



**Din I-Art Helwa**

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**Dr Kevin Gatt**  
**Chairman - SEA Focal Point**  
**OPM, Castille Place, Valletta**

27 June 2013

Dear Dr Gatt,

**Revision of National Energy Policy – Strategic Environmental Assessment**

Din I-Art Helwa would like to raise a concern in relation to the above.

Malta's National Energy Policy of 2012 was subject to a Strategic Environmental Assessment (SEA). A significant modification is now being introduced to the energy strategy with the proposed construction of a CCGT (Combined Cycle Gas Turbine Power Plant) and LNG (Liquified Natural Gas) Receiving, Storage and Regasification Facilities at Delimara.

This is a significant change in the "default pecking order" of energy supply as outlined in the National Energy Policy (p. 74), with a reduction in energy provision through the interconnector and the existing Delimara power plant.

This is a significant modification to the National Energy Policy, and the Policy should therefore first be updated, with adequate opportunity for public participation, and screened for an SEA in relation to this modification.

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.

This modification is relevant as if more energy is generated onshore instead of being imported to Malta through the interconnector, this may imply that in the long term overall higher emissions from the energy sector may be generated in Malta than envisaged in the current National Energy Policy – which should also be considered in relation to EU emission targets. If more energy is generated onshore, this may also require larger amounts of

cooling water with marine discharge and consequent further degradation of the marine ecosystem. Furthermore, the alternative gas pipeline infrastructure envisaged in the current National Energy Policy may have less intense environmental impacts on land and marine areas around the Delimara plant, when compared to the construction of the proposed LNG infrastructure.

We look forward to your reply.

Yours sincerely,



George Camilleri

Secretary General – Din I-Art Helwa

**cc. Dr Mario Rodgers, Permanent Secretary, Ministry for Energy and the Conservation of Water**