[EIA Scoping] - EA 14/13 - Delimara Gas and Power - CCGT (Combined Cycle Gas Turbine Power Plant) and LNG (Liquified Natural Gas) Receiving, Storage and Regasification Facilities, at, Delimara, Marsaxlokk

Din l-Art Helwa Response to MEPA – 21 June 2013

1. Assessment of Alternatives - Din l-Art Helwa is in favour of operating the Delimara power plant using gas instead of Heavy Fuel Oil (HFO) due to the better environmental performance of gas. It is however understood that the importation of gas to Delimara would be possible through one of two main alternatives: firstly through the importation of natural gas through a pipeline, or secondly by constructing a combination of onshore/floating storage and regasification facilities to enable the importation of liquefied natural gas (LNG) by shipment. These two main alternatives should be assessed as part of this application. Directive 2011/92/EU states that an EIA should include, "an outline of the main alternatives studied by the developer and an indication of the main reasons for his choice, taking into account the environmental effects". This is important to ascertain that all options have been considered thoroughly and that the best long-term choices are made, with all the relevant environmental information made available to the public. Din l-Art Helwa also would like to have confirmation that it will still be possible to obtain EU funds for a gas pipeline if the onshore/floating LNG facilities are constructed.

2. Revision of National Energy Policy and Strategic Environmental Assessment - Malta's National Energy Policy of 2012 favoured a gas pipeline option (subject to EU funding) and was subject to a Strategic Environmental Assessment (SEA). Din l-Art Helwa notes that if the energy strategy is now being revised to introduce onshore/floating facilities for the storage and regasification of LNG, together with a significant change in the "default pecking order" (p. 74) of energy supply with reduced energy provision through the interconnector, then the National Energy Policy should first be updated and screened for an SEA. The proposed project should then be assessed through an EIA once the SEA stage has been completed. Regulation 3 (1) of the Strategic Environmental Assessment Regulations, LN 497 of 2010, includes "modifications" to plans and programmes that fall under the SEA Regulations. Furthermore, Regulation 4(3) of LN 497 of 2010 specifies that only "minor" modifications may be excluded.

3. Reduced energy provision through interconnector (air emissions) - Din l-Art Helwa notes that the proposal to construct onshore/floating storage and regasification facilities for LNG may imply a potential reduction of energy provision through the interconnector to Sicily. If more energy is generated onshore instead of being imported to Malta through the interconnector, this may imply that overall higher emissions from the energy sector may be generated in Malta than envisaged in the current National Energy Policy. This implication should be assessed in the revision of the National Energy Policy, as well as in terms of the Convention for Long-Range Transboundary

Pollution (CLRTAP) and national emission ceilings, with special focus on Malta's achievement of targets for nitrogen oxides. The environmental benefits or disadvantages of the proposed project with respect to air emission targets should be specified and compared to the current National Energy Policy.

4. Reduced energy provision through interconnector (cooling water discharge) - If more energy is generated onshore instead of being imported through the interconnector, this may require relatively larger amounts of cooling water with discharge into l-Hofra z-Zghira. This should be assessed when comparing the environmental impact of the two main alternatives for the importation of gas to Delimara.

5. Environmental Impacts on Land and Marine Areas - It is understood that the gas pipeline infrastructure may have less intense environmental impacts on land and marine areas around the Delimara plant, when compared to the construction of onshore/floating LNG facilities. The land and marine impacts of the two main alternatives should be assessed in detail, including the construction of a new jetty, dredging works, land reclamation, and the potential removal or relocation of the Has-Saptan refuelling dolphin.

6. Air Emissions - The PDS (p.22) highlights that the new CCGT will have significantly lower emissions that the DPS 1 block for the same amount of electricity produced. According to the current National Energy Policy (p. 74), the DPS 1 block would however only generate a very limited amount of national energy requirements once the interconnector comes on line post-2014. The EIS should include a detailed comparison between a) estimated air emissions generated by the existing Delimara facilities together with the interconnector in line with the current National Energy Policy including conversion to gas, and b) estimated air emissions generated by a combination of the proposed project together with the interconnector and existing Delimara facilities converted to gas. The EIS should also include a comparison of: a) actual emissions at 'Delimara 3' operated with HFO, and b) estimated emissions at 'Delimara 3' operated with gas, to quantify the environmental benefits.

7. 'Delimara 3' Cost Benefit Analysis – Enemalta's Cost Benefit Analysis (CBA) of 2011 which formed part of the 'Delimara 3' extension application to MEPA, identified the gas pipeline infrastructure as the best approach for the importation of gas (Annex 1 of CBA) to operate the Delimara plant, including for reasons related to environmental risk and land utilisation. The CBA also included an estimation of emission costs, and this exercise should now be repeated as part of the overall environmental assessment of this application.

8. Social Impact Assessment - The siting of floating LNG facilities in Marsaxlokk bay with a floating platform, a new jetty and the regular movement of large re-supply tankers, may have an impact on the use and enjoyment of the bay by local residents and commercial outlets, for example, restaurants, tourism outlets, recreational activities such as bathing, diving and fishing, bathing water quality, and the movement and berthing of smaller

vessels in the harbour. The bay has a variety of users and is not an exclusively industrial zone. To clearly identify and address the impact of the floating LNG facilities on residents and commercial/tourism activity in the area, compared to the gas pipeline alternative, a full Social Impact Assessment should be carried out. Visual photomontages of all options and other information about the project and the main alternatives should be made available for comment during surveys.

9. Visual Amenity - The siting of onshore/floating LNG facilities in Marsaxlokk bay will impact visual amenity in the area. A study of visual impact should form part of the EIS, including full photomontages of all options of the project in the operational phase with all proposed facilities in place, including the storage tank platform, regasification equipment, a berthed re-supply tanker, the new stacks and the removal of the existing high chimney (as proposed).

10. Renewable Energy - Table 2.2 of the PDS does not include any estimations of renewable energy generation during the lifetime of the proposed project. Estimates for renewable energy should be included in the assessment.

11. Justification for project - In the section 'Justification for Project', the PDS does not give details of specific environmental benefits to be achieved by the proposed project compared to the current National Energy Policy – these should be specified more clearly.

Din l-Art Helwa would like to receive a copy of the Terms of Reference for this EIS once they have been drafted.