

## Environmental Impact Assessment

Screening according to Schedule III of S.L. 549.46

### Appropriate Assessment

Screening according to S.L. 549.44

**ERA Reference no.:** EA/00026/20  
**PA Reference no.:** Tracking Number: 283200  
**Project Title:** Fish Rearing Open Sea Facility.  
**Location:** Site at sea, 35°44'14.47°N, 14°44'49.87°E, Offshore Marsaxlokk  
**Screening date:** September 2025

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## I. BACKGROUND

### 1. Outline of Proposal

The proposal entails the establishment of an offshore large-scale fish farm located approximately 22km off the South-East coastline of Malta. The farm will consist of square platforms measuring 100 by 100m, each connected to four submerged cages measuring 50 by 50m each (refer to Figures 1 and 2). Initially, one platform will be set up as a pilot for 12 months, then three additional platforms will be installed in stages. The platform will be assembled onshore and then towed to the site. The cages will be assembled and installed onsite using boom cranes.

The total site footprint is approximately 90,000m<sup>2</sup>, including four anchoring points at each corner of the platform. Two additional emergency anchors will be stored on the platform corners along four towing bollards and two lifeboats. The platform will be raised approximately 20 metres with two gantry cranes being the highest part of the structure at 36 meters. An air-conditioned site office including toilet and photovoltaic panels will be located on the platform, including a helipad on deck.

The cages may be split into smaller sub-cages, depending on the species reared, which as stated in the PDS, 'all indigenous species that are commercially sought and not placed on any endangered list may be considered, such as bluefin tuna, sea bass and sea bream'. This will depend on seasonality and consumer demand, however the farm will cater between 5,000 and 8,000 tonnes of cultivated organisms per year. Depending on the demand, the cages may also be used for other uses other than the rearing of fish, such as for scientific research purposes or the cultivation of cosmetic and pharmaceutical ingredients.

An integrated, multi-trophic approach will be taken where the upper levels will be dedicated to fish production, while the lower levels will host bottom feeders such as crustaceans. Such systems reduce the amount of discharges from the site. Fries will be bought readily hatched from a foreign supplier and raised in cages until maturity. Once the fish reach maturity, they will be harvested on the platforms and transferred to the clients directly.

The feed will be stored within the legs of the structure and dispensed automatically, dispensing feed according to the weight, life stage and condition of the reared fish, utilising infra-red sensors to collect data.

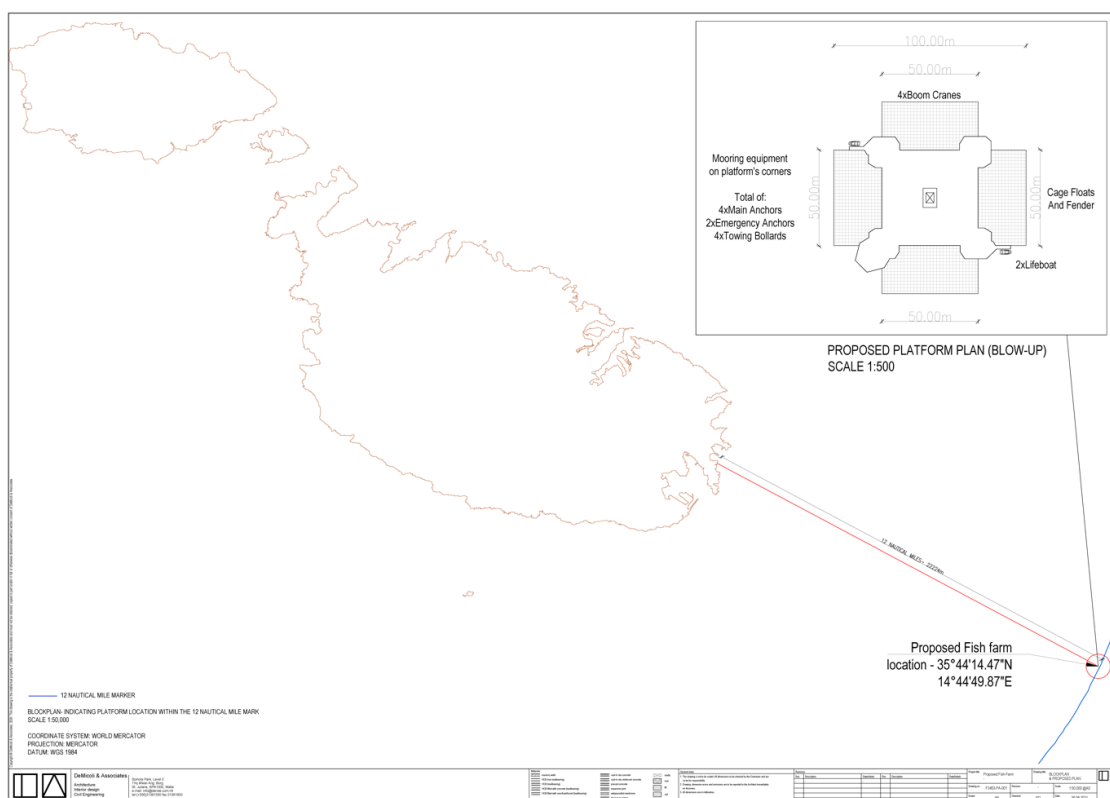


Figure 1: Proposed site and plan of platform (Source: PDS)

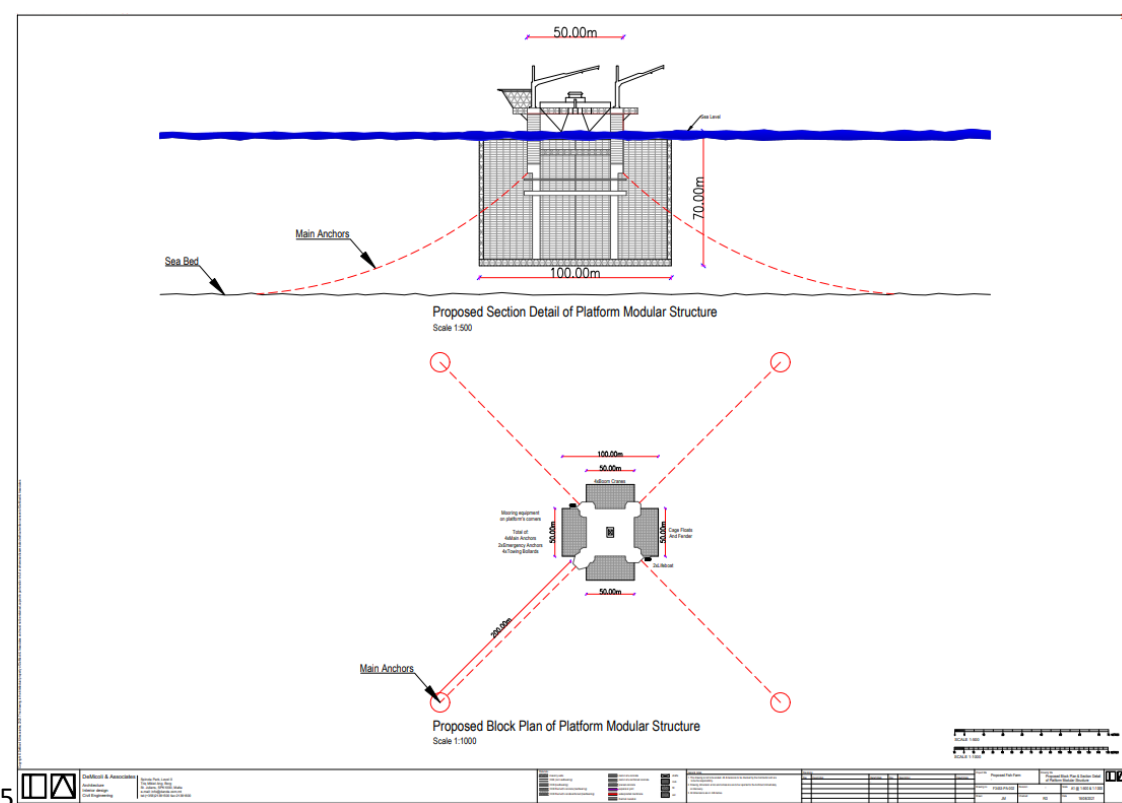


Figure 2: block plan and section details of platform modular structure (Source: PDS)

## 2. Site context

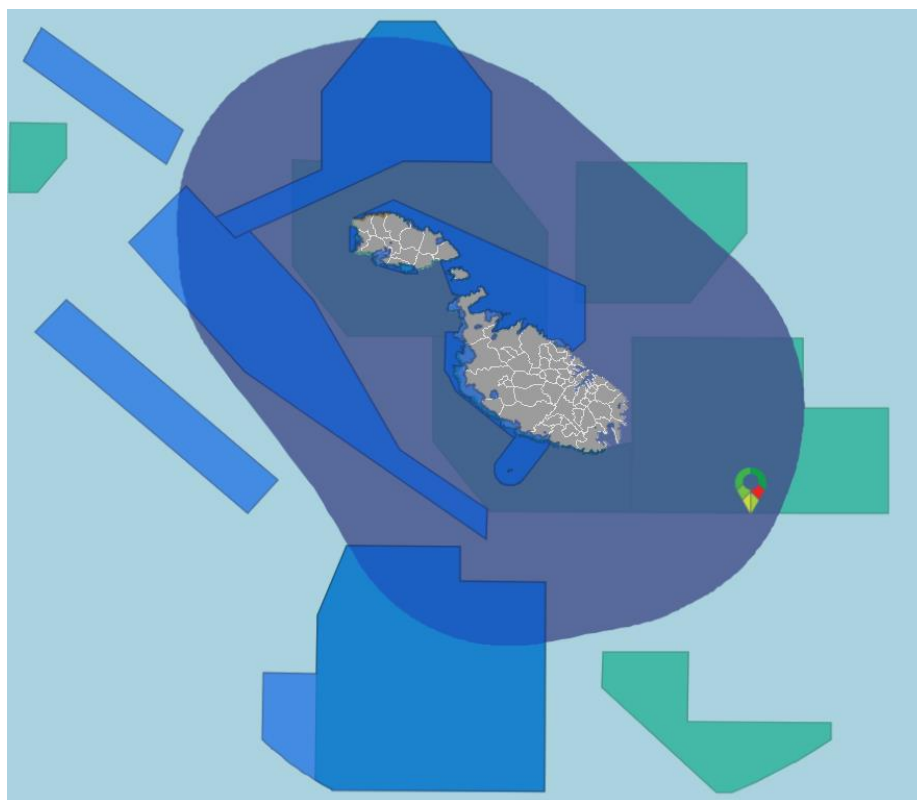
The proposed site is located approximately 22km off the South-East coastline of Malta, bordering the Maltese territorial waters (refer to Figure 3), at 100 to 140m deep.

The area is located within a zone where an average of 2 hours of vessel activity is recorded per month, consisting mainly of cargo vessels. Tanker and fishing vessels were recorded to contribute an average of 0.5 hours of vessel activity per month.

North of the site, at a similar distance from the coast are located Bunkering Area 3 and a waiting area.

The proposed site is located over pure carbonate sedimentary rock while the seabed habitat type is classified as 'Mediterranean Bioceonosis of Coastal Detritic Bottoms'. Both are characterised by a mixture of different sediment types consisting of mud, sand, gravel, cobbles, pebbles and shells.

The site is also located within the marine Special Protection Area (SPA) MT0000108 known as Żona fil-Baħar fil-Lvant, designated under Government Notice No. 1311 of 2016, in accordance with the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44) (refer to Figure 3).



*Figure 3: Location of the proposed development vis a vis location of Natura 2000 sites and territorial waters boundary (Source: MEPS – ERA portal)*

## 3. Case history

The site was not previously subject to planning applications / enforcement notices / DNOs.

## 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 of the Environmental Impact Assessment Regulations (S.L. 549.46), notably in terms of Schedule I, Category II, Section 8.2.2.1 (*Aquaculture establishments for any type of aquatic organism (including fish farms, hatcheries, tuna pens, shellfish or crustacean farms, seaweed production units, or similar establishments), as well as extensions or modifications to an existing establishment, or any ancillary facilities, not covered by Category I*). In this regard, the proposal was also screened in terms of the EIA Regulations.

### 4.2 Appropriate Assessment Screening

(citations refer to S.L. 549.44, except where otherwise specified):

The proposal lies within a Marine SPA designated under Government Notice No. 1311 of 2016, in accordance with the Flora, Fauna and Natural Habitats Protection Regulations. In this regard, the proposal has been screened in terms of Regulation 19 of the aforementioned Regulations.

## 5. Documents used for screening

- a. Project Description Statement (PDS), referred to ERA on 30<sup>th</sup> September 2024;
- b. Revised Project Description Statement (PDS), referred to ERA on 20<sup>th</sup> January 2025;
- c. Revised Project Description Statement (PDS), referred to ERA on 5<sup>th</sup> August 2025.

## II. ASSESSMENT OF PROPOSAL

### 6. Screening in terms of the EIA Regulations

#### Sea uses

- 6.1 No known telecommunications/ power cables, bunkering areas or major marine infrastructure are located within the proposed site. The site also falls within the Fisheries Management Zone, however does not coincide with any of the designated trawler zones. Vessel activity in the area is limited to 2 hours per month. In this regard, no significant impacts are envisaged due to the site's remote location.

#### Services and installation

- 6.2 Due to its location, the project will be self-sufficient, with electricity derived primarily from solar panels and batteries that will be supplemented with on-site generators. Water supply for consumption to on-site works will be provided through a reverse osmosis plant, with effluent discharged back into the sea. Rain water will flow naturally from the platform into the sea.
- 6.3 With regards to sewage generated by workers, blackwater from on-board toilets will be stored temporary within the platform, while sewage effluent will be processed on board and returned to sea.
- 6.4 In view of the above, no significant impacts are envisaged.

### Light and noise

- 6.5 While the PDS indicates that the platforms will be manned on a 24-hour basis, with limited activity anticipated after sunset, and that lighting will be restricted to the minimum required under the Collision Regulations (COLREGS), the potential impacts of night-time presence and illumination on the avian species is unclear at this stage.
- 6.6 Noise related impacts during feeding, boat traffic and helicopters on the avian species are also unclear.
- 6.7 In this regard, light and noise related impacts on avian species specifically during night-time are to be assessed further.

### Waste management

- 6.8 With regards to organic loading and nutrient enrichment, in view that the type of fish to be reared is unknown and wide-ranging, the potential impacts associated with fish feed (including thaw water from baitfish, oil slicks, etc) and excreta are unclear.
- 6.9 Although the project adopts an integrated, multi-trophic aquaculture, uneaten feed can still passthrough the net and settle on the seabed, resulting in an increase in the local scavenging community and an accumulation of organic matter and nitrogen in the sediment beneath the cages. The scale and ecological significance of such effects are uncertain at this stage.
- 6.10 In view of the above, further assessment, of the potential operational impacts, based on a precautionary “worst case” scenario, is considered necessary. The assessment should identify and appraise appropriate mitigation measures to ensure that accidental releases, discharges, or spillages to the surrounding environment are avoided or effectively controlled.
- 6.11 During the operational phase, the proposed development is likely to generate general waste streams, including packaging material associated with the importation of baitfish, as well as potential for gear loss, resulting in marine litter. Harvesting and processing operations are likely to generate mortalities, blood, wastewater from onboard processing of fish and offal. The potential impacts resulting from these waste outputs are to be assessed together with how these can be mitigated. In addition, maintenance activities may give rise to the release of antifoulants and therapeutants. Given that such impacts are unclear, further assessment is required.

### Marine benthos, water and sediment quality

- 6.12 The potential effects arising from the installation of mooring blocks, including seabed habitat burial, sand scouring, and sediment re-suspension, cannot be determined at this stage.
- 6.13 The significance of potential impacts on benthic assemblages resulting from shading effects associated with the proposed platforms and cages is uncertain.
- 6.14 The extent to which the proposed development may alter hydrodynamic conditions, including potential increases in water movement, is also unclear at this stage.
- 6.15 In light of the above uncertainties, a detailed survey of the current marine ecological conditions and assessment of the highlighted potential impacts is required.

## 7. Screening in terms of the Flora, Fauna and Natural Habitats Protection Regulations, S.L.549.44

- 7.1 The proposed development is located within the marine Special Protection Area within the Natura 2000 framework due to importance for *Calonectris diomedea* and *Hydrobates pelagicus* breeding season.
- 7.2 Light and noise emitted from the proposed development may disturb, attract or disorient seabird species. In this regard, further site-specific assessment is required to determine the extent and significance of such impacts.

## III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

### EIA Screening (in terms of the EIA Regulations, S.L.549.46):

The above screening concludes that the proposed development is likely to have a significant impact on the environment and therefore the submission of an EIA is required. This is to address impacts in terms of the following environmental parameters: light, noise, waste management, marine ecology, marine water and sediment quality.

### AA Screening (in terms of the Flora, Fauna and Natural Habitats Regulations, S.L.549.44):

The above screening concludes that impacts related to light and noise on *Calonectris diomedea* and *Hydrobates pelagicus* are uncertain. In this instance, the proposed development requires an Appropriate Assessment (AA).

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### 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.*