

Meeting	EIA Public Consultation in relation to the following proposal: TRK 219142 – GF 00250/07: New Aquaculture Zone in the North of Malta
Date	12 th February 2019
Duration	17:49 – 19:40
Location	Maritim Antonine Hotel and Spa, Mellieħa
ERA representatives	Mr. Kevin Mercieca, Ms. Josianne Abela Vassallo, Ms. Leonora D'Amato
Minutes taken by	Ms. Charmaine Zerafa (ERA)

Mr. Kevin Mercieca opened the meeting giving details about the proposed development which is currently subject to an Environmental Impact Assessment (TRK 219142 – GF 00250/07: New Aquaculture Zone in the North of Malta).

Details vis-à-vis the purpose of the meeting were provided, in particular that the meeting was part of the EIA process. It was also clarified that this was not the decision-taking meeting but was being held to present the EIS findings and to gather feedback from the public in due time for any relevant considerations to be factored in during the process.

The public was also informed that proceedings shall be recorded and that comments can be put forward in an anonymous manner.

Mr. Adrian Mallia on behalf of ADI Associates delivered a presentation explaining the studies carried out as part of the EIA.

Mr. Kevin Mercieca opened the floor for comments after the presentation.

Mr. Nick Abela (“Stop the Slime”).

It has been mentioned that the aquaculture zone in question shall be located further out in respect to the location currently occupied by the fish farms. The exact location should be clarified including the exact points from where the distance from shore is being measured. From the studies and plans presented, it does not seem that there will be a significant increase in such distance.

The fact that the fish farms are relocated further offshore would not solve the problem of slime hitting our shores. This has been confirmed in previous years when farms were moved offshore by 5km, however the issue of slime persisted.

Another point that one has to note is that the proposed location is a marine protected area. Analyzing previous studies carried out by ADI Associates with respect to another pending application for the increase of pens (from 12 to 24) at the current temporary location one can further understand the amount of waste being generated by these fish farms. In such studies it was stated that 24 cages with a minimum quota of 3,200 tonnes result in 660kg of uneaten baitfish daily meaning 6.6 tonnes of fish oil every day. Also it was explained that 125 tonnes

of food is eaten daily by tuna, so one can only imagine the amount of excreta generated which ultimately ends up in our sea and on our seabed. This proposal is for 5000 tonnes of biomass, an increase of 1800 tonnes, meaning that the amount of waste generated will increase drastically. We are looking at 1 tonne of uneaten bait fish, 10 tonnes of fish oil and 195 tonnes of food eaten daily.

Last year we were hoping that the situation would get drastically better with the moving further offshore of the fish farms and the increase in monitoring and control. However, only a few months ago, all fish farm operators were fined for breaching permit conditions.

One has to keep in mind that fish farms have repeatedly declared amounts and numbers which do not comply with regulations, so the amounts being now declared, are they really these amounts. Previous experience proves otherwise.

At the end of summer the Federation representative, Mr. Refalo, confirmed that they cannot guarantee slime free beaches and now we are looking at yet another increase.

Mr. John Buttigieg (Mellieħa Local Council).

Should the North Aquaculture zone be approved? Will the existing penning farm move to such zone?

Mr. Kevin Mercieca (Environment and Resources Authority).

It must be clarified that this is not a decision taking forum and that currently there is still no formal planning application with regards to such. At this stage, studies were carried out for this particular area to assess environmental related impacts.

The intention is that the present fish farms will be moved to such location.

Mr. John Buttigieg (Mellieħa Local Council).

Clarification whether the studies carried out, included the frequency of the currents in the area, whether they are mostly north bound currents or south bound currents.

Mr. Kevin Mercieca (Environment and Resources Authority).

Extensive studies and modelling were carried out including studies with respect to waves, currents and the way particles and waste move from the farms.

Mr. Adrian Mallia (ADI Associates).

Readings in relation to waves, currents and winds were taken over a long period of time. Although the model presented mentions specific dates, one has to note that these are the worst case scenarios. All details are included in the EIA documents.

Mr. Joseph Attard (Mellieħa Local Council).

As per the presentation given, such modelling confirms that waste and slime will always end up at shore. Increasing the tonnage will definitely increase the amount of waste.

Mr. Adrian Mallia (ADI Associates).

The modelling presented shows the worst case scenario, that is with no intervention at all to stop waste and slime run off from the fish farms. The emphasis of the study is that oils and waste do not leave the farm and are stopped at source.

It must be noted that this proposal is by the Department and not by a specific operator. For this instance, it cannot accommodate one operator thus the reason for the increase in biomass in such zone. This is an Aquaculture zone and not a tuna farm. Today we are looking at the penning of tuna however in the future there may be the possibility of having other type of fish. At this point in time, the only real possibility of farming in such location is that of tuna however one cannot be sure if this will remain the same in the future.

If this aquaculture zone is approved, the current tuna farms would be relocated to such zone with the possibility of a potential increase in the number of cages.

Distances mentioned in the studies focus on urban locations. In fact distance from Qawra Point is being increased by around 2km.

Mr. Nick Abela (“Stop the Slime”).

We cannot understand why the tonnage is once again being increased considering that we are already facing a lot of problems with the current capacity.

Mr. Godfrey Bartolo (Marine sports industry).

One must admit that the current situation has improved and that operators are doing a good job at cleaning any oil presence. When informed of such pollutant the operator is on site within minutes and does the necessary clean up. This is however with one operator responsible for the tuna farms in the area. With more operators, it will be more difficult to identify which farm/operator is responsible. For us the location does not make any difference as long as the tonnage capacity does not increase as this will surely increase the problem. The Department should limit the tonnage capacity with respect to tuna; maybe one can consider using the extra capacity for different fish species.

Mr. Kevin Mercieca (Environment and Resources Authority).

The studies carried out have been undertaken on the proposal being presented to us. The service the operators are providing in collecting any marine litter is part of the efforts by the ERA in regulating such fish farms. Conditions in the environmental permits have been included in order to impose these types of procedures by the operators. It must be clarified that should there be more than one operator they would still be obliged to provide such clean up related services. Permits stipulate that there should be one contact number and that such service is coordinated between all operators. Such practice is already being carried out for the South Aquaculture zone.

Ms. Ann Fenech (St. Paul’s Bay Local Council).

It was stated earlier on during the presentation that the oils escaping from the farms cannot be fully controlled, so what guarantee is there that you will be able to control the additional pens being proposed. Further information should be provided with respect to the disposal of fish once these are caught to be transported. Will all the remains of said fish end up at our shores? Last year we saw a positive difference with regards to the matter of pollutants hitting our shore. In St. Paul’s Bay this has been a major issue and residents are concerned that we will once again suffer with this new proposal.

Mr. Nick Barbara (Birdlife Malta).

After reviewing the studies carried out, it has been noted that there is the possibility that some tuna are kept beyond the normal rearing period. Is the impact assessment taking into consideration such aspect and the effects that may arise during the whole year and not only during the period when the main activities are taking place?

Unfortunately the EIA does not include impacts on the Shearwater species which are very present in the area around the Gozo Channel. There is a degree of uncertainty when it comes to the impacts on sea birds. In this instance, we have to stress about the issue of monitoring, which unfortunately from previous experiences we can say that this is taken lightly even if imposed by the authorities and is not being undertaken.

Mr. Adrian Mallia (ADI Associates).

The issue of keeping tuna as carryover is not a right the operators have and in order to be able to do so they have to seek permission from the Department. The maximum amount that can be kept is up to 15%. In the circumstance that such carryover takes place, it must be noted that the activity taking place in the fish farms is much less during the winter period due to changes in the physiology of the fish. The Department would need to look further into such matter.

In terms of the impact on Scopoli's (shearwater), this was not elaborated being that from the information we have the identified, the area is not popular with this species. This does not mean that it was not looked into and one has to note that there is also an Appropriate Assessment that includes impacts on birds.

With regards to comments vis-à-vis monitoring I agree with you that this was being taken lightly. Unfortunately the monitoring program fell behind due to long discussions being carried out to be able to come up with a final monitoring program. This has now been agreed upon and monitoring is about to start. The bird element is also included in this monitoring program whereby training will also be provided to the operators with regards to bird species, injured birds handling etc.

Mr. Emi Farrugia (One journalist, TV producer and personal assistant to the Chairman of Professional Divers School Association).

Whatever the location of these farms, should there be a run-off at some point in time this will reach the shore. It was stated that the capacity increase from 3000 to 5000 tonnes may be occupied by other species of fish, however it has to be stated that the probability that such capacity is once again occupied by tuna is very high due to location and other conditions. At this stage, it cannot be understood why the biomass is being increased prior to confirming that run off risks are very low if not eliminated.

The new location being proposed may result in much more difficulty for operators to be able to adhere to requested measures and control in view of stronger currents and increased depths.

Hon. Clayton Bartolo (Member of Parliament).

One has to acknowledge the positive impact of fish farms on the country's economy. This application entails an increase in biomass from 3000 tonnes to 5000 tonnes, an increase with

which I do not agree. At this point in time, the location in question is only suitable for the farming of tuna. We do not know what will be the situation with this increase. The proposal to relocate the existing fish farms in a designated aquaculture zone is a good idea however the increase is not necessary. The impact of such fish farms does not only affect Mellieha but also St. Paul's Bay, St. Julians and Sliema. These locations are very popular with tourists and a negative impact will ultimately result in a negative effect on the economy.

Dr. Charlon Gouder (The Maltese Federation of Aquaculture Producers).

The main question one should be discussing is whether the location in question is viable and whether it is actually good for such fish farms. Was the impact on operators taken into consideration? As explained, this new location has different conditions (e.g. deeper than current location), was it considered that such aspects may influence other aspects like insurance coverage, safety and mooring options. *Prima facie*, it seems that conditions present at the new site are still very questionable.

We have to acknowledge that this industry has made a lot of improvements in recent years. One example is the disposal of offal (internal organ waste). As a federation we are pushing to have a treatment plant in place to handle the disposal of such type of waste.

We do agree that there are still some issues to be taken care of but it must be noted that not all inconveniences present at sea are a result of fish farms.

Mr. Kevin Mercieca (Environment and Resources Authority).

The study in question is related to impacts on the environment. Other issues mentioned, like safety etc., although very important, are not within this particular study's remit. Other competent authorities shall be looking into such aspects and study these issues.

Mr. Emi Farrugia (One journalist, TV producer and personal assistant to the Chairman of Professional Divers School Association).

The location in question may be the reason for environmental related disasters due to the fact that it may be much harder to work in the new conditions, mainly due to increased heights. The mentioned heights will definitely make it much harder for repairs to be done on the submerged cages and mooring.

Mr. Adrian Mallia (ADI Associates).

Previous years showed that when forced to relocate to new areas with a deeper seabed, with advancements in technology and updating of systems operators managed to make these locations viable. Methods and systems may need to be changed in order to make the new location viable.

Mr. Kevin Mercieca closed the meeting by confirming that the points raised have been recorded and noted. He also thanked the participants and invited them to send any further comments, preferably by email to eia.malta@era.org.mt, or by post to 'The Director, Environment and Resources Authority, Hexagon House, Spencer Hill, Marsa', by 19th February 2019.