

**ERA Ref.:** EA/00001/21

**Description Proposal:** Proposed demolition of existing hotel and bungalows, part excavation, and re-erection of Hotel Class 3B at the San Niklaw Bay area and Holiday Villas Class 1 at Santa Marija Bay area. The proposed replacement Hotel and Holiday Villas will include ancillary facilities and amenities, including a Spa (class 3c), bars/lounges (class 4c), and restaurants (class 4d), berthing facilities (Class 3d); swimming pools; sewage treatment plant; reservoirs; complete upgrade of the infrastructure systems and back of house facilities. Extensive reinstatement of the natural ecological and existing disturbed terrain is proposed in both the San Niklaw and Santa Marija sites in accordance with the Gozo and Comino Local Plan

**Location:** Comino Hotel and Bungalows, Gżira ta' Kemmuna, Kemmuna, Għajnsielem

**Subject:** Table with recommendations and ancillary reasoned justifications provided by the public, government entities, E-NGOs and relevant local councils, during 30-day public consultation on Terms of Reference, on any matters that they wish to see included in the EIA terms of reference.

**Consultation period:** 03 March 2021 – 05 April 2021

No.:	From	Comments
1	Civil Protection Department  (email dated 04/03/2021)	<p>The applicant shall submit the fire safety report adhering to the <i>Design guidelines on fire safety for buildings in Malta</i>, CPD approved standards and the Laws and Regulations of Malta prepared by the fire safety competent engineer. The access and facilities for the fire service covering the whole project proposal as indicated in your subjoined correspondence, shall be included and referred directly to the CPD for consultation, feedback and the relevant clearance.</p> <p>Should the applicant or the Planning Authority fail to correspond directly on <a href="mailto:civilprotection@gov.mt">civilprotection@gov.mt</a>, the CPD will not be in a position to provide the consultation and subsequently any no objection.</p>
2	Malta Mycological Association  (email dated 04/03/2021)	<p>The authorities should consider imposing a fee for staying or visiting Comino for non-residents. That way the area will be better monitored and hopefully, the area is not continuously trashed, especially in the summer months. This is quite common worldwide in a lot of environmentally delicate areas. Just a suggestion.</p>
3	The Energy and Water Agency  (email dated 30/03/2021)	<p>Reference is made to EIA Terms of Reference Consultation for PA/04777/20 with regards to Proposed demolition of existing hotel and bungalows, part excavation, and re-erection of Hotel Class 3B at the San Niklaw Bay area and Holiday Villas Class 1 at Santa Marija Bay area.</p> <p>The following are comments from 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"><li>• The PDS outlines that it is envisaged that the scheme will achieve LEED Platinum rating. The Agency welcomes further information of how photovoltaic systems, other RES and energy storage will be integrated in the project.</li></ul>

		<p>Water:</p> <ul style="list-style-type: none"> <li>• The PDS outlines the various measures which are proposed in the development of the Hotel Class 3B at the San Niklaw Bay area and Holiday Villas Class 1 at Santa Marija Bay area which are considering various water conservation measures.</li> <li>• It is important that the EIA provides sufficient detail with regards the water demand by application for both the Hotel and Holiday Villas, including landscape irrigation requirements and freshwater pool requirements. The EIA should also provide sufficient detail with regards to the amount of wastewater assumed to be generated by wastewater type (divided by treated greywater and blackwater) at each site and the amount of reclaimed water which is planned to be reused by application.</li> <li>• The EIA should specify whether any groundwater sources are planned to be utilized for any applications within the development. In the case groundwater sources are planned to be utilizes, the MRA borehole registration number should be provided.</li> <li>• Further to the above comment, pools should be clearly defined as freshwater or saltwater and the pool refill and backwash streams should be considered in wastewater treatment and reclamation plan.</li> <li>• With regards to the comment on pg. 32 of the PDS (copied below) with regards the wastewater treatment and reclamation, it is important that the EIA process covers the existing and planned sewerage infrastructure in Comino to ensure the protection of groundwater sources, particularly if the wastewater treatment plant is sited outside the boundary of the application.</li> </ul> <p><i>The Applicant is in negotiations with Water Services Corporation to use the site of the waste water treatment plant currently found on Comino. The Applicant would upgrade the plant to be able to treat all sewage generated on Comino and WSC would be responsible for disposal of sludge. The treatment plant would however be the subject of a separate planning application.</i></p> <ul style="list-style-type: none"> <li>• Furthermore, since it is proposed that all the treated water from this wastewater treatment plant is planned to be reclaimed and <i>there will be no discharge to sea after treatment</i>, it is important that the EIA also includes the wastewater treatment plant, even if this is not within the boundaries of the development. The EIA should consider the use of reclaimed water from this wastewater treatment plant with respect to the protection of groundwater.</li> </ul>
4	<p>Superintendence of Cultural Heritage</p> <p>(email dated 05/04/2021)</p>	<p>Ref. Cultural Heritage Act 2019 (CAP 445)</p> <p>PA 04777/20 - Comino Hotel and Bungalows, Gzira ta' Kemmuna, Kemmuna, Ghajnsielem</p> <p>1.0 Preamble</p> <p>The site of the proposed development extends over a large tract of land within Comino, a relatively undeveloped island, which is immediately recognised for its iconic and scenic views reflecting the Maltese rural and cultural landscape. The proposed project would involve demolition of the existing hotel and bungalows, and the construction of a replacement hotel and holiday villas over a larger footprint than the existing.</p> <p>The proposal also includes the construction of amenities and berthing facilities, excavation for swimming pools, sewage treatment plant and reservoirs, hard landscaping, and the reinstatement of the natural terrain.</p> <p>2.0 Scope and Definitions of the EIA</p>

For the purposes of this document, cultural heritage is defined by Article 2 of the Cultural Heritage Act (2019). This includes movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, palaeontological and geological importance.

2.1 The study area shall include the total footprint of the proposed development.

2.2 In the context of this particular application, cultural heritage considerations consist of:

- The Chapel of Our Lady's Return from Egypt scheduled by the Planning Authority at Grade 1 (approximately 37 metres from site);
- St. Mary's Tower, scheduled by the Planning Authority at Grade 1 (approximately 919 metres from site);
- St. Mary's Battery, scheduled by the Planning Authority at Grade 1 (approximately 1,342 metres from site);
- The Isolation Hospital, a 19th century British construction (approximately 774 metres from site);
- The old Bakery (approximately 250 metres from site);
- The cemetery (approximately 368 metres from site);
- Skeletal material and Hellenistic amphora discovered in close proximity of the Comino Hotel and Bungalows in San Niklaw and within the site curtilage;
- A scatter of pottery found on the seabed of Santa Maria bay (approximately 30 metres from the Bungalow area);
- Large quantities of Classical pottery found adjacent to the scheduled Chapel (approximately 37 metres from the site);
- Iron anchor found off of Santa Maria bay (approximately 200 metres from shore);
- Late Roman skeleton and amphora (approximately 200 metres to the East of the Bungalows);
- Bronze Age pottery sherds (approximately 400 metres to the South of the site);
- Metal sword found on the seabed of Blue Lagoon;
- A known Roman lamp, Roman coin, Neolithic sherds, and a cave at unknown locations in Comino.

The above cultural heritage definitions and considerations are not to be considered as exclusive. The EIA must consider all other forms of cultural heritage, both known and unknown.

2.3 The Environmental Impact assessment will: -

- Describe the Cultural Heritage assets within the study area;
- Analyse the cultural heritage features within the context of the cultural landscape;
- Assess the physical, spatial and visual impacts of the proposed development on the cultural heritage assets;
- Propose corrective measures for the protection of the cultural resources.

### 3.0 Methodology

In quantifying the cultural heritage assets within the study area, and assessing the impacts of the proposed development, the EIA will undertake:

- Description and assessment of the site;
- Desktop and archival research on all of Comino island;
- Fieldwork and research, including inspection by divers of the seabed within Santa Maria and San Niklaw bays and 50m off the rocky coastline of the site, "field walking" within site curtilage, topographic survey and remote sensing as may be necessary within the site. All fieldwork has to be authorised by the Superintendence of Cultural Heritage as defined below under point 4;

		<ul style="list-style-type: none"> <li>• Consultations with any relevant bodies, including the Superintendence of Cultural Heritage, Heritage Malta, the University of Malta, NGOs and Local Councils;</li> <li>• Compilation of an inventory of the cultural heritage assets identified within the study area. The features of cultural heritage are to be described and plotted with grid references, on Data Capture Sheets, the design of which should be approved in advance by the Superintendence of Cultural Heritage. The Data Capture Sheets will be presented as an appendix to the EIS. The analysis of the features will be included in the main report;</li> <li>• A cultural heritage Risk Assessment Map examining the various impacts of the proposed project is to be included in the EIA.</li> </ul> <p>4.0 Authorisation by the Superintendence of Cultural Heritage</p> <p>As per Cultural Heritage Act 2019, any form of investigation or prospection required for the identification of cultural heritage (including excavation, field walking, topographic survey and remote sensing) may only be undertaken by the Superintendence of Cultural Heritage or with its written approval.</p>
5	<p>Member of the Public</p> <p>(email dated 05/04/2021)</p>	<p>I went through the document for the EIA, I'm especially worried about the area of San Niklaw and Santa Marija sites, it's quite clear from the proposal as per plan, pictured below that the area footprint will be much larger than the comino and gozo local plans allow and the effect on the area will be of great concern for future generations. Future generations will find Comino more built up than it is today with no improvement.</p>  <p>The area is also marked as touristic as per local plan i.e. POLICY GZ-Ghjn-8 and not residential i.e. Class 1, lets not create a village on comino but leave as a special touristic destination for both foreigners and Maltese a break from what we call normal, charging a premium to tourists and locals for its special location surrounding nature a unique escape.</p>

		<p>Having people living all year round will have a great effect on the environment as they will need food/water/electricity/education/waste and transportation.</p> <p>From an environmental point of view I would like to understand more on these areas.</p> <ol style="list-style-type: none"> <li>1. Amount of proposed inhabitants i.e. residents in the santa maria bay area.</li> <li>2. Referencing the WMF - The amount of water proposed is around 69K litres per day this means a total of 25 million litres per year, can the water infrastructure of comino today supply all this water without affecting the environment. A study is needed on the water carrying capacity in comino. We can't take all the water as this is getting less and less as we all know. A proper water management plan is needed.</li> <li>3. In the proposal I'm not seeing any solar or wind additions, is the proposed 200MWh be non renewable? How much percentage of the power consumed will be renewable and generated on site. Can comino be carbon neutral.</li> <li>4. If the surrounding areas are disturbed can it be restored with an intervention instead of being built up maybe more trees and less buildings. It's clearly possible to remove concrete and place soil on rock, and have more nature than buildings. Do we need more buildings?</li> <li>5. The proposal should make use of the existing built footprint and not increase it further, lowering of the building in the rock will allow more units but save existing space while not increasing building heights. Existing units can be made smaller and terraced to blend in the environment.</li> <li>6. All transport methods approved should be green so there should be no ICE cars allowed on comino, any transport should be electric or using bicycles. There are currently no planned roads in comino. However as per GZ-Ghjn-11 improvement is needed, existing dirt roads fill the surrounding area with dust proper natural decomposed gravel paths should be built that don't change to dust on compression of use done by hotel vehicles or people. In the past when the hotel was open the van of the hotel used to kick up a dust storm that was terrible for tourists and locals who were walking on the road. We can clearly do much better.</li> </ol> <p>I hope my input will help plan things better and improve the area.</p>
6	<p>Ramblers' Association of Malta</p> <p>(email dated 05/04/2021)</p>	<p>Redevelopment Of The Comino Hotel &amp; Bungalows, Comino PA 04777/20 – Proposed demolition of existing hotel and bungalows, part excavation, and re-erection of Hotel Class 3B at the San Niklaw Bay area and Holiday Villas Class 1 at Santa Marija Bay area.</p> <p>Hereunder please find our comments regarding the subject proposed redevelopment.</p> <ol style="list-style-type: none"> <li>1. Our overriding concern is that the coastal perimeter is accessible to the general public, in line with CAP 16 Civil Code, as amended by ACT No. XXV of 2016(Public Domain Act). We note that there seems to be an attempt at keeping away from the foreshore in some areas. It is imperative that ALL the foreshore should be accessible to the public.</li> </ol>

		<p>2. There is some mention of an increase in the footprints of the bungalow site. The built footprint, of both the hotel and bungalows, should not be more than the existing footprint. Furthermore, the overall height of the buildings above sea level (irrespective of the number of storeys) should not be more than the existing height.</p>
7	<p>Malta Developers Association</p> <p>(email dated 05/04/2021)</p>	<p>The Malta Developers Association would like to put forward the following comments in regards to the open consultation in respect of the terms of reference for the EIA Report on PA 04777/20.</p> <ol style="list-style-type: none"> <li>1. As a preamble it is to be noted that Comino is a very small island, it is very sensitive and prestigious in nature, and is predominantly public land.</li> <li>2. Hence any development must take the following into consideration. <ol style="list-style-type: none"> <li>a. The Gross Floor Area should not be increased.</li> <li>b. Any development is to be limited to the current disturbed land and should only be carried out on the areas which are privately owned so as to prevent take up of ODZ public land.</li> <li>c. Comprehensive development should be given preferential consideration over piecemeal development. Piecemeal development and fragmented ownership often lead to bad planning issues. So far Comino has not been subjected to either piecemeal development or fragmented ownership, and one must ensure that any future development does not lead to that.</li> <li>d. The reason for development on Comino was purely for tourism purposes. Any future development should not depart from this scope.</li> </ol> </li> <li>3. Whilst acknowledging that the ROI on any tourism investment is in the long term and hence incentives may be order, one should first and foremost ensure that all incentives are available to the tourism industry at large and not limited to any specific project. Also, incentives should be primarily based on fiscal support similar to incentives applied across the board to other industries. Indirect incentives through real estate speculation should not be allowed.</li> <li>4. MDA reserves the right to give further comments at other stages.</li> </ol>
8	<p>BirdLife Malta</p> <p>(Late submission)</p>	<p>BirdLife Malta has reviewed the Project Description Statement (PDS) published February 2021, and attended the public consultation meeting held in March 2021 which provided an insight to the proposed redevelopment of the ex-Comino hotel at San Niklaw and Santa Marija Bays on Comino. The island of Comino is somewhat one of the last remote and less urbanized parts of the Maltese Islands, and gains from various degrees of protection ranging from Natura 2000 designations for the islands and its ancillary islets, as well as its surrounding waters. Regardless, the island has in recent years suffered immensely under unsustainable visitor pressure, mostly in the form of excessive tourism figures in the summer months impacting the most attractive parts of the islands, and bringing with them transportation-based disturbance, illegal camping and settlement, inappropriate waste management practices and the introduction of alien species, amongst other human-induced impacts to what should be a Natura 2000 site.</p> <p>On the other hand, the current inactivity of the hotel area and the onslaught of the pandemic have left the island less disturbed over the past months, and along with actions such as the removal of the informal camp-site at Santa Marija Bay, ongoing afforestation actions on the island, and a general less intense human presence have shown potential for restoration which is exhibited through interesting bird breeding records on the island and regenerating habitats in selected areas. As has been witnessed up until recently, the island is still vulnerable to abuse, at times from government institutions themselves, driven by the still alluring economic and touristic interest and potential of the island.</p>

A proper environment impact assessment exercise, if undertaken diligently and with a full understanding of the pressures and threats faced by the island, with a view of lessening these rather than accentuating them could result in a development which is more sensitive to the unique setting this development is sited within. Comino is home to internationally important populations of nesting seabirds, namely Yelkouan and Scopoli's Shearwaters, while its bird sanctuary status offers refuge to other nesting birds including other Annex 1 species such as the Short-toed Lark and the Short-eared Owl. The island hosts a plethora of habitats and maintaining the integrity of the ecosystems on the island is crucial to getting this Natura 2000 site to a favourable conservation status.

Following our review of the proposed development as described in the PDS, our recommendations for the EIA is to evaluate fully the potential and cumulative impacts on the following aspects which directly and indirectly may have an effect on the ecology of the island:

**a. Amenity value of the area:** Comino is heavily pressured by unsustainable tourism figures during the summer months. While it may appear that the hotel will have a reduction in guest rooms compared to the current setup, the amount of villas proposed for Santa Marija Bay exceeds the current setup and will likely result in a greater influx of visitors to the complex than what the complex has seen or supported in past years. The PDS does not seem to point out any estimated occupancy figures which would have been surely calculated by the investors in this initiative to make the project economically viable. The EIA should delve fully in the projected figures, with consultation with entities such as Ambjent Malta (AM), the Environment and Resources Authority (ERA) and the Malta Tourism Authority (MTA), on whether the proposed use for the area is within the carrying capacity of the island. The scale of impacts from the proposed development such as waste generation, energy consumption, transportation, light and noise pollution, etc are directly dependent on the projected number of visitors this development will be aiming to cater for.

In relation to the above, we foresee the following impacts that need to be addressed by the EIA:

**b. Visual impact and light pollution:** The PDS suggests that overall the development may increase in height, and therefore its siting within the landscape and its visual influence may be exerted over a larger expanse on the island and adjacent Natura 2000 sites than the current occupied volume of the hotel. Entertainment areas such as the mentioned 'village piazzas' are bound to be entertainment sources which will be probably lit up during the night. Lighting installations at sections such as the proposed open staircases and glass lifts, while possibly aesthetically pleasing, need to also be considered in terms of these becoming point sources of light at night. Comino island is home to a number of species which are sensitive to light pollution – these include nesting seabirds and other fauna. The EIA should therefore anticipate fully the visual impact and light pollution of the development during its construction and operational phases such as these do not exert any influence to sensitive receptors. These include areas in close proximity to the development such as shearwater colonies at Santa Marija caves, to seabird colonies further afar that utilize the marine SPA as well as nest at colonies as far as Ta' Cenc cliffs. Light pollution impact should also extend to any lit pathways connecting San Niklaw and Santa Marija developments.

**c. Noise and vibrations:** Similarly to the above, the various interventions on site which will see significant demolition, movements of heavy machinery, rock cutting, etc. are bound to cause noise and vibrations which might affect nesting seabirds in the area, especially if these are carried out during sensitive breeding periods. Such vibration/noise concerns are not only relevant to seabird colonies but also extend to other ground nesting birds on Comino such as the Short-toed Lark and Short-eared Owl for which Comino provides a safe habitat for such Annex I birds.

**d. Construction waste:** The development shall generate a substantial amount of construction waste which may need to be transported to be utilized or disposed elsewhere. While reutilization on site, especially on unutilized scars in the area (such as the mentioned tennis and volleyball courts) may help re-pristiniate the general morphology of the hotel sites, the end destination of disposed construction material needs to be identified at EIA stage. Comino cannot afford to have further construction waste scars inflicted, and neither should the availability of such material incentivize further speculation of the Natura 2000 site such as the constructions of quays, roads and similar undeserving infrastructure.

**e. Domestic waste:** Waste management at Comino, or rather its absence, is one aspect which indirectly effects the favourable conservation status of a number of species on the islands from flora to fauna such as nesting seabirds. Mismanagement of waste has sustained a healthy rodent population on the island for years impacting nesting success on the island, and to a certain extent has also affected the general landscape and regeneration potential of flora. The issue of domestic waste should be given importance throughout all phases of the development, including both construction and operational phases, and how this shall be tackled and managed effectively. Accumulation of waste during night time is to be avoided at all stages.

**f. Wastewater treatment:** It is likely the development shall re-utilise the extant wastewater treatment plan situated at Santa Marija Bay. The PDS however lacks any details on the proposed wastewater treatment strategy in detail. If such is the case, the impact to be exerted from the re-utilisation of this site needs to be fully assessed, especially with respect to the sensitive positioning of this plant at Wied l-Ahmar, with sensitive marsh-land and sand-dune habitats down-stream of such a plant. Any construction, outflow, noise, vibration, lights, etc may have a direct impacts on these habitats which are being slowly regenerated since ERA has clamped on the illegal use of the area as a campsite. The potential to integrate the use of treated water to compensate and aid restoration works should be also considered. Wastewater impacts should also be assessed at construction phase of the development, considering that an estimated 150 workers might be operational on site during this phase. The EIA should fully delve into what sanitary services shall be provided at this phase and how these shall be managed.

**g. Land transportation and routes:** The proposed development is divided between Santa Marija and San Niklaw Bays which are linked via a footpath, as well as a makeshift dust road linking the two. The hotel is also proposing to have mechanized transport linking the two areas of the hotel. Over past years, the continuous passage of poorly kept vehicles throughout these roads have been a continued source of dust emissions to adjacent habitats as well as erosion and deviation of surface runoff. The associated impacts which such activities need to be fully addressed in the EIA, including whether the development shall propose any more sustainable modes of transport. Full consideration should be made on the feasibility of surfacing frequently used access routes during the operational phase of the hotel, possibly ensuring surface runoff is utilized, treated or channeled appropriately such as the road network does not continue to impact any adjacent habitats. Needless to mention, the movement of materials and machinery during the construction phase of the project need to be also fully assessed in terms of their impact on this Natura 2000 site.

**h. Use of imported materials including landscaping:** While the use of natural local stone to be integrated in this development is commendable, the importation of various materials on the island, including from stone sources in other parts of the country or outside Malta needs to be fully assessed for the possible introduction of alien species indirectly. Transportation of soil and landscaping materials, including plants, can result in the involuntary introduction of species on the island which may have a damaging effecting on ecosystems. This may include transportation of diseases, seeds, fauna, eggs as well as possibly genetic variants of locally established species, which might compromise Comino's flora and fauna.

		<p>Any proposals to integrate landscape should identify at EIA stage the sources of where such materials will be sourced, and the possibility of in-situ propagation should be considered if covered by relevant nature permits and scrutiny by ERA.</p> <p><b>i. Renewable energy sources:</b> While the development is being aimed to eventually achieve a carbon neutral status, the installation of a solar panel farm on the island has been mentioned during consultation meetings. While the re-utilisation of areas such as the abandoned pig-farm might be possible, such intentions by the developer should be made clear, and any ancillary developments beyond the land concessions to the hotel need to be scrutinized accordingly for their impact on Comino away from the hotel site. While carbon neutral operation of the hotel would be a commendable approach, the positioning of a solar farm on the island might not be commensurate with the management of the island to achieve a re-pristination of its habitats. The EIA should delve into all possible alternative of siting such a solar farm, including its positioning off Comino so as not to impinge on the visual, ecological and restoration potential of the island.</p> <p><b>j. Electrical substation:</b> Similar to the above, should the development require an upgrade in electrical supply to the island, the associated impacts with upgrading the existing substation and any necessary ducting that might be accompanied with such an upgrade need to be fully assessed as part and parcel of this development.</p> <p><b>Having made our recommendations, BirdLife Malta reserves its right to make further comments, recommendations, and observations during the EIA process of such a development, while reserving its position on the actual development once the impacts of the development are fully investigated and assessed diligently.</b></p>
9	<p>Environmental Health Directorate</p> <p>(LATE SUBMISSION - email dated 16/04/2021)</p>	<p>With reference to your e-mail dated 09 March 2021 regarding subject indicated in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development:</p> <p>No works on the construction of the proposed jetty and boat piers are to be carried out during the bathing season; hence works are to be undertaken from the fourth week of October till the fourth week of April.</p> <ol style="list-style-type: none"> <li>1. Air pollution impacts assessment: <ul style="list-style-type: none"> <li>• For excavation and construction</li> <li>• Transports, storage and handling of construction materials</li> <li>• Operational traffic</li> <li>• Emissions from heavy vehicles</li> <li>• And their effects on the surrounding area included marine environment.</li> </ul> <p>Necessary monitoring and mitigating measures must be clearly stated.</p> </li> <li>2. Noise and vibration impacts including construction activities, operational traffic and from other operational activities. Required monitoring and mitigating measures must be clearly stated</li> </ol>

3. Traffic Impact Assessment and mitigation measures.
4. Light pollution impact mitigation measures.
5. A Waste Management Plan shall be implanted which should include the impacts from waste generated during the construction (demolishing, excavated and construction material) and operation phase. Hence the importance of a detailed Construction and Waste Management Plan, which should be enforced by the site project manager. Details of monitoring and feedback mechanisms must be clearly stated and adhered to.
6. Adverse impacts caused by heavy machinery used both on land and sea for this project. Necessary monitoring and mitigation measures are to be clearly stated and adhered to. Included the method used for the refueling of said machinery.
7. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel and lubricants. Necessary monitoring and mitigation measures are to be clearly stated and adhered to.
8. Clearly identify the material used for the construction of the jetty. Said material should be marine grade and where possible pre-cast concrete block should be used to avoid unnecessary contamination of the sea water from accidental spillage.
9. Where the use of the pre-cast concrete block cannot be used, monitoring plan and mitigation measures to prevent avoid the dispersal of concrete form the use of concrete mixer used both at sea and on land are to be clearly identified.
10. Clearly identify the method, monitoring and any mitigation measures for the proposal that will affect the bathing/sea water.
11. Clearly identify the measures and mitigation measures to be taken in case of rain, heavy winds and storms that may affect the works and might cause undesired spillage at sea and/ or land during the project.
12. Proposed swimming pools and spa are to conform with the requirements of the Swimming Pool Regulations and are to be registred with the Environmental Health Directorate.
13. Any discharge point from swimming pool that will be present on site is to be clearly indicated.
14. Effects on water quality and mitigation measures on the use of Reverse Osmosis and the sewage treatment plant. Adequate measures are to be taken to ensure that the discharge brine and overflows from rainwater harvesting tanks are to be strictly managed and properly channelled.
15. All necessary precautions and preventive measures are to be taken during the construction works on the jetties/boat piers so as to prevent any adverse impacts which may result in deterioration of the bathing water quality of the official bathing sites: San Niklaw D22 and Santa Marija Bay D23) during the official bathing season which is between the third week of May and the third week of October.

16. The overall cumulative impacts of the development on the general public especially the negative effects that might have on bathers and coastal users although such works are not to be carried out during the official bathing season as indicated already above,
17. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence.
18. Pest control management on site and the surrounding during the excavation and construction phase.
19. Applicant is requested to consult with the Environmental Health Directorate regarding the proposed catering facilities, pools and spa in view of specific regulations under the provisions of the Food Safety Act and the Public Health Act.
20. Rain water collected in proposed reservoir should not be used for human consumption and or personal use. All water used from human consumption and personal use is to be adequate and potable and from an approved water supplier source and registered with the Health Authority.
21. Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authority when requested.

The EIA should also include a detailed description of the measures envisaged to prevent, minimise and where possible offset any significant temporary or permanent adverse health effects and nuisances on the Area of Influence and the ireneral public. This should include details regarding monitoring programmes that may be proposed. The EIA should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.