

Meeting	EIA Public Consultation for EIA in relation to the following development permit application: PA 02175/18 - Proposal to consolidate temporary tuna farming area at a parcel of sea approximately 5 kilometers from the shore (in general area approved for PA 3072/17 and PA 5858/17) for a total biomass of 3,300 tonnes of fish. Site off Sikka l-Bajda, Sikka l-Bajda, San Pawl il-Bahar, Malta
Date	11 th September 2018
Duration	18:20 – 21:00
Location	Qawra Palace Hotel, San Pawl il-Baħar
ERA representatives	Kevin Mercieca (Deputy Director) ; Leonora D’Amato (Officer)
Minutes taken by	Charmaine Zerafa (Administrative Assistant)

Mr. Kevin Mercieca opened the meeting giving details about the proposed development which is currently subject to an Environmental Impact Assessment (EIA) (*PA 02175/18 - Proposal to consolidate temporary tuna farming area at a parcel of sea approximately 5 kilometers from the shore (in general area approved for PA 3072/17 and PA 5858/17) for a total biomass of 3,300 tonnes of fish. Site off Sikka l-Bajda, Sikka l-Bajda, San Pawl il-Bahar, 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 EIA findings and to gather feedback from the public in due time for any relevant considerations to be factored in during the process.

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 campaign).

During the presentation given it was stated that the oil and slime is more of a nuisance and the ecological impact is considered to be of minor to no significance. According to a report compiled by the Department of Fisheries, The Planning Authority and the Environment and Resources Authority released on 26th August 2016, the slime was considered as an imminent danger to the environment. Such report drawn by three official government entities and the presentation / studies provided do not tally.

The studies carried out do not include any reference to health risks. We have several reports from dermatologists that suggest immediate washing with soap if contact with the slime occurs as this may cause skin irritation.

This application is referring to an average of 3,300 tonnes of biomass divided between 24 nets. This means that there is the opportunity of an increase. An increase in biomass equals to an increase in tuna meaning an increase in feed. This would automatically result in an increase in slime.

In spite of all the mitigation measures which have been introduced (vessels, booms, skimmers etc.), this summer we are still suffering the effects of the oil slicks and slime. We had two years since the first report of slime, and the issue has not been fully sorted. What guarantee do we have that with this application this problem will be actually solved?

Mr. Kevin Mercieca (Deputy Director; ERA)

While the EIA process takes into consideration some elements of effects on human population, the primary aim of the EIA process is to see the impacts on the environment.

Mr. Adrian Mallia (ADI)

With regards to the mentioned report one has to note that such report is dated 26th August 2016 meaning few days before the permit were revoked. At that point in time there was no certainty as to what was being dealt with and to the difference between foam and slime. As a marine ecologist I would be very hesitant to declare whether there is an impact or no.

The impact doesn't seem to be high on the environment being that the slime is a natural product. With regards to the health issues, as Mr. Mercieca already explained the EIA studies do not include any health related studies. Such studies can be done should the requirement arise from the Environment Health Department.

In order to eliminate the nuisance from slime we have to make sure that the mitigation measures are adhered to. It is impossible to eliminate the generation of slime as feeding is required. However certain good practices in order to make sure that the slime is contained within the fish farm can be followed up e.g. not feeding in stormy weather and making sure not to overfeed.

The issue of biomass and number of cages is not a simple equation. Sometimes a cage may have less tonnes than other cages as fish from different origins have to be kept in different cages. Also one has to keep in mind that the 3,300 quota is set by the ICAT and this refers to the tonnage at caging.

Mr. Nick Abela (Stop the Slime campaign)

Being that the number of pens has increased there is the possibility of increase in tonnage. I would assume that the operator would take this opportunity.

Mr. Adrian Mallia (ADI)

The maximum biomass allowed by ICAT is 3,300 at caging time.

Mr. Emy Farrugia (TV Producer)

I carry out several trips and have also swam in the mentioned tuna farms and was never alerting of any skin problems resulting from swimming with such fish. I agree that the slime is a nuisance and the utmost needs to be done so that this is controlled or better eliminated. With regards to feed one has to note that the uneaten feed helps the marine environment and attires other marine creatures.

Mr. Nick Abela (Stop the Slime campaign)

It has to be noted that Mr. Emy Farrugia has a commercial relationship with the applicants.

Public individual (1)

It is useless to impose several mitigation measures if these are not properly enforced.

Public individual (2)

In the studies it is being stated that the South Aquaculture Zone is full and cannot cater for more fish farms. Can you please explain why this zone is being considered as full? One of the maps shows that the fish farm is located within a protected area (marked in brown shading), if the area is legally protected shouldn't it be left clear of any activity? Said fish farm is being located approximately 5km offshore. Why not more? Why not for example at 50km?

Mr. Kevin Mercieca (Deputy Director; ERA)

With regards to the South Aquaculture Zone, one has to note that this specific site is defined by a set of coordinates. The area within the said coordinates is currently full of fish farms and this is why the south zone is being considered as full. For an area to be designated for a specific activity one has to take into consideration several aspects like depth, other activities in the area etc.

The fact that an area is protected does not mean that no activity/development can be allocated there. It depends on the type of protection and the type of activity/development being proposed.

Public individual (2)

There is always the possibility to revise the designated area in the South and make it larger to accommodate more fish farms.

With regards to the North area it was communicated that due to the AFM activity such fish farm cannot be moved further to the East. But why not moving it further to the North?

One has to keep in mind that if the farm is moved further away this would mean further away from the boating activity, eliminating any dangers (from ropes etc) and possible accidents.

Public individual (3)

I am not against the industry owned by the applicants but it has to be made sure that such business is not carried out at the cost of nuisance to the general public.

It should be considered to relocate all the fish farms facing Dingli instead of facing the northern part of Malta. Should there be any slime leakage this would other move out of Malta's seas or end up against the cliff without causing any nuisance to the general public.

Mr. Kevin Mercieca (Deputy Director; ERA)

The reason why the eastern coast is being preferred is due to the fact that this is much more sheltered and also due to the depth of the seabed.

Mr. Adrian Mallia (ADI)

The South Aquaculture Zone is covered by a Development permit and as per all development permits this is issued for a specific set area. Such application is also linked to a maximum biomass. The allocated biomass has already been taken up by the fish farms already present in the area. For these reasons the South Aquaculture Zone is being considered as full.

In terms of the North Aquaculture Zone we are looking into moving further offshore but it has to be noted that the further out you go on the North East coast the depth of the water becomes very deep very quickly. Operating at a much deeper area is definitely more challenging and the further offshore you are the more you are exposed.

The proposal being studied is on this site because it is lined to the existing permit which is for a temporary location until a decision with regards to the North Aquaculture zone is taken. This is an EIA carried out based on a proposal made by the private sector which is limiting the depth to 100 metres, the proposal by the Department of Fisheries and Aquaculture does not have such depth limit.

Moving further away from Malta could result in being closer to Gozo, and the distance from Gozo could become shorter. This would then result in a constraint being that the minimum distance set by the Planning Authority is set to 5km.

Public individual (2)

Talking about the North coast we are talking about length of rope that will make the difference. Dropping a weight into a deeper area should not be difficult.

Tuna season is in the summer months and being that tourism is one of the biggest industry factors for the Maltese economy we cannot afford having slime hitting the coast during such months.

Public individual (4)

If there is an outbreak is there a way that the whole fish farming industry collectively takes responsibility for the impacts on the environment, people etc.

Mr. Kevin Mercieca (Deputy Director; ERA)

The environmental permits linked to these sites are standardizing obligations on all fish farms. One of the conditions imposed with such permits are bank guarantees, which are forfeited if they do not meet performance standards.

Monitoring is also being carried out so that issues and problems are tackled immediately and authorities would be in a position to pin point to which farm may be causing slime leakages. Video surveys, water quality sampling and other research/ conditions are also imposed.

Public individual (2)

Another idea would be in having a shared fund between all fish farms to be used should a leakage occurs. This can be used for the necessary cleaning etc.

With regards to the booms is this a requirement by ERA and are all fish farms equipped with such booms?

Mr. Kevin Mercieca (Deputy Director; ERA)

It can be confirmed that the use of booms is a requirement of the Environmental permit issued by ERA and all fish farms are equipped with such booms.

Mr. Adrian Mallia (ADI)

It is important that complaints and comments are forwarded to the competent authorities so that the necessary action/ follow up is taken in due course.

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 Tuesday 18th September, 2018.