



Din I-Art Helwa

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Ion Codescu
DG Environment
ENV. D2 – Enforcement, Cohesion Policy & European Semester, Cluster 2
B-1049 Brussels/Belgium

19th January 2014

Dear Mr Codescu,

National Energy Policy

Thank you very much for your letter of 15th January 2014. Din I-Art Helwa understands that, since the SEA Directive (2001/42/EC) does not specifically require Member States to make or change their plans, the European Commission is not in a position to take any further action on this specific point. No breach of the SEA Directive has been identified because an SEA can only be considered if the plan is formally updated.

We appreciate that the EC has however taken good note of Din I-Art Helwa's concern that, as the National Energy Policy has not been formally updated, no consultation on the revised policy or SEA screening has taken place.

The spirit of the Aarhus Convention is that the public should have opportunities to participate in the drawing up of plans and programmes with environmental impact. The public should be able to express comments and opinions before decisions on plans and programmes are made.

Din I-Art Helwa reiterates its position that the government's decision to not formally update the Energy Policy has deprived the public of participating in a structured, objective discussion on the type of gas infrastructure being introduced. We have received comments from members of the public suggesting different locations and ideas for the choice of gas infrastructure, in particular the gas storage facility which is to replace the pipeline and which is of concern to residents in the area, and on the deleterious impact of much heavier industrial presence on the environmental, cultural and social amenities of the Delimara peninsula as a whole. However as no detailed comparative study on the different choices has been put forward, no structured public discussion has been able to take place.

As already outlined and quoted in our previous letter of 10 January, the SEA conducted on the Energy Policy recommended that detailed studies are carried out on all options for gas infrastructure, before a decision on further options is taken or an EIA is conducted.

As no such studies were conducted, Din l-Art Helwa would like the EC to register that it remains the opinion of this organisation that the government has been lacking in the observance of good governance in its procedures when introducing new options for the energy policy for Malta.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'GC', written in a cursive style.

George Camilleri - Secretary General