



Interdiocesan Environment Commission

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5th November 2018

Jean-Claude Juncker and the College of Commissioners,
European Commission,
Brussels

Antonio Tajani,
President of the European Parliament,
Brussels

Message for World Town Planning Day – Public Participation in the Cost-Benefit-Analysis process

The Interdiocesan Environment Commission in Malta (KA) came into being in 2003, after the Diocesan Synod Document “Culture-Society-Church” suggested the setting up of an Environment Commission within the Pastoral Secretariat of the local Roman Catholic Church. Its aim is that of creating awareness of the responsibility and the ethics of safeguarding the environment, defining the policy/rules that should guide those responsible in the dioceses of Malta and Gozo in environmental questions. It also offers technical and scientific suggestions to Church Authorities in specific matters concerning the environment. Moreover, it has been advocating environmentally sustainable life-styles and community-based policies since its inception.

On the occasion of World Town Planning Day 2018, which falls on 8th November, the KA would like to make a proposal to the European Commission and European Parliament relating to public participation in the preparation of the Cost-Benefit-Analyses (CBA). We are taking this initiative in the knowledge that the European Union is made up of communities living in urban and rural settings across all Member States. The KA believes that its proposal is relevant not only to Malta, but also to all EU Member States whatever their size.

As you are well aware, the “CBA is an analytical tool to be used to appraise an investment decision in order to assess the welfare change attributable to it and, in so doing, the contribution to EU cohesion policy objectives. The purpose of the CBA is to facilitate a more efficient allocation of resources, demonstrating the convenience for society of a particular intervention rather than possible alternatives”.¹ It is required as part of an application for the tapping of European Union funds for the realisation of projects of a certain size. The CBA requires that options are studied and then, depending on the outcome of the studies of such options, the preferred option is chosen.

¹ Guide to Cost-Benefit Analysis of Investment Projects – Economic Appraisal Tool for Cohesion Policy 2014 – 2020, *European Commission Directorate-General for Regional and Urban Policy, December 2014*

The KA's concern is that, so far, the CBA guide or the funding requirements for projects that require a CBA do not ask for a mandatory public consultation on the options to be studied at the earliest stage of the CBA. Such options are chosen by the project proponents, in many cases national or local governments. Moreover, there is no requirement that the CBA, in its entirety, is to be made available to the public.

The KA therefore invites the European Commission and the European Parliament to make the necessary changes to the appropriate legal instruments that regulate funding which require a CBA so that

1. there is public consultation in the choice of options to be studied in the CBA;
2. in the CBA report that is submitted to the Commission as part of the application for funding a project, an addendum listing the options that were submitted by the public as part of the public consultation mentioned in point 1 above is to be attached;
3. apart from the detailed studies of the options that are chosen for consideration and from which the preferred option is chosen, the report has to provide less-detailed financial, economic, social and environmental reasons justifying the rejection (if this would be the case) of the other options submitted by the public;
4. the CBA report in its entirety is to be made available to the public and no so-called 'commercial reasons' can be invoked by project proponents to justify the non-publication of the CBA report.

The reasons for the KA's proposal are the following:

1. Projects that are funded by the EU and which require a CBA are projects that have an impact on communities. Good sense requires that communities have a say at the very initial stage of the consideration of such projects. Communities are normally involved too late in the day when there is the actual planning application submitted to the relevant planning and/or environmental authorities, and public consultation is required in accordance with local planning legislation and the EIA Directive. In some cases, projects may also be based on development plans that would have become obsolete given that they would not have been reviewed for many years since their original adoption, and therefore would not reflect the communities' current and future needs. Thus, timely public participation becomes more important.
 2. The timely public consultation as suggested by the KA has the potential to minimise the risk that a more cost-effective, environmentally-sustainable and innovative option would miss being considered for funding while other less sustainable options would be approved.
 3. Many argue that such a proposal is yet another bureaucratic hurdle for economic development. On the contrary, bureaucracy which is at the service of communities, is commendable and should not be dismissed. The avoidance of
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bureaucracy may be an argument put forward by those who favour players in certain economic sectors and not in others, and who do not put transparency and a level playing field as priorities in their policy-making.

Given the above reasons, the KA invites the European Commission and the European Parliament to favourably consider its proposal.

Kind regards,

Mario Camenzuli
Chairperson
Interdiocesan Environment Commission, Malta

cc Mr David Casa MEP
Dr Miriam Dalli MEP
Dr Roberta Metsola MEP
Ms Marlene Mizzi MEP
Dr Alfred Sant MEP
Dr Francis Zammit Dimech MEP
