

OPINION PAPER ON

Environmental Impact Statement:

Proposed Development of Verdala Golf Course and Country Club

1. Introduction

The Kummissjoni Ambjent (Commission) which has been set up within the Pastoral Secretariat of the Archdioceses of Malta, has as one of its objectives, the submission of technical opinions on specific environmental issues.

In accordance with procedures approved by the Pastoral Secretariat, the Commission is submitting a technical opinion on the proposed project of development of an 18-hole Golf Course near the Grand Hotel Verdala, Rabat (PA 4179/99). The proposed project includes ancillary development such as a new access, tennis courts, parking and maintenance buildings, development of agricultural land including vineyards, olive groves and orchards.

The Commission has reviewed the Environmental Impact Statement (EIS) on this project which has been produced by Land Use Consultants and Planning Services Consultancy in association with specialist consultants, and which is available online at : <http://www.golf-malta.com/>.

The following is an opinion paper on such an EIS and in particular:

- a) on whether the document provides a scientific and valid evaluation of the environmental and others risks which may be associated with the proposed development;
- b) on whether, on the basis of the findings of such an EIS, the development is justified and acceptable, in view of the requirements of sustainable development.

This paper makes specific comments on the contents of the various sections of the EIS. A general opinion statement follows such comments on the EIS as a whole.

Sustainable development should be one of the major guiding principles that determine our day-to-day decision-making processes. In other words, any development plan needs to identify the various social, economic and environmental concerns that are related to the proposals being tabled and to reach decisions aimed at striking a balance between all these concerns. This responsible way of taking decisions is particularly crucial for a small island state like Malta with a very small surface area and a very high population density. It is against this background that the Commission has reviewed the proposal in question.

2. Project Description, Justification, EIS Methodology and Policy Context

A close analysis of Chapters 1 – 5, and 15 of the EIS has revealed several instances where:

- the information provided cannot inform decision makers properly, because it is often either incorrect or partial,
- research results and documentation that contradict the development proposal are marginalized, and
- certain proposals are not congruent with sustainable development principles and other policies .

2.1 Policy Considerations

Within the context of policy considerations, there are two main policies against which it would be very difficult to justify such a development. These are:

- (a) the Ecclesiastical Entities (Properties) Act, 1992: clearly states (as cited in the EIS, Section 15.46) the condition for land transfer i.e., *“to promote the safeguarding of the environment and the development of agriculture, and to meet the country’s most pressing social requirements, such as social housing and public utilities, as well as for humanitarian, educational and cultural purposes”*.

The condition *“to meet the country’s most pressing social requirements”* is completely ignored by the EIS. Only *“the safeguarding of the environment and the development of agriculture”* are cited as the developer’s responsibilities (see Section 15.52). Also in Section 15.51 (last bullet) the *“most pressing social requirements”* are interpreted as *“most pressing national requirements”*. Considering that the proposal’s main argument for approval is that it promotes tourism (a national priority), this omission may be viewed as a weak justification for the fact that the proposal is in direct conflict with the Ecclesiastical Entities (Properties) Act requirements.

For the purpose of the present document, it is not the intention of the Commission to evaluate the extent to which this agreement between the Church and the Government of Malta, has been abided with in all transfers of properties effected so far. Our aim is to evaluate the present proposal and the extent to which it is in line with such an agreement as it now stands. Furthermore, while the agreement allows for certain interpretations, and provides for procedures to be followed in case of uncertainties, by no stretch of the imagination may the present proposed development be classified as such. The fact that this development is in direct conflict with the stated provisions and the spirit of the

Ecclesiastical Entities (Properties) Act, has been clearly shown by the Press Release issued by the Archdiocese of Malta on the 17th January 2001.

- (b) the Structure Plan: "*the loss of some 50 hectares of land currently used for agriculture*" (see Section 5.19) in a country whose agricultural land is indeed very limited can in no way be considered as encouraging major improvements in agriculture and horticulture (as required by Policy AHF1).

This clear breach of policy is further compounded by the fact that the site "*lies within the Rural Conservation Area and part of it is designated as an area of agricultural value*" (as admitted in Section 5.35). Although the EIS attempts to minimize the development's negative impact on agriculture (in Section 5.72), the proposal still remains a clear breach in policy.

2.2 Research Methodology

Although Chapter 2 proposes a holistic methodology that relates different concerns, the EIS seems to fail in relating results (and their interpretation) from different contexts, together. A case in point was the consultation process with various entities impacted by the development proposal (Section 2.21). There is no detailed record in the EIS of the arguments proposed by these bodies, and only weak attempts to significantly address them (see Section 15.150 – 15.156).

The analysis of the questionnaire given to the farmers tends to be very superficial and inaccurate. The impression given is that the person compiling the report attempts to fit preconceived assumptions to data and downplays any results that contradict them. This situation is rendered more difficult to assess, as most of the data is not provided for the reader of the report to allow an independent interpretation (see Appendix 1 for specific examples of anomalies).

2.3 Need For The Development Scheme

Although Section 1.6 implies that there is research which shows that "*golf related tourism could play a key role in redefining Malta's tourism product, and that additional golf course(s) are required*", no quantitative data is provided to substantiate this claim. The absence of such data seems to have been remedied by the circumstantial evidence that is supplied in Chapter 3 of the EIS:

- Section 3.7 makes the assumption that old people tend to take up golf. Such an assumption needs to be substantiated, considering the fact that it is proposed as the basis of a "*sustained growth in the demand for golf*". Another issue raised by this Section (see also footnote) is: How many of the 128,000 – 152,000 (representing 35.8% - 37.4% of the total tourist population) of 50+ aged tourists

are “high income tourists” *and* golfers? Wouldn’t it have been a better strategy to provide a package just for elderly tourists?

- Assuming that the forecasts provided in Table 3.2 are statistically correct: The Estimated Golf Market represents only 1.8% of the total tourist intake [(21626x100)/1,182,000].
- Also based on data from Table 3.2, North American and Japanese tourists (considered as a possible tourist market in Section 3.13) make up less than 12.2% of tourists visiting Malta [(144,000x100)/1,182,000].
- Even though figures, provided in Table 3.4, showing a 17,047 increase in tourists need to be substantiated, the % of golfers is still 12% [(2044x100)/17047]
- Section 3.16 proposes calculations based on a ‘one day free’ for conference delegates to play golf. However, one could argue (in the absence of any valid statistical data) that experience has shown that the most common ‘bonding’ pursuits offered to conference delegates meeting in Malta are the cultural tours.

Considering the arguments made above, does the “modest number of new tourists” (see Section 3.6) warrant such a scale of development considering our limited land area? Keeping these relatively low numbers in mind and considering the competition offered by other countries that have *already* established themselves as golfing destinations (see 3.4 and 3.8); would it be wise to plan for future tourist development by investing in golfing?

The report makes another attempt to justify the development scheme by making several estimates/predictions regarding the local demand for golfing (Sections 3.18 – 3.20). By basing these estimates on golfing practices experienced in the UK (where land availability permits such pursuits) the report, again, highlights its insensitivity to local culture and lifestyles.

Policy TOU 12 states that preferred sites would be those where associated development can be satisfactorily accommodated, preferably as part of an adjacent built up area and where suitable vehicle access exists and the Verdala site clearly meets such criteria, however it does not meet the criterion with regard to point 1 of TOU 12 which states that it should be accommodated without adverse environmental impact **or loss of good quality agricultural land**. Finally potential suitable sites are those where positive environmental benefits can be achieved by using derelict land or land requiring major environmental improvements. Verdala site does not satisfy these criteria. This site assessment exercise is not exhaustive and it is clear that certain sites were chosen to ensure that the Verdala site stands out. The Magtab site, despite the problem and the time frame to rehabilitate the site is much closer to the main tourist five star accommodation in Paceville and considering the strong argument made re conference and incentive business where these mostly make use of 4 and 5 star hotels, the Verdala site would be quite distant. In Table 3.9 the ecological value of the Verdala site is not recognised under the column Ecology Value.

2.4 Alternative Sites For Development

Several sites were listed for review as alternative development sites (Section 3.37). Nonetheless, the “*comparative and unweighted*” evaluation adopted, does not indicate any real attempt on the part of the developer to find an alternative site. The only criterion favouring the choice of the Rabat Verdala site over other sites is that it is close to an existing built-up area (see Section 3.57). It is worth pointing out that “*Most (sites) are constrained by the fact that they are on land of good agricultural value, are affected by Structure Plan or Local Plan designations, and half comprise areas that have been scheduled.*” Aren’t these ‘constraints’ particularly applicable to the Rabat Verdala site?

The arguments made in Section 3.41 suggest that the major tacit criterion for selection is the proximity to the Verdala Hotel, which is owned by the applicant. To further corroborate this claim, Section 1.7, (Second bullet) considers the golf course as a means of revitalising Grand Hotel Verdala (see also Section 1.8).

The applicant’s unwillingness to find an alternative site is clearly demonstrated by the arguments put forward by the EIS regarding the ‘Zero Option’ Scenario:

The effect of Cape Sorell on the ecology of the area is greatly exaggerated in Section 3.66. As attested in Chapter 4, this danger is also particularly prevalent with the grass species that will be used for the golf course (i.e. *Paspalum vaginatum* and Triploid Bermuda turfgrass).

It is hard to comprehend how (according to Section 3.68) the planting of grapevines “*would challenge the cultural landscape integrity*” of the area ... and the proposed golf course would not. In any case, vineyards are also planned in the proposal (see also Sections 3.85 and 3.86).

One would also question the validity of the claim that traffic and noise levels would increase if current forms of land use were maintained (Sections 3.69 – 3.70).

In Scenario 2: the fact that organic farming was not considered as an option is striking. Couldn't the energy invested in getting the water to the golf course be channelled to support such an initiative that is more socially responsive and sustainable? Improvement of water supply and traffic flow in the area could still be improved with or without the proposed development scheme ... if there is the political commitment to do it.

2.5 Maintaining A Balance Between Social, Economic And Environmental Concerns

The EIS emphasises the emotional attachment of farmers to the land (Sections 15.57 – 15.62). It also acknowledges that this attachment overrides any economic factor. Nevertheless, the report minimises the importance of this stance and advocates a strategy that forces farmers to choose other options. This tendency to marginalize socio-cultural concerns at the expense of economic gains is a recurrent theme throughout the EIS, and at times it fails to consider the absurdity of certain claims:

- A ‘big deal’ is made out of the fact that one third of full time farmers would go for retraining on the golf course (Section 15.63). What about the other two thirds? All in all (including part timer farmers) the vast majority are not willing to retrain.
- The reversibility scenario (Section 15.80) highlights the report’s inability to comprehend the value of the land so blatantly expressed by the farmers.

3. Environmental Considerations

3.1 Geology

Section 5 gives a thorough background and useful data on the geological characteristics and features of the area of the proposed development. The Commission agrees with the assessment that the proposed landscape topological modification is rather limited in scale. Furthermore, the EIS maintains that while there are risks of increased soil erosion during the construction phase of the project, these would be limited. Furthermore, during the operation of the golf course, such risks will be satisfactory controlled through the presence of soil binding turf grass all year round.

3.2 Hydrology and Hydrogeology

One main assertion made in this Section is that turf golf courses use much less fertilizers and chemicals than normal agricultural land. Furthermore, the study concludes that through the geological structures; nature of the underlying strata as well as from published work on water pollution resulting from golf courses (mainly by Cohen, S., and co-workers) the risks of contamination to the mean sea level aquifer (the main source of potable water in Malta) due to release of chemicals resulting from the operation of the proposed Golf course is not significant.

Subsequently, the Commission has reviewed some relevant literature produced by this research group (Cohen, 1995, Cohen *et al.*, 1999 , 2000, Durborow *et al.*, 2000). While the group’s main findings as quoted by the EIS (Section 6.69) support the view that the golf courses reviewed do not lead to significant pollution of aquifer waters, the

recurrent points made by these references are that all assessments of risks of water contamination as arising from the application of pesticides and chemicals in golf courses, have to be made on a site-specific basis and that such site specific assessments are to be best based on simulation models which would take into account all the relevant natural features of the site. Furthermore, the same authors (Cohen, Durborow and Barnes, 2000) state that an uncertainty analysis is a critical but often overlooked part of the modelling. There is no evidence that the present consultants for this EIS have followed such advice.

Subsequently, the Commission is of the opinion that these contamination risks to the MSLA have not been properly and sufficiently evaluated, especially in the light of the importance of this aquifer to Malta.

Moreover the contamination of the seasonal water-courses and the effects of such pesticides and fertiliser on the biodiversity are not considered.

3.3 Agriculture

Initially, this Section provides an assessment of the current situation of agricultural land-use in the area. It concludes that most of the land within the planned development may be classified as good agricultural land with optimum to sub-optimum qualities that may be improved with the right investment. Furthermore, it identifies a number of problems including seasonal wetness, erosion hazards and climatic limitations, especially low water availability.

The most evident negative impact of the proposed development as identified by the EIS itself, is the loss of good agricultural land (approx: 50 ha.). This impact is judged to be 'substantial' but reversible, in the sense that the golf course project as a whole may be viewed as a type of development, which is reversible. The Commission is of the opinion that this argument has not been justified. The degree of reversibility of the various impacts has to be assessed not only in the light of the natural and physical life-supporting systems (such as topsoil conservation and soil reclamation and rehabilitation), but also (and especially) in the light of the social and cultural constraints and integrity. For example, the farming population in Malta is under stress due to competing alternative land-use for more lucrative purposes (as the case of the proposed development), as well as to rapidly changing social and cultural attitudes. The proposed development is more likely to lead to a disintegration of the social and cultural community of farmers of the area in question, and such disintegration and 'reorientation' would be extremely difficult to reverse.

At this stage the Commission would like to quote from the State of the Environment Report (SoER, Schembri *et al.*, 2002): "The role of agriculture in Malta and Gozo is by far more important than its economic contribution indicates. Protecting agriculture means preserving the rural character of the landscape and the cultural heritage of our ancestors." The SoER report identifies a number of negative environmental impacts of current agricultural practices (as does the EIS, itself).

The same SoER report states that “the impacts of the agricultural sector on the environment have in fact surfaced and intensified in parallel with the shift from subsistence farming to commercial production in the absence of adequate administrative, regulatory, informative and technological structures. The challenge of mitigating these impacts is not to abandon agriculture to its own extinction, but rather to turn Malta’s farmers into stewards of the land. Only the identification of sensitive areas, such as livestock farming, and the encouragement of investment and restructuring through financial incentives, can achieve this. At the same time, the farmers and breeders must be given full educational and advisory support to change their agricultural practices to more sustainable systems”.

While there are signs of a number of ‘healthy’ initiatives within the Department of Agriculture (such as the elaboration of a Code of Good Agricultural Practice and the establishment of a Rural Development Programme, with the latter also incorporating Good Farming Practice and placing more emphasis on landscape management through a number of agri-environmental schemes), the proposed development of the golf course may in no way be considered as one of such encouraging initiatives to sustain local agriculture. The proposed ‘scheme’ includes a number of initiatives which aim at benefiting agriculture, such as: the viticulture and/or olive plantations to be part of the buffer zone area, the restoration of water courses and of rubble walls, and the setting up of an area to act as a ‘field gene bank’ for the conservation of important varieties of vines and fruit trees which are endangered. While the Commission finds these initiatives as highly commendable, there is no reason why they may not be taken up and implemented in the absence of the proposed project. Indeed such initiatives should form part of a comprehensive ‘regenerative’ programme aimed at the local agricultural sector. If the proper value of this sector is assessed not only in purely short-term monetary terms, then we are sure that the required capital investment may be forthcoming.

3.4 Landscape and Visual Amenity

The major impact identified in this Section is that of loss of character of the current landscape, due to a number of landscape modifications including the removal of rubble walls. The proposed landscape changes would render the area as ‘a more formal landscape’ while the overall openness and non-urban character would be retained.

The rest of the assessment of impacts on site character of the area to be developed, as well as of the surrounding landscape, and the manner in which the new features will compliment (or otherwise) existing landmarks such as Mdina, is evidently to a large extent quite subjective. While changes in such features have been identified quite thoroughly, whether such changes may be assigned as adverse or beneficial depends to a large degree on one’s point of view.

In this respect, it is quite likely that should the project be approved, the landscape changes it would bring about would be eventually ‘accepted’ by the local population. However, the main issue here would be whether the proposed changes would enhance the local characteristic features of the Maltese rural landscape. While, it is difficult to

define exactly the nature of such a landscape, one would wonder whether a well-tended golf course landscape would qualify as 'distinctive' to a discerning up-market tourist.

3.5 Ecology

This Section provides a full account of the current habitats and main fauna and flora of the area in question. In this respect, it may be noted that only one field survey was undertaken during March to early April. This was done during such a transitional period in order to minimize seasonal bias in the abundance and distribution of local wildlife. However the terms of reference clearly require that the study would be multi-seasonal to ensure adequate assessment at different times of the year.

Although as stated in the report the area is not designated or protected, it can easily qualify for scheduling as an Area of Ecological Importance or of Scientific Importance and it may also probably qualify also as a Special Area of Conservation [SAC] in terms of the EU Habitats Directive [EC 92/43]. If this area (or parts of it) may qualify as a priority habitat and/or if it hosts priority species (as defined in the EU habitats directive), then Article 5 of the same directive would enable the European Commission to take measures to propose such a site as a site of community importance and the member state may stand for an infringement for not having proposed such sites. Thus a proper evaluation in terms of the significance of the site as a SAC should be made.

The EIS itself recognizes two features worthy of conservation: Saqqajja-Tal-Virtu escarpment and the rubble walls and rural buildings which are protected under the Rubble Walls and Rural Structures (Conservation and Maintenance) Regulations 1997 (LN160/97).

In particular it recognizes the ecological value of the Saqqajja-Tal-Virtu escarpment carrying a high flora diversity and important habitats and communities of maquis. The plant communities occurring within the arable areas are evidently of low individual conservation value. The various features including shallow caves and rubble walls support a relatively diverse fauna. A number of bird species would also be expected to inhabit the area especially during winter.

The area includes a seasonal watercourse (Wied tal-Merhliet/Wied il-Mofru) which is considered of ecological value, though it has been degraded by road and irrigation works.

In assessing the impact of the construction phase of the golf course on the main features of ecological importance, the EIS points out that at least 95% of all zones recognized as 'ecologically sensitive' (mainly the Saqqajja-Tal-Virtu escarpment and the Wied tal-Merhliet-Wied il-Mofru water course) will be retained for zero-development and will be protected. The impact of disturbance to the fauna and flora of these zones as resulting from earth-regrading works and construction activities (dust, vibration, noise, and other interference) is judged to be minimal assuming 'good site working methods'. In the opinion of the Commission this assessment is quite naïve and places too much trust on the suggested mitigating measure of setting up a protective fence around all ecologically sensitive areas. The setting up of the fence itself may in fact constitute a significant interference to such zones, especially to the fauna species. In fact, the likely

impact of the construction phase itself on the ecologically sensitive zones (especially the escapement), should have been considered at least as being moderate in scale.

The likely impact of the application of chemicals (fertilizers and pesticide) on the water bodies and on the fauna present in them like the frog [*Discoglossus pictus*] has not been sufficiently addressed and assessed.

With respect to the use of the seashore paspalum, *Paspalum vaginatum* as the main turfgrass species for the required grassland areas, while the EIS considered the risk of this alien species invading nearby ecologically sensitive habits as major, it relegates the resultant residual impact as minor, on the basis of monitoring of spread of this species and on mitigating measures to control any eventual spread. Again such assessment is deemed to be not sufficiently realistic. A review of published literature has indicated that *P. vaginatum* appears to have the potential to be locally invasive, that is, in areas where its tolerance to salinity and inundation gives it a competitive advantage over other plant species. However, its intolerance to shade prevents it from being invasive beneath a forest canopy. This would evidently not be applicable to Malta. Incidentally, it appears that this grass may also have a negative effect on certain aquatic systems, since it has the potential to convert shallow water bodies such as lagoons to grassy fields. This potential impact on the wetland areas and aquatic habitats, has not been sufficiently assessed.

The benefits of using this turf grass species such as its low requirements for fertilizers and water, are unlikely to compensate for its “ecologically aggressive” (Section 4.32) nature. The EIS proposes a bi-annual monitoring programme of local saline marshes and ecologically sensitive areas such as sand dunes to check for the spread of this invasive species. However it is likely that by the time such a species would have reached these areas, it would be too late and periodic manual removal of the invasive specimens as an eradication measure is quite likely to be of limited use.

3.6 Archaeological and Cultural Heritage

The EIS recognizes a number of archaeological features of importance within the area of the proposed development. Furthermore it stresses the fact that the surveys undertaken were not exhaustive and could not yield (as expected) data on any likely buried archaeological remains. Likewise, the cultural significance of this typical local rural landscape is recognized, and makes it quite vulnerable to any development (Section 11.52).

The most significant potential impacts on the archaeological features have been identified as arising from the various activities during the construction phase of the project.

There will also be a significant alteration in the cultural character of the landscape through the insertion of a more formal and alien golf landscape.

The EIS attempts to address these impacts through a series of mitigating measures including an on-site archaeologist who would undertake a “watching brief”. If new

features of significance would be discovered, attempts would be made to allow physical preservation *in situ*. The proposals go so far so as to contemplate the possibility that all construction workers would receive training (from an archaeologist) so as to minimize impacts. While recognizing the degree of objectivity shown in this Section in a genuine attempt to identify the risks of the proposed development to the archaeological heritage of the area, the proposed mitigating measures sound unrealistic and at times utopian. If the proposed mitigations and retention/protection of all features (both those which have already been identified, as well as those which may yet be discovered as a result of the development) would indeed be possible, we may well end up having the first known archaeological golf-course, with golfers having the additional attraction of walking through archeologically interesting (and sensitive) sites. Common sense would dictate that the best way to protect such features is to have the golf course elsewhere.

3.6 Traffic Air and Noise Pollution

With respect to impacts arising from traffic during the construction and operations phases of the development, these have been assessed to be insignificant or of minor importance, provided that a number of measures are implemented in the project management. This conclusion appears to be reasonable.

Likewise, the impact of noise expected to be generated as a result of the various activities during the construction phase, is assessed to be minimal or not significant to nearby residential areas. This conclusion is justifiable on the basis of the data and arguments presented by the EIS. However, the Commission notes that the likely impact of the noise (especially during the construction phase) on the fauna of the ecologically sensitive areas has not been properly assessed, and indeed ignored.

The Section on air quality and microclimate (Section 14) provides reasonable though limited data on the current situation of the locality. However, as in the case of noise, the likely impact of dust deposition, as well as chemicals was only assessed as regards the nearby residential areas, and none at all, on the ecologically sensitive zones within the development area. Indeed, Section 14.50 contemplates the setting up of a “foliage barrier” in the maquis area (with species to be agreed with the Planning Authority) so as to prevent spray drift reaching the residential areas at Rabat or tal-Virtu!

3.7 The Project Within The Context of Sustainable Tourism Development

The World Tourism Organisation defines sustainable tourism development as a form of tourism development that meets the

‘needs of present tourists and host regions while protecting and enhancing opportunity for the future. It is envisaged as leading to management of all resources in such a way that economic, social and aesthetic needs can be fulfilled while maintaining cultural integrity, essential ecological processes, biological diversity and life support systems. Sustainable tourism operates in harmony with the local environment, community and culture, so that these become the permanent beneficiaries and not victims of tourism development.’

3.7.1 Golf and Sustainable Tourism

This definition has been the basis for guiding the Commission in its assessment as to whether this proposed development conforms with the requirements of sustainable tourism development. Sustainable tourism development seeks to protect and preserve the environment in all its aspects and to respect the way of life of local residents.

Firstly, the fundamental question to be asked is the following.

Can Malta develop a golf tourism product as other Mediterranean destinations have done or would the proposed golf course at Verdala be just a means of revitalising Grand Hotel Verdala?

The EIS does not consider Malta to be a golf destination and hence the argument that Malta is losing to its competitors by not having an international standard golf course does not apply. Malta and Gozo can never match such competition since these destinations are all golf tourism resorts considering the number of courses available to potential golf tourists. The Mediterranean is cluttered with golf resorts e.g. Algarve (Portugal), Provence (France) and Antalya (Turkey). Therefore, to match such competition more courses will be required creating further environmental and other pressures. In this sense golf tourism cannot be considered as a sustainable tourism activity for Malta in view of the nature of such a form of development. It is also common for golf tourists to play on more than one course during their stay and therefore the difficulty in providing more than one course in Malta would constrain the growth of this sector. A report prepared for the then National Tourism Organisation by Hawtree and Son (1988) stated that 'serious golfers will only travel to an area where there is more than one course, preferably five or six so that a different course can be played on each day of a 7 day tour'. This report also confirms that 'the island is too small, and agricultural and horticultural land presently too valued for golf to become a popular tourist attraction per se.' Therefore this confirms that a golf course will only function as a facility and Malta will find it very difficult to penetrate the golf tourism markets.

The EIS also indicates that the proposed golf course might not be able to sustain the level of demand by casual visitors being forecasted in the report itself. It suggests that this has to be curtailed thus reducing the potential economic benefit that is being used as another main argument to justify this golf course development. This confirms the suspicion that one golf course might not be enough to reach the economic contribution from golf tourism being suggested and therefore this will create additional pressures for more golf courses to be constructed as the Verdala golf course starts to lose visitors. It is generally accepted that golf tourists prefer to play on more than one course during their stay [already stated above]. The lack of additional courses might therefore render the proposed Verdala golf course unsustainable. Greece currently has only 6 golf courses and 10 are in the planning or construction stage and is yet not on the golf tourism map. 2000 golf courses come on stream annually. Can Malta really compete in this sector with other destinations?

The environmental concerns with regard to the development of a golf course at Verdala are such that one cannot consider this development in line with the definition of

sustainable tourism development above. The high demand for water resources, the displacement of agricultural activities, the significant disturbance to ecological habitats, as mentioned in the EIS, are enough to preclude this project from being considered sustainable.

The estimates in the EIS with regard to latent demand has been estimated on the basis of the percentage of tourists from Malta's main markets that are golfers. This ratio cannot be applied to Malta since the type of tourist coming to Malta might be different from the average golf tourist. Such demand should have been estimated by conducting a survey amongst tourists visiting Malta to determine whether they would play golf or whether they would choose Malta to play golf. It cannot be assumed that out of 1000 UK tourists visiting Malta 44 of them would play golf. It depends on the type of tourist and his/her motivations to visit Malta. The Tourist Survey carried out by the Planning Authority (now MEPA) in 1997 indicated that very few tourists stated that they played golf during their stay and those that did had done so during the summer months.

The report states that 95% of delegates at a *Conference and Incentive Tour Organisers* Conference held in Malta (Section 3.13) indicated that the presence of a golf course is a very important factor in deciding on a destination. However, a survey on The Conference and Incentive Travel Market in Malta for the year 2002, conducted by MTA hardly indicates that respondents considered a golf course as a determining factor to choosing Malta to hold their conference. The same survey indicates that May was the peak for incentive business and September for Conference business. Therefore the argument that golf tourism would bring more conference and incentive tourists during the winter months i.e. November to February, is at this stage, pure speculation.

Looking at the estimates in para. 3.17, if one were to consider only those tourists who would be attracted to Malta specifically because of the Verdala golf course the number would be 2000 golfers a year. The other estimates given, indicate that these visitors would play golf once a course is available, but did not come specifically for the course and would have still come to Malta. Therefore, one asks: does a market of 2000 justify the construction of a course over good quality agricultural land and sensitive ecological habitats and a hydrological sensitive area ?

Golf development has generally been associated with real estate development since the opportunity of owning a property adjacent to a golf course is an attractive proposition. This begs the question whether the golf course development proposed at Verdala is really a ploy to increase the appeal, and therefore the price, of the properties being constructed next to the Verdala hotel rather than a 'genuine' intention to develop a tourism facility. In fact, the developer has already been marketing and promoting the residential properties with a golf course in the vicinity. The Essex Golf Report (1992) states that the value of the land having a planning permission for a golf course is likely to increase the added value of the land by two or three times its agricultural value. This increases the speculative pressures on this land.

The EIS is assuming that the local participation rate in the sports of golf would increase once a facility is provided. This is a possibility but considering the fact that this is an expensive sport (purchase of equipment like golf clubs and balls and fees) one cannot easily assume that Maltese will flock to play the game. Besides there is always the

question related to the capacity of the course and once this is reached potential players may be refused. On the other hand, should demand increase, pressure will be made to have more golf courses around the island and considering the limited resources that would be available for such development this would place pressure on other environmentally and culturally sensitive areas thus undermining the principles of sustainable development. In Malta's case golf tourism cannot be a sustainable option due to the islands' limited resources. Cyprus, which is 29 times the size of Malta, has only 4 to 5 courses.

With regard to the assessment of the site against the Golf Course Development Policy Paper issued by PA in 1997 the Verdala site fails on a number of locational criteria. The development of a golf course on this site will:

- Not bring positive environmental benefits by utilising derelict land of no ecological importance or other land requiring major environmental improvements;
- have an adverse environmental impact as a result of the loss of good quality agricultural land since part of the land is currently used for agriculture and indicated as of Agricultural value;
- adversely affect the aquifer protection zone;
- require the substantial movement of material and soil considering the site is sloping;
- not bring about significant environmental enhancement or other planning gain to the area;

The argument often used, and stated in the Structure Plan (para 13.2) that golf course development is 'a permanent guarantee that the site they occupy is unlikely to be urbanised' does not apply in this case since the Verdala area is outside the Development Zone and it is therefore already protected from urban development.

Chapter 11 clearly confirms that the site will be subject to significant modifications to engineer the golf course and therefore rubble walls will be removed and some archaeological features will be adversely affected. However, other rubble walls will be built. Yet the question is not how much rubble walls will be built but the re-engineering of this stretch of land and the modification of the hydrological processes. The golf course will create an entirely new landscape, although (possibly) pleasing visually, yet it will modify ecosystems and hydrological processes in the area.

From the above discussion it is clear that the development of a golf course on the Verdala site would not constitute a sustainable tourism development as a result of the serious environmental and social impacts. This does not mean that should there be a more appropriate and a lesser environmentally sensitive site such a facility should not be developed, but certainly such a facility at the Verdala site is a serious cause for concern.

3.7.2 *Time to make Fundamental and Strategic Choices*

There is no question that the tourist industry in Malta is a main key economic factor, contributing as it does almost 25% of the national product. Furthermore, as stated by John Pollacco in his recent publication, 'In the National Interest-Towards a Sustainable Tourism Industry in Malta' (2003), the industry today is at the crossroads. "We come to realise that we have made big mistakes and that a change, a big change is now called for".

Clearly, tourism development should be viewed within the whole context of development in Malta and against the background of 'the way we do things'. Ensuring sustainability in all our activities is becoming a crucial key requirement in the national interest and has moved beyond simple 'green rhetoric'. Unfortunately, and possibly as a direct result of the depletion (and assault) of our natural, social and cultural resources, there has been a growing attempt to 'romanticize' the concept of sustainability leading to 'armchair environmentalism' which is often far removed from the reality of life. In fact, there is evidence to suggest that some of the negative reactions to this proposal as witnessed over the past two years, verge on such 'green rhetoric'. Supporters of this golf course proposal have pounced upon this fact. As has been aptly stated by Mr. Angelo Xuereb (The Sunday Times, 6 June 2004): "We should not just complain about problems and do nothing to solve them.... Remember it is much easier to be a talker than to be a doer". Therefore, as far as the Commission is concerned, sustainability options are arrived at through a levelheaded and clear understanding of our strengths and our weaknesses, and most of all, of our long-term national interests.

It is through this realistic approach that the current efforts to ensure sustainability in all our national efforts and policy decision-making have to be viewed. It is through this perspective that the National Commission for Sustainable Development is striving to formulate Malta's National Strategy for Sustainable Development, and within which, a strategy for sustainable tourism will need to be formulated and implemented.

Stevens (2004) has very recently pointed out that demands for sustainable tourism by our tourist clients, is shown and manifest in demands in terms of quality, service standards and the overall experience. Such clients can easily recognize high quality destinations in countries where there is a wider commitment to the principles of sustainability as evidenced by quality of our landscape and scenery, respect and promotion of culture and of our national identity, and a strong cultural sense of place underpinned by broad-based sustainability development programmes. In other words, the solution to finding a sustainable approach rests in the way the destination as a whole is managed. In this context, the Commission believes that selling Malta as a golf destination at the expense of our socio-cultural and natural assets (or of natural capital stock, as required by MEPA in its terms of reference to the EIS) does not qualify as a sensible sustainable option. This should be recognized by our decision and policy makers, as well as by those authorities responsible for reviewing and considering this particular development application. On this basis, this application should be rejected.

Furthermore, the relevant authorities should clearly recognize the fact that this EIS itself has produced evidence of significant negative pressures on the current integrity of the locality in question (such as dwindling zones of ecological interest, rubble walls in

ruins, unprotected archaeological features, etc..). Rejecting this proposal would not be sufficient to protect its 'natural capital stock'. We need to be much more proactive than that and to implement in earnest, a regeneration and restoration programme which would not depend on investment and capital gained from self-sacrificing the same capital as the proposed golf course development would do. We must act less like being 'talkers' and more like being 'doers'.

4. Conclusion

After considering in depth the various implications of the proposed development, the Commission, is **of the opinion that**:

- a) the EIS fails to properly assess the significance of negative impacts of the proposed development on a number of key resources including hydrology, agriculture, landscape, ecologically sensitive habitats, and cultural identity.

- b) no matter how skilfully portrayed, the proposed development is not in line with sustainability principles and is essentially a breach of land-use and other policies. Going ahead with the proposed development would be giving citizens (expected to take ownership of sustainable development policies) the following conflicting messages:
 - while the whole nation is gearing up to the formulation of Malta's National Strategy for Sustainable Development, approving a similar proposal would sanction attempts that undermine the very principles that make up the backbone of this strategy, and
 - we cannot on the one hand stress the need for law enforcement and on the other close a blind eye for development plans that are a clear breach of policy. Such situations indicate a deficit in social justice and generate a lot of justified resentment and frustration in the populace, who feel 'powerless' when confronted with these 'exceptions' to the law.

Therefore, the Commission **urges** decision makers to make the bold step in favour of sustainable development by fully addressing societal concerns as well as long-term economic ones as already demonstrated by the Church's transfer of its land to Government.

Furthermore, the Commission **invites** decision makers to appreciate the environmentally responsible initiatives taken up by the farmers in an attempt to halt the development planned for the site, and encourage policy makers in the Tourism Industry to adopt creative strategies that discover new niche markets that are in tune with our social, economic and environmental needs.

5. References

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Appendix 1:

Processing of the data from the questionnaire administered to farmers.

- a) Certain questions (e.g. q. 28) in the questionnaire are leading questions
- b) Figures shown in Table 15.1 do not match the information given in Sections 15.15 – 15.17. The data is proposed again below:

	Fields	%
a. Total (b + c)	246	100
b. Established tenancy	229	93.1
c. No established tenancy	17	6.9

Fields for whom farmers were identified:	182 fields	98 farmers
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	Farmers	%
Fields for whom farmers were identified	98	100
Questionnaire given to	66	67.3
Refused to answer	5	5.1
Completed questionnaires (N = 98)	61	62.2*

*not 66% response rate in terms of farmers as claimed in Section 15.17

- c) How was the 74% response rate in terms of fields, claimed in Section 15.17 reached? (182 fields represent the whole sample of fields owned by 98 farmers ... Section 15.15)
- d) Table 15.2: if last column should represent % of age ... it does not tally with info in Section 15.22. If not what does it represent?
- e) The Chart on Family Size of Farmers presented in Section 15.22 provides no data.
- f) Section 15.23: no data is provided re occupations of part-time farmers ... just qualitative remarks (e.g. “most”, “almost entirely”)
- g) If data on age was grouped in categories, how is it that the ages cited in Section 15.24 are specific?
- h) Most of the data discussed in Sections 15.25 – 15.28 is not provided.
- i) Data for the conclusions reached in Section 15.30 are not presented.

- h) Section 15.35 reports that the vast majority shows that the farmers' children will farm land. While admitting that "on the job" training is the most common practice among these children, the EIS attempts to marginalize this issue by claiming that the lack of agriculture education of children will prevent them from taking up farming as an occupation.
- j) The validity of the calculations of the financial estimates proposed in Section 15.140 are rather dubious.