



**Din I-Art Helwa**

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Dear Mr Koller,

**National Energy Policy – Strategic Environmental Assessment**

With reference to the above subject, Din I-Art Helwa kindly reminds you that we look forward to receiving your reply to our letter of 22<sup>nd</sup> November 2013. We would like to bring to your attention that we have still not received a reply from the government.

At this point, plans are well advanced to implement the new gas-fired power station in 2015. Din I-Art Helwa remains concerned, however, that the bypassing of important procedural steps with respect to the Energy Policy may set a precedent as an approach towards other policies in future. If policies are drawn up only to be bypassed instead of updated when changes are introduced, then the whole policy-making exercise and the related assessments and consultation are rendered quite pointless. The natural gas infrastructure currently being promoted is not included in the National Energy Policy of 2012, which presents a different “pecking order” for electricity generation.

Din I-Art Helwa is in favour of a switch to gas. Our point is that when introducing projects and taking decisions with major environmental impact it is important to follow established procedures, which are put in place specifically to ensure objective and transparent decision-making with adequate public participation.

Your email of 25<sup>th</sup> November 2013 noted that you were informed that, “by promoting the new gas fired power station and its associated developments the Maltese government was embarking on the recommendations of the SEA which had been carried out for the National Energy Policy (NEP) prior to its approval in December 2012”.

Din I-Art Helwa would like to point out that the SEA carried out in the formulation of the Energy Policy of 2012 maintained that the SEA could only provide an “uncertain” assessment with reference to the lack of targets and details on the switch to gas in the draft Energy Policy of 2009.

The conclusion of the SEA (2012) states:

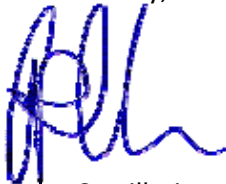
*“7.121. The use of natural gas for the generation of electricity will result in a reduction in the emissions because this fuel has lower emission factors than the fuels currently used for electricity generation. All types of technologies considered require either the building of infrastructure or some sort of intervention. The LNG Terminal has the largest land based requirements whereas impacts from the floating terminal and the pipeline are mainly marine based. **The information available at this stage is not sufficient to point to a preferred option, even from an environmental point of view. More detailed studies are required. At Government level, the type of infrastructure has not yet been identified.** Once a decision is taken, detailed assessments including EIA, risk assessment etc would have to be carried out to identify and address any site specific issues” (p. 137)*

As can be seen above, the SEA calls for more detailed studies to assess the main options for a switch to gas. It is only once these studies have been finalised and a decision is taken, that “an EIA, risk assessment etc would have to be carried out to identify and address any site-specific issues.”

Yet the required studies and environmental assessment to identify the preferred option do not appear to have been carried out. The recommendations of the SEA have therefore not been followed. As these studies have not been carried out, the Energy Policy has not been formally updated and therefore no consultation on the revised policy and related SEA screening has taken place.

Important procedural steps such as the revision of the National Energy Policy of 2012 have been bypassed, and as a result the public has not been given the opportunity to participate in this decision-making in a structured and objective manner.

Yours sincerely,



George Camilleri

Secretary General – Din I-Art Helwa