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TOWARDS SUSTAINABLE CONNECTIVITY BETWEEN MALTA AND GOZO

STATEMENT BY THE CHURCH ENVIRONMENT COMMISSION

The issue of accessibility between Malta and Gozo has gradually become the topic of the day in local public discussion, and many are expressing their concerns about the way the issue is being tackled, to the extent that some have reconsidered their position and are now against the proposed tunnel. The Interdiocesan Environment Commission (KA) has deemed it necessary to propose its reflections towards a more balanced and intelligent discussion, further to what the KA itself has already stated on the matter and other related principles.

Guiding principle

In his encyclical *Laudato Si'* Pope Francis provides us with the principles which should inspire us when taking important decisions like the ones proposed:

An Environmental Impact Assessment should not follow the drawing up of a business proposition or the proposal of a particular policy, plan or programme. It should form part of the process at the initial stage, and be carried out in a way which is interdisciplinary, transparent and free of all economic or political pressure. It should be linked to a study of working conditions and the possible effects on people's physical and mental health, on the local economy and on public safety. Economic returns can thus be forecast more realistically, taking into account potential scenarios and the eventual need for further investment to correct possible undesired effects. A consensus should always be reached between the different stakeholders, who can offer a variety of approaches, solutions and alternatives. The local population should have a special place at the table; members of the community are concerned about their own future and that of their children, and can consider goals transcending immediate economic interest. We need to stop thinking in terms of "interventions" to save the environment in favour of policies developed and debated by all interested parties. The participation of the latter also entails being fully

informed about such projects and their different risks and possibilities; this includes not just preliminary decisions but also various follow-up activities and continued monitoring. Honesty and truth are needed in scientific and political discussions; these should not be limited to the issue of whether or not a particular project is permitted by law.¹

These principles have motivated the KA to make the following comments and recommendations:

1. The need for studies and analysis of all the alternatives for better accessibility

We have lately been given to understand that the only viable solution for accessibility between the two islands is that of a tunnel catering for vehicular traffic. This discussion has been going on for the last fifty years, and the KA fails to understand how we have adopted a ‘tunnel vision’ without comparing and testing other alternatives that meet the needs of people crossing the channel. The KA believes that there exists no sound and reliable information in the public domain which could help one make a good analysis of the possible alternatives which would truly improve accessibility. The public is currently being fed information and assertions that are not backed by readily available evidence.

In a meeting organized by Wirt Għawdex on the 18th March, the Chairman of the Malta–Gozo steering committee tried to put everybody’s mind at rest that the project will have no negative impacts.² But his arguments were based on promises and speculation and not on tangible evidence. On the other hand, drawing comparisons between the level of pollution generated by the Gozo Channel ships ferries and vehicles which would otherwise use the tunnel only manages to raise more questions instead of proofs, considering that no detailed reference has been made to the quoted studies.

Past promises of a fast ferry service and that of a fourth ship in the Gozo Channel fleet are as yet, unfulfilled. The fact that the process involving the call for tenders for a fast ferry service has raised and is still raising a lot of questions, has prevented this project from materializing. A fast ferry service from Gozo to a number of ports of call in Malta to accommodate the needs of the Gozitans may go a long way in alleviating the

¹ Encyclical *Laudato Si’*. Chap. 5, par. 183. http://w2.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html

² <https://www.tvm.com.mt/en/news/gozo-channel-ferries-pollute-13-times-more-than-if-the-vehicles-on-board-had-to-use-a-tunnel/>

problems of accessibility since commuters will not be caught up in traffic as they drive to their destination. Many Gozitans still remember the highly convenient service offered by the Fast Ferry (which operated also from Marsalforn), together with the Gozo Channel ferry to Ċirkewwa, the service for the carriage of cargo to and from Sa Maison, and the helicopter service from the Gozo Heliport to and from Malta International Airport.

Summer is almost here and the Gozo Channel is still operating only three ships that have been in service for eighteen years. In the absence of an improvement in the service and/or the introduction of new services which do not require a hefty capital expenditure when compared to a tunnel, arguments in favour of the latter become stronger, as the other options are not considered, let alone experienced by commuters. The longer we take to adopt these options, the more people are convinced that the tunnel is the best solution to all the problems facing Gozo. If we are not careful, this can easily degenerate into a form of social engineering that would be counteractive to promoting the common good.

The KA feels it should ask: Would the construction of the tunnel have any bearing on the Public Service Obligation (PSO) of the Gozo Channel? How would the financial sustainability of the company be affected? Would the company still be allowed to be supported by public funds?

2. The Malta–Gozo helicopter service

The KA is pleased to note Government's commitment with the Gozitan people to reintroduce the helicopter service between the two islands,³ and hopes that the necessary preliminary studies which are to be carried out be published so that any negative impacts that this service may cause would be minimised after due consultation with all stakeholders. The KA considers this decision as a sign that the Government rightly acknowledges that this service improves the accessibility of tourists to Gozo and is very convenient for Gozitans who need to travel to the airport.

Nonetheless, the KA is concerned at the way the helicopter emergency service operating between the Gozo General hospital and Mater Dei Hospital has deteriorated. For many years this emergency service had served to "shorten" the distance between the two hospitals, and emergency cases could reach Mater Dei Hospital in no time at all. Despite the significant improvement in both hospitals, it is

³ <https://www.tvn.com.mt/en/news/government-announces-introduction-of-helicopter-service-between-malta-and-gozo/>

obvious that not only has this service become inefficient, but it is also posing a risk to patients. Suffice it to say that the helicopter landing pads are no longer a few metres away from the emergency departments at the hospitals of both islands, but they are now kilometres away – at Xewkija and at St Lukes Hospital. The KA feels that, in the interest of Gozitans, this emergency service should be urgently upgraded and the proposal for a tunnel should never be presented as an alternative for a reliable helicopter service which would not be hindered by traffic constraints in transporting patients to hospital on time.

3. Electoral promises

In a set of proposals for the 2017 general elections,⁴ the KA appealed to political parties to refrain from making promises related to particular projects involving the use of land or specific areas of land. It maintained that “When this takes place, the need for a serious environmental impact and sustainability assessment of the project would be undermined because “the people would have decided”. Such promises vitiate the whole planning process which should safeguard the interests of the whole community. An electoral victory should not justify the elimination of a process that evaluates the complex impacts of a particular project. If this occurs, the common citizen would have been deprived of the right to access all the facts so that he will be able to analyse calmly the proposed project.” The KA had made this point in its appeals to the political parties during a conference organized on the occasion of the publication of Pope Francis’ encyclical *Laudato Si’*, when it said that “such promises can hijack the common good”.⁵

A proposal for the use of land for a specific aim in an electoral manifesto, does not mean that once that electoral manifesto is approved by the electorate, the Government would be free to override the laws of the state, which laws would have been approved by the representatives of the people themselves. The Government is obliged to safeguard, and make careful use of the country’s resources by looking into other options which lead to the same objective the people would have voted for. It is worrying that the Government seems to be promoting a tunnel only for vehicular transit, when

⁴ *Twenty Proposals to Political Parties for the 2017 General Election*, 11th May 2017.

<http://ms.maltadiocese.org/WEBSITE/2017/PRESS%20RELEASES/37%20KA%20GENERAL%20ELECTION%20PROPOSALS%20EN.pdf>

⁵ Proposals by the KA inspired by Pope Francis’ encyclical *Laudato Si’* on the Care of Our Common Home, 5th December 2015. http://thechurchinmalta.org/files/article/138_KA_PROPOSTI_-_KNISJA.144933985025.pdf

the PL electoral manifesto refers simply to a tunnel, without going into details about the particular means of transport, that is whether vehicular or rail.⁶

4. Cost–Benefit Analysis of the alternative options

The KA looks forward to the publication in full of a Cost–Benefit Analysis (CBA) of the various alternative options to the tunnel for vehicular use. These options include: a fast ferry service; an additional ship for Gozo Channel; a completely new fleet for Gozo Channel and a tunnel for rail use (as suggested by the Gozo Tourism Association) which would form part of a national system of mass transit for the Maltese Islands.

The KA expects that these options be the subject of a public consultation exercise so that all of them would be thoroughly explored. Such exercise at this stage would stimulate a competition of ideas from innovative enterprises (that truly fall within such a definition) operating in the maritime, transport, construction and engineering sectors. This would hopefully provide the best solution in the economic, environmental and social aspects to the problem of accessibility between Gozo and Malta.

The CBA is mandatory if the Government needs to apply for EU funds over a certain threshold. But the KA encourages the Government to carry out the CBA and the public consultation about the various options, irrespective of whether EU funds are applied for or not, so that the final decision would really have taken into consideration all options and their impact on the sustainable future of Gozo. It can turn out that the financial, economic, environmental and social impacts of the options and the risks associated with them could be more positive (or less negative) from those of a tunnel for vehicular traffic.

The fact that the two major political parties may agree that a tunnel for cars is the best option for Gozo (even in the absence of the relevant studies made public in their entirety) does not render a tunnel for vehicles any better than other options. Agreement on such an issue between political parties can never substitute truly credible studies. The KA would like to recall the arguments of both parties in favour of a golf course more than ten years ago, when it was declared that this was indispensable for the future of Malta's tourism industry and therefore for the economy in general. Needless to say no reliable studies had been carried out to corroborate this statement. These projects did not materialize; but neither did the disasters we were warned would befall the tourism industry and the Maltese economy. Their approval

⁶ *L-Aqwa Żmien ta' Pajjiżna - Konnettività aħjar li tixraq lil Għawdex* pg. 67.
<http://www.one.com.mt/news/wp-content/uploads/2017/05/MANIFEST-2017.pdf>

would have dealt a blow to the islands' environmental heritage. The KA hopes that once again in the current issue, common sense would prevail.

One must bear in mind that with or without the tunnel, the ferry service must remain. Firstly because of tourism. Tourists are more likely to prefer enjoying open views on their way to the ferry and on the ferry itself, rather than having to stare at the walls for more than twelve kilometres. Secondly, one has to cater for alternative means of transit in the event that the tunnel needs to be closed temporarily for some reason or other.

The final expense of the massive and irreversible project of a tunnel (unlike that of projects of a smaller scale) runs the risk of being much higher than projected. It's the extent of the resultant miscalculation that makes the whole difference, because the people will eventually have to bear the brunt.

5. Fares for crossing the channel

The affordability of every fare for the service offered by all options is a very important aspect that needs to be studied even in the context of State Aid. Any type of service of whatever nature carries a cost. No proposal offering better accessibility can ever be free to users, even if it is linked to a Public Service Obligation. It cannot either be cost-free to the operator, or much less to the Government and the taxpayer. The KA reiterates what it said about the subject in October 2013: before reaching a final decision on the project, the fare that one would be obliged to pay for the service has to be carefully studied and made public.⁷

It would be absurd to initially keep the charge low to render the option chosen more appealing, only to raise it substantially after a short number of years. The process of the call for tenders should be open and transparent clearly indicating the package to be enjoyed by the winner of the tender for any option chosen. Much has been said about "innovative" valuations that only manage to impress for the scandal they cause rather than for their innovation.

⁷ *Pajjiżna ma jiflaħx aktar għal żvilupp li mhux sostenibbli*, 15th October 2013.

<http://ms.maltadiocese.org/WEBSITE/2017/KA/12.%202013-10-15%20-%20%c5%bbvilupp%20Sostenibbli.pdf>

6. Economic, environmental, social and cultural impacts of the various options on Gozo

These impacts deserve to be carefully studied. A tunnel may cause Gozo to lose the beauty of its characteristic landscape, just as is happening in various Maltese localities. One must also identify the impacts on the communities who have occupied the areas where the entrance/exit to the proposed tunnel will be located (L-Għerien /L-Imbordin/Il-Manikata). To have a project which ignores the interests of small communities who, in spite of their size, are a testimony to the richness of our history and culture, poses a danger to every small community in Malta and Gozo that endeavours to safeguard the unique cultural heritage of our islands.

The Government and the Malta Developers Association have lately stated that the tunnel would not mean that a building sprawl will not occur at Gozo.⁸ The KA fails to understand the reasoning behind these claims. History, experience and a good look around us are a clear indication of what happens when Government and developers become bedfellows.

If the statement that Gozo would not be built is to be taken seriously, Government should: (i) publish the Local Plan for Gozo that has been prepared years ago and through their publication show that the development boundaries are actually being frozen (ii) urgently update the Rural Policy and Design Guidance to stop justifying the building of houses out of a pile of rubble in Outside Development Zones – this policy is a way of legitimizing abuses in planning on the basis of legalistic arguments which shame both users of such arguments as well as their beneficiaries, and (iii) review as soon as possible the Fuel Stations Policy.

Statements that the development zones have not been extended do not tally with the ongoing approval of planning policies permitting development in ODZ. An increase in property prices in Gozo resulting from the choice of a particular connectivity option will be potentially detrimental to those Gozitans wishing to buy property in Gozo. The advantages brought about by a solution to the accessibility issue may be seriously jeopardized by a crisis in the cost of property in Gozo.

It has been stated (without any reference to published studies substantiating such claims) that for an underground or railway system to be viable, the population on Gozo would have to increase. Using the same argument, most localities in our islands would

⁸ <http://www.independent.com.mt/articles/2019-02-17/local-news/Building-a-tunnel-should-not-mean-building-up-Gozo-MDA-president-Sandro-Chetcuti-6736203775> and <https://www.timesofmalta.com/articles/view/20190217/local/tunnels-trains-and-tarmac-muscat-details-plans-for-infrastructure-of.702285>

not be served by the gas cylinder distribution system or public transport services, since these routes would not be considered viable. On the other hand, a tunnel used by a rail forming part of a national rail system may be viable, especially if the initial phase would be that connecting Gozo to Mater Dei Hospital and Valletta. It does not follow that with the introduction of other options to the tunnel for vehicles, the public transport service from Gozo to Mater Dei Hospital, and eventually to the airport cannot also be free of charge. The KA finds it worrying that the possibility of a means of mass transport is not being considered, at least for the time being. This applies for the whole country in general, and not solely in relation to the accessibility issue between the islands.

The economic aspect has to be studied in detail, and will have to go beyond the idea that better accessibility (whatever the means of accessibility) may solve all the economic and investment challenges of Gozo. In this respect, the KA calls for the publication of all studies and research (including the methodologies of the research adopted and the questionnaires carried out) which have explored issues related to investment, job accessibility and job opportunities as affected and influenced by a tunnel proposal or any other means of connectivity. What is holding more business investment in Gozo? Is the distance from Malta and its harbours and airport the only handicap for such investment, or are there other factors that need to be considered irrespective of whether a tunnel is dug or not? There are various factors that influence investment decisions, and it is possible that none of them would be addressed adequately by a tunnel.

7. The highest standards in the process of choosing the best option

Every project of accessibility between Malta and Gozo—which is wholly financed by the private sector—may be financially feasible under certain aspects. Therefore, to render the project feasible a number of measures may be taken. These include: (i) that an application for EU funds be made which would mean that the investor's share in the capital outlay is decreased (ii) that fares would be higher than those currently in place and (iii) that the investor is given substantial compensation, which may include land to be developed in either Malta or Gozo. When these possibilities are made clear, the public would then be in a better position to decide whether the option chosen would really be in everybody's interest or not.

Any project chosen should be governed by high standards of transparency, value for money, competition between all interested parties, and should be sustainable in the

environmental, social and economic aspects, without creating more problems than it would be expected to solve.

Therefore, at this stage, the KA urges the Planning Authority, the Environment and Resources Authority (ERA), the Strategic Environment Assessment Focal Point (SEA Focal Point) and Transport Malta to ensure that the Environmental Impact Assessment (EIA) and the Strategic Environment Assessment (SEA) Directives be strictly adhered to without any legalistic stratagems similar to those used in the case of the changes made to the Smart City masterplan. The KA appeals to the Department of Contracts and to the Auditor General to ensure that the procedure for the selection of the option or mix of options for better accessibility between the two islands be truly above board and really provides good value for money for the development of Gozo. Above all, the selected option should not create negative impacts which would then have to be endured by Gozo and the Gozitans.

The KA once again refers to the crisis relating to the disposal of construction waste (which many were sensible enough to perceive years ago) and land reclamation which has been proposed as a solution to such crisis. The amount of excavation material generated by the excavation of the tunnel would be of an unprecedented scale. It is hoped that the decision on the option chosen for better accessibility across the channel would not be influenced by the interests of whoever sees personal gain from land reclamation.⁹

8. Gozo and Gozitans deserve the best – above all respect for intelligence

In the proposals it had made to the political parties prior to the 2017 elections, the KA had said: “Gozitans face big challenges in enjoying a just share of the country’s common good. Therefore, the process of selecting the best means of accessibility between the islands has to assess and consider in detail Gozitans’ point of view. The selection–making process should be one in which the protagonists have an open mind to all possibilities that make sense to the country as a whole.

In order to take a final decision which benefits the common good of the whole country, but, in this case, of Gozo and the Gozitans in a particular way, the following requisites are fundamental: (i) transparency in all the decision–making process (ii) the publication of all studies (**before** and not after a decision is taken) (iii) decent time is allowed for the studies to be analysed by whoever is interested and (iv) a rigorous

⁹ *Does Our Environment have to endure this much?* 9th February 2019.

<http://thechurchinmalta.org/en/posts/78678/does-our-environment-have-to-endure-this-much>

planning process. In the absence of these principles, the KA believes that opinions that will be formed in relation to the best option for an improved accessibility between the islands will not be informed. This can lead to a privileged interest group influencing, in a disproportionate way, a decision which is so important and which will have a permanent impact not only on Gozo and the Gozitans, but on the whole country.”¹⁰

One cannot but appreciate the constant and outstanding contribution of Gozo and the Gozitans to the development of our country in every aspect. The KA acknowledges the efforts of entrepreneurs and employers who have fostered prosperity in Gozo and offered work and sustainability to Gozitan families. The same applies to the genuine endeavours of people who have always done their best to consolidate the social, economic and environmental framework of Gozo without jeopardizing the unique characteristics of the island.

The way to true development does not lie in doublespeak, the hiding or manipulation of facts, and in lack of transparency. Neither can it be controlled by the personal interests of an investor to the detriment of the common good. One has to make sure that whatever the means of accessibility, there have to be all necessary structures in place so that Gozo and Gozitans would enjoy all opportunities to achieve the highest level of development.

Conclusion

In a nutshell, for the sake of transparency and fairness that underpins an adequate public consultation exercise, the KA appeals to the Government to publish in their entirety the studies and research carried out in relation to:

- a) All the alternative options for better accessibility between Malta and Gozo, clearly indicating which option or options offer the most sustainable means of accessibility from the environmental, social, economic and operational perspective;
- b) The opportunities for new jobs and investment that may be created thanks to the choice of such option/s;

¹⁰ Twenty Proposals to Political Parties for the 2017 General Election, 11th May 2017.

<http://ms.maltadiocese.org/WEBSITE/2017/PRESS%20RELEASES/37%20KA%20GENERAL%20ELECTION%20PROPOSALS%20EN.pdf>

- c) The factors that still deter investors from investing in Gozo when such options, or at least one of them, would be implemented.

The publication of the studies and research should include the methodologies used and the questionnaires carried out (where this has been the case).

Finally, the KA reiterates its appeal for the publication of any studies and research related to the issue so that the arguments put forward will be truly credible and would provide a valid contribution to the current public discussion in the interest of the common good and the future of our country.