

# Environmental Impact Assessment

## Screening according to Schedule III of S.L. 549.46

<b>ERA Reference no.:</b>	EA 00011/22
<b>PA Reference no.:</b>	PA 03673/21
<b>Project Title:</b>	Installation of greenhouses for snail farming including levelling of site, demolition and reinstatement of rubble walls, relocation of existing trees within same site and construction of agricultural store with PV panels, meter room and water tanks.
<b>Location:</b>	Site at (field), Triq tal-Balal, Naxxar
<b>Screening date:</b>	April 2022

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## I. BACKGROUND

### 1. Outline of Proposal

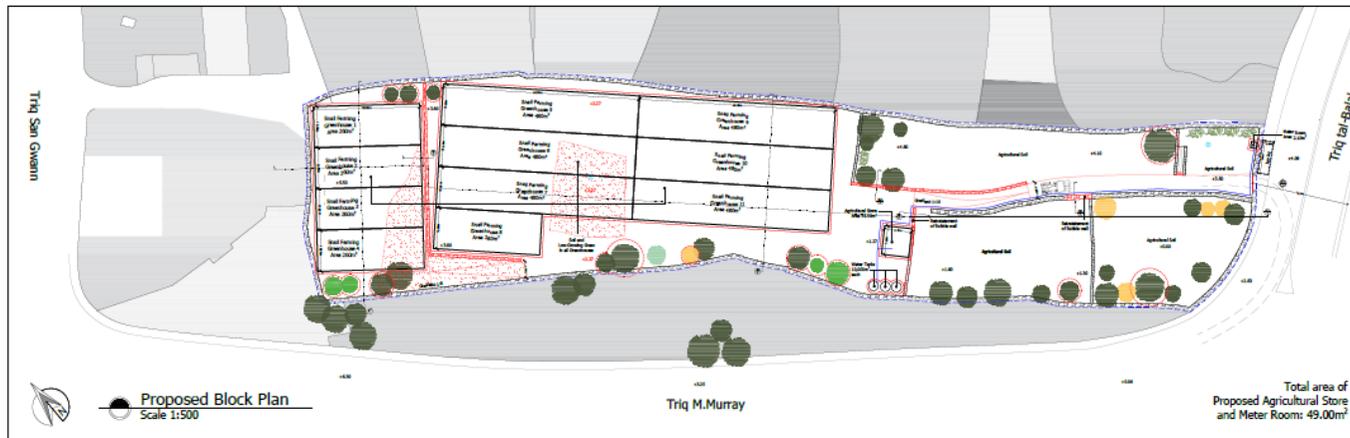
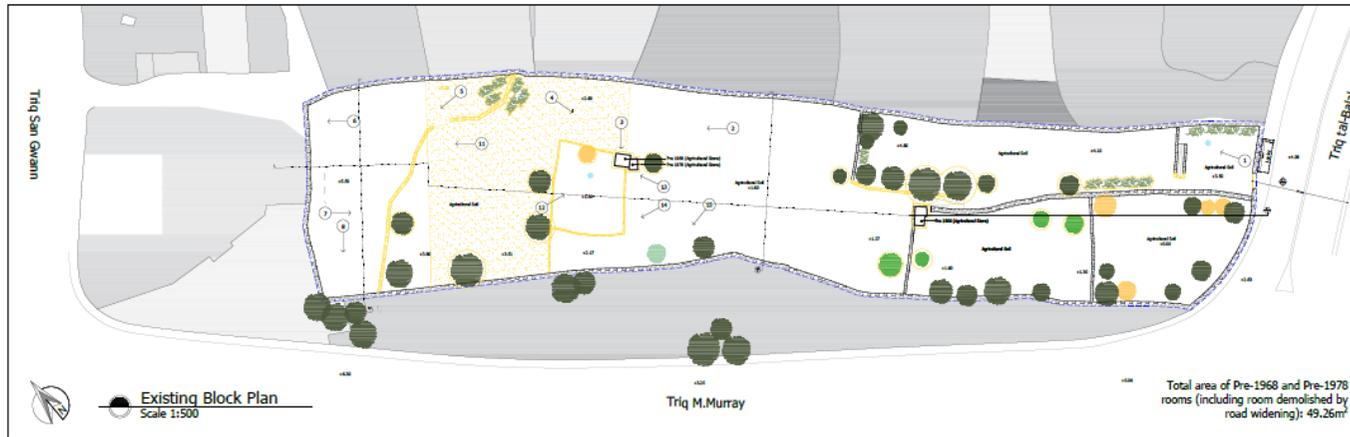
- 1.1 The proposal is for a snail farm (**Figures 1 & 2**) and includes the erection of eleven greenhouses clustered into two groups. These will occupy an area of 4,180 m<sup>2</sup> and will be 3.6 m high. An agricultural store, water tanks and meter room are also being proposed in relation to the operation of the snail farm. Refer to the block plan in **Figure 3**.
- 1.2 Since the site has different levels, soil in the northern part of the site will be levelled whilst the central part will be infilled to accommodate the greenhouse structures. Ramps will be constructed to allow access within the site.
- 1.3 The southern and south-eastern fields will not be developed. No excavation is being proposed. Soil will be temporarily removed to lay prefabricated concrete blocks or to cast the concrete footings that will serve as the foundations of the greenhouse structures. The soil will be reinstated once the foundation blocks are placed on site.
- 1.4 Over 160 m of rubble walls will be lost. The remaining walls will be repaired and reinstated. Ten almond trees, four olive trees and one citrus tree will be relocated within the site as a result of the proposal. Four clumps of prickly pears will be removed from the site.
- 1.5 Low-lying grass will be allowed to grow at the base of the pans in each greenhouse, to support humid conditions for the snails. This grass will be trimmed regularly, whilst the edges of the pan will have a low voltage electric fence to ensure that there are no escapes.
- 1.6 The site under assessment covers almost 11,000 m<sup>2</sup>. According to the PDS, it is estimated that the farm will produce between 30 and 37 tons of snails annually.



**Figure 1:** Aerial ortho-photo showing the location of the proposal in blue (Source: PA Geoserver, 2018).



**Figure 2:** Close-up aerial ortho-photo showing the site extents of the proposal (Source: PA Geoserver, 2018).



Quantity/Remarks / Name of Tree	No. of Existing Trees to be Relocated	No. of Proposed Trees	No. of Deleted Trees	No. of Relocated Trees	Total
Pinus Datta / Akasid	17	0	0	17	17
Oliv Europaea / Olive	0	0	0	4	4
Olivus / Olive Tree	4	0	0	1	5
Alnus Datta / Fig	1	0	0	0	1
Quercus Ilex / Holly Tree	2	0	4	0	0

project file:  
 installation of greenhouses for soil farming including leveling of site, demolition and reinstatement of rubble walls, relocation of existing trees within same site and construction of agricultural store with PV panels, meter room and water tank.

architect of record:  
 DIFRANCO ARCHITECTS  
 25, St. Joseph High Road, Triq. M. Murray, Marsa MRS 1441, Malta

notes:  
 ○ Trees to be relocated to  
 ○ Trees to be relocated from  
 ● Well

+0.00 Proposed Level (To Demolish)  
 +0.00 Proposed Level (To Construct)  
 +0.00 Existing Level

Proposed (To Demolish)  
 Proposed (To Construct)

Total Footprint 10,900m<sup>2</sup>  
 Routing for Services

drawing title:  
 Existing & Proposed Block Plan

drawing detail:  
 drawing No: P03(01) PA 01 scale: 1:500 (A1)  
 revision: 1 date: 04/03/22  
 drawn: DV checked: R

45c

**Figure 3:**  
 (Source:  
*Existing and Proposed Block Plan at PA E-Apps PA/03673/21/45c).*



**Figure 4:** Photo of existing rural structures including rubble walls and agricultural store on site  
(Source: *Photo no. 12 from Photo Survey at PA E-Apps PA/03673/21/5b*).



**Figure 5:** Photo of existing rural structures including rubble walls and agricultural store on site  
(Source: *Photo no. 10 from Photo Survey at PA E-Apps PA/03673/21/5b*).

## 2. Site context

- 2.1 The location of the site is at the south-eastern corner of In-Naxxar between Triq Tal-Balal and Triq Margaret A. Murray, abutting L-Iklin to the south and Għargħur to the east. The access to the site is through Triq Tal-Balal. Refer to **Figures 1 and 2**.
- 2.2 The site lies in former quarries that have long been converted into agricultural fields, some of which is fallow, whereas some is currently in use. The site also includes a number of derelict rural structures (**Figures 3-5**) as well as a number of trees, namely prickly pears, 27 almond trees, five citrus trees, four olive trees and a fig tree (PA E-Apps PA/03673/21/45c; **Figure 3**).
- 2.3 The predominant land uses in the area are agricultural, largely to the east (some consist of reclaimed former quarries); and residential, largely to the west. The Naxxar area includes a few retail outlets too.
- 2.4 The Central Malta Local Plan, 2006 (CMLP), through Policy CG24, designates the site as part of an Agricultural Area (awaiting classification of agricultural value). It also falls within a Strategic Open Gap (Policy CG25). The latter promotes uses and activities such as habitat conservation/recreation, rural afforestation, arable agricultural land uses and public informal recreation.
- 2.5 The proposed development is located over the Malta Mean Sea Level Aquifer and lies just outside the 300 m buffer of the Groundwater Safeguard Zone.

## 3. Site history

- 3.1 This site has not been previously subject to any Planning Applications.

## 4. Screening Criteria

### 4.1 EIA Screening

*(Citations refer to S.L. 549.46, except where otherwise specified):*

The proposed development falls within the scope Schedule I Category II Section 8.1.2.9 [ii] *(Any establishment rearing: [ii] other animals [e.g. snails, insects or frogs] that can create an ecological imbalance or other impacts if they escape into the wild)* of the EIA Regulations (S.L. 549.46).

## 5. Documents used for screening

- i. Project Description Statement (PDS) which was referred to ERA on 07<sup>th</sup> March 2022;
- ii. ERA screening reply dated 25<sup>th</sup> June 2021 on the PA E-Apps system at doc 31a;
- iii. Plans available on PA E-apps at Docs 45; and
- iv. Central Malta Local Plan, 2006 (CMLP).

## II. ASSESSMENT OF PROPOSAL

### 6. Assessment of Impacts and Ancillary Considerations

*(Screening in terms of Schedule III of the EIA Regulations, S.L. 549.46)*

- 6.1 The construction of the proposed eleven greenhouses will lead to the loss of over 160 m of rubble walls as well as the pre-1968 and pre-1978 agricultural stores present on site (refer to **Figures 3-5**). Such structures are protected under Rubble Walls and Rural Structures (Conservation and Management) Regulations (S.L. 552.01) for their environmental, cultural and biodiversity value. Although no significant impacts on land use are envisaged given the non-permanent nature of the proposed structures, the design and layout of the proposed interventions on site should be revised such that the rubble walls are retained on site. Consultation with the Superintendence of Cultural Heritage (SCH) is recommended in relation to the existing agricultural stores.
- 6.2 The present clumps of trees and vegetation within and around the rubble walls, which act as ecological corridors and ecological 'stepping stones' should be retained and safeguarded.
- 6.3 The proposed area is surrounded by agricultural fields to the east. Given the nature of the project and the nature of the site surroundings, there is a potentially significant risk of adverse impacts on the surroundings in the event of any accidental escapes into the wild, as the snails' foraging would be expected to be deleterious to natural and cultivated vegetation. The magnitude and probability of such impact on the environment is unclear and thus an environmental risk assessment is required.
- 6.4 Although the levelling of the area, together with the height of the greenhouses will likely make the proposed greenhouses visible from the roads, such impact is envisaged to be minor in terms of visual amenity and landscape character and on noting the location of the proposal.
- 6.5 The required site preparation i.e. minor levelling, setup of bins and the necessary equipment; will generate dust, noise and vibration emissions during the construction phases. Although, such impacts are likely to be short-term and can be minimised at

source in line with the Environmental Management Construction Site Regulations (S.L. 552.09), effort in retaining the existing site levels should be made. In this regard, the revised plans are to also address this consideration.

- 6.6 During operation, waste will be generated from excess feed and the snails' excreta. The PDS states that this waste will be collected in appropriate bins and will either be composted on site or disposed of in a licensed facility. In this regard, no significant impacts are envisaged in terms of waste generation.

### Screening Outcome

In view of the above, the proposed development is not envisaged to have any significant environmental impacts. In this regard, the submission of an EIA is not required subject to the requirements below.

## **7. Required further submissions (to be addressed as part of this assessment)**

- Revised plans illustrating that the retention on site of the rubble walls and trees;
- An environmental risk assessment study is to be undertaken to address the likelihood and implications of any accidental escapes of snails into the surrounding environment;
- Official correspondence from the Agricultural Advisory Committee (AAC) which states the capacity of all animals approved to be kept on site;
- Official clearance from the AAC stating the volumes required to cater for the solid and liquid manure produced by the animals kept on site and whether the waste management facilities provided are sufficient to cater for the numbers of all animals to be kept on site.

## **III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD**

### ***Environmental Impact Assessment, S.L. 549.46***

The above EIA screening has concluded that the environmental impacts of the proposal are unlikely to be significant and therefore no further assessment in terms of Regulation 15 of the EIA Regulations (S.L. 549.46) is required. ERA does not object to the proposal from an environmental point of view, as long as the requirements requested in Section 7 above are addressed to ERA's satisfaction, and as long as various preventive and/or mitigation measures are duly incorporated into the mainstream development consent mechanism. ERA reserves the right to issue conditions once the required further submissions outlined in Section 7 above have been addressed.

**Screening Disclaimer**

*The above screening results, the ensuing conclusions and recommendations are without prejudice to any required changes or updates should the development proposal be eventually modified or should the information/assumptions provided turn out to be incorrect. Any deviations of the proposal from this submission would need to be re-assessed and the merits of this screening would need to be re-opened.*