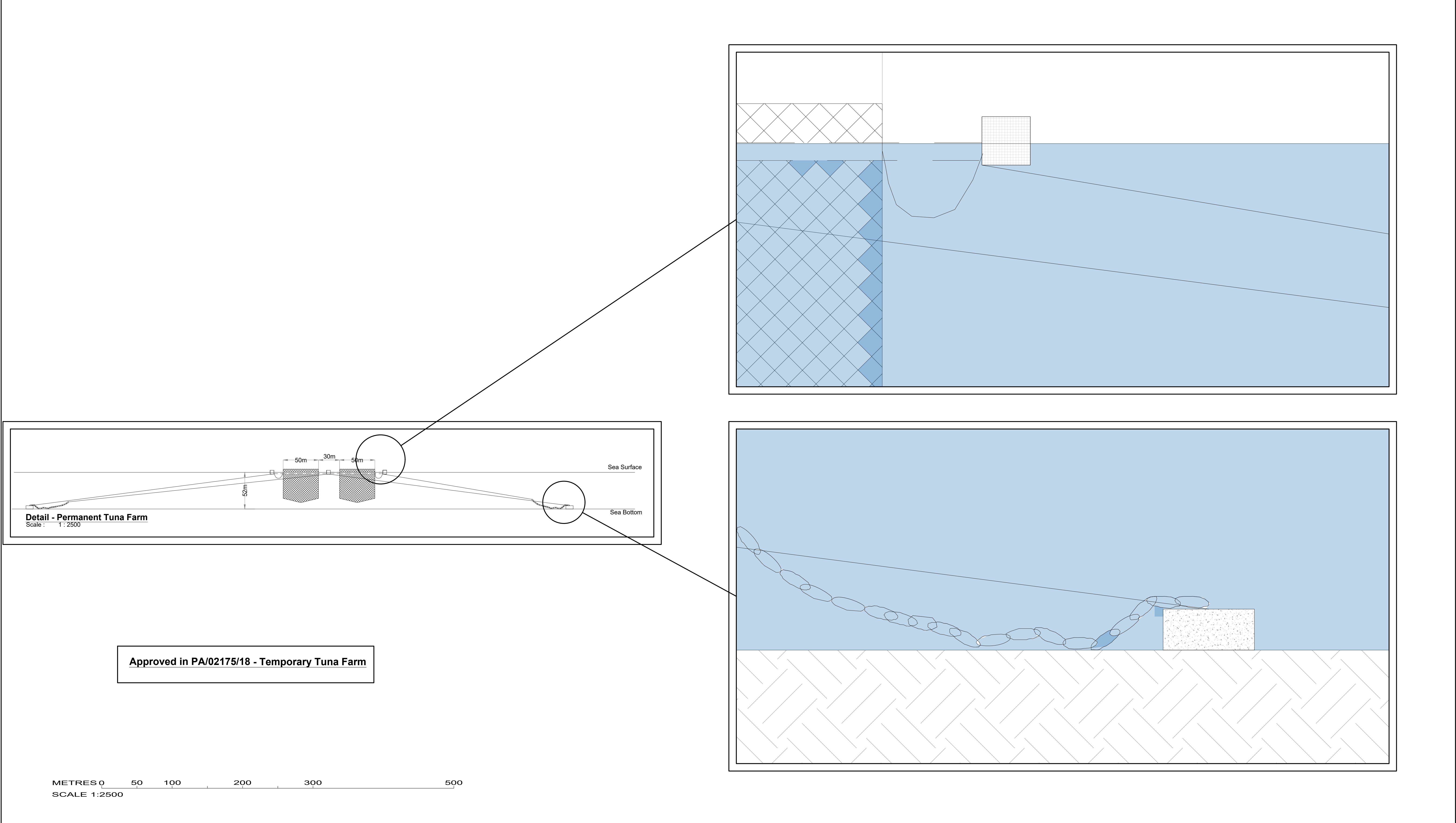
A1

APPROVED

N.S.

REVISION No.

00



<div><div>Legend</div><div><div>Construction Proposed</div><div>Demolition Proposed</div><div>As Constructed - To Sanction</div><div>Approved but not Constructed</div></div></div>	<div><div>Notes</div><div><div>-Do not scale from this drawing.</div><div>-This drawing is to be read in conjunction with other architectural, structural and services drawings or other consultant's documentation, permit conditions etc as may be applicable.</div><div>-Information as supplied by the current operator. Any discrepancies and inaccuracies in the drawing shall be brought to the attention of the architect in charge within 7 days of receipt.</div></div></div>	<div><div><div><div></div><div>RAY SAMMUT & ASSOCIATES</div><div>ARCHITECTS & CIVIL ENGINEERS</div></div></div></div>	<div><div>ARCHITECT</div><div><div>RAY SAMMUT & Associates</div><div>ARCHITECTS & CIVIL ENGINEERS</div><div>B.E. & A.(Hons), A. & C.E.</div><div>No. 4, Ta' Xbiex Wharf, Ta' Xbiex, Malta</div><div>Mob.(356)99814788 (356)99994542</div><div>E. raysammut27@gmail.com</div><div>E. sammutnat@gmail.com</div><div>www.raysammut.com</div></div></div>	<div><div><div>JOB TITLE</div><div>TUNA FARM OFF ST PAUL'S BAY</div><div>DRAWING TITLE</div><div>Detail</div><div>CLIENT</div><div>D.G.Bjorn Callus obo D.H. Ministry for Agriculture, Fisheries, Food D.I. & Animal rights</div><div>LOCATION</div><div>Site off Sikka I-Bajda, Sikka I-Bajda, San Pawl il-Bahar</div></div></div>	<div><div><div>DATE</div><div>15.07.2022</div><div>REF. No.</div><div>AFD423-004</div><div><div>SCALE</div><div>1:2500</div><div>SIZE</div><div>A1</div></div><div><div>DRAWN</div><div>N.S.</div><div>APPROVED</div><div>N.S.</div></div><div><div>DRAWING No.</div><div>120</div><div>REVISION No.</div><div>00</div></div></div></div>
---	---	---	---	---	---