

Delimara IPPC IP0002/07/E

DIN L-ART HELWA RESPONSE TO THE ENVIRONMENT AND RESOURCES AUTHORITY 27th November 2016

1. ALTERNATIVES

The permanent presence of such a large LNG storage tanker, together with a regular supply ship of the same size, poses risks to the power station, the Freeport, fishing boats and other vessels, and the safety of people in the vicinity. Before taking any decisions, detailed studies should have been undertaken to consider all alternatives with more safety distance and less traffic movements.

Other suggestions for a new gas-fired power station included an offshore platform, a gas pipeline, or basing the gas storage on land. Detailed studies on the various options were not published. The government has now stated that it will eventually replace the FSU with a gas pipeline, however no studies or details have been presented comparing this option to the scenario now being implemented. The advantages and disadvantages of both FSU and gas pipeline should have been studied and compared in detail BEFORE any decisions were taken.

During the EIS hearing it was claimed that mooring outside the bay is not possible, yet offshore platforms exist which survive harsh weather conditions in the North Sea and elsewhere. More details about this option should have been provided before any decisions on the LNG storage option was decided.

2. UTILISATION RATES AND EMISSIONS

The EIS had not provided an adequate answer to the following query which was made by Din I-Art Helwa in relation to the draft EIS:

"The Project Description Statement states that the Delimara3 extension (when converted to gas) is only expected to have a utilisation rate of 50% once the proposed CCGT plant is operational. What are the expected utilisation rates of the proposed CCGT plant, the Interconnector, and the rest of the Delimara plants, from 2015 to 2020? What will be the "default pecking order" of the various power plants and the Interconnector? This analysis must be included in the EIS."

The EIS coordinator response was as follows:

"The EIS covers an application for a new CCGT and assumes that such CCGT will be utilised to satisfy base load requirements. Other considerations such as making more use of the interconnector and reducing the use of the proposed CCGT may result in less environmental impact, but such a

decision is not only taken on the environmental impact but on a range of other considerations including but not limited to economic issues. Such considerations are being dealt with in the CBA which will form part of the IPPC permit as requested by MEPA.”

The EIS response noted that the Cost Benefit Analysis is being undertaken as part of the IPPC permit, however has not been published.

The EIS coordinator had also stated that “making more use of the interconnector and reducing the use of the proposed CCGT may result in less environmental impact”.

Din I-Art Helwa’s earlier request, submitted in relation to the draft EIS, to outline the proposed utilisation rates of the proposed CCGT plant, the interconnector and the rest of the Delimara plants, should have been answered in the EIS which should have addressed all environmental considerations and scenarios. No satisfactory answer was provided to this question at that stage, which has environmental implications.

During the IPPC consultation meeting on 28th October 2016, Din I-Art Helwa repeated this request but was only later provided with the chart below, which is unsatisfactory as it does not in fact outline the proposed utilisation rates of the various power sources, which will affect the total emissions:

	Actual or Projected Demand (MWh)	Energy Mix	No _x (tonnes)	SO ₂ (tonnes)	Dust (tonnes)	Ammonia (tonnes)
2014	2,227,821	D1, D2, D3, MPS and PVs	2,786.0	4,566.4	405.8	15.7
2015	2,304,061	D1, D2, D3, MPS, Interconnector and PVs	1,541.6	1,999.7	129.6	5.4
2016	2,301,465	D1, D2, D3, Interconnector and PVs	1,029.8	1,434.8	78.8	4.6
2017	2,457,467	D3, D4, Interconnector and PVs	422.0	35.1	18.3	1.8
2018	2,514,881	D3, D4, Interconnector and PVs	423.5	35.3	18.7	1.8

3. DETAILS OF SAFETY ZONES FOR MARINERS, INCLUDING VISUAL IMAGES

It was verbally agreed at the IPPC consultation meeting held in Delimara on 28th October 2016 which Din I-Art Helwa attended, that a report/notice by Transport Malta would be uploaded without delay, to be included with the rest of the IPPC consultation documents on the ERA website, providing **visual images of the three safety zones for mariners** described during the presentation on the nautical risk assessment yesterday, for three scenarios:

- i. during normal operations with FSU moored at jetty
- ii. during periodic deliveries made by LNG carrier
- iii. during times when FSU is on storm moorings

In this document Transport Malta was to also provide **information on the fairways** which will be open to any other vessels using the bay during these three scenarios, as well

as on the coordination of other vessels engaged in delivery operations when the LNG carrier is in the port, as outlined in the presentation.

However on 7th November, Din I-Art Helwa was informed by ERA that:

“On the above request, Transport Malta have provided feedback in that the Notice to Mariners will only be issued prior to the vessel receiving her first LNG parcel. Transport Malta has confirmed once again to Din I-Art Helwa, that they will be ensuring that an unrestricted fairway is established, thus ensuring there are no restrictions relating to fishing vessels and recreational craft.”

Din I-Art Helwa maintains that this information, including visual images of the safety zones for mariners, should be provided to the ERA board as well as the public BEFORE a decision on this permit is taken.

4. SIMILAR LNG FACILITIES

During the public consultation meeting held on 28th October 2016, two similar LNG facilities were mentioned in the presentations. Din I-Art Helwa requested further information from ERA on these two facilities, and was presented with the details below, however neither of these two installations seem directly comparable to the FSU scenario being constructed at Delimara:

- a. *La Spezia: The installation is operated by GNL Italia and consists of an LNG storage and regasification system. The LNG is discharged on shore via LNG carriers but is stored in two storage tanks with a capacity of 50,000m³ each. The load capacity of the LNG carriers varies from 25,000 cubic metres up to 65,000/70,000 cubic metres. Further information is available at the following link: <http://www.gnlitalia.it/en/activities/Infrastructures/>*
- b. *Lithuania: The installation is an LNG terminal in the port of Klaipėda in Lithuania. It is operated by Klaipėdos Nafta. The installation comprises of a liquefied natural gas floating storage and regasification unit (FSRU) (FSRU Independence) with a capacity of 170,000 cubic metres. The LNG is interconnected to the grid as an LNG supply to the market of the Baltic State*