



GOZO REGIONAL
DEVELOPMENT AUTHORITY

Regional Impact Assessment System: A Non-Technical Guide

Consultation Document

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Foreword by GRDA CEO



Although Gozo is a small island facing double insularity, remaining static is not an option. During the last years, the pace of change increased significantly and this resulted in increased resistance. However, one ought to keep in view the path undertaken over the last fifty years or more: moving away from a sleepy rural community facing almost material deprivation towards an open society enjoying material affluence and an enjoyable lifestyle. These positive developments did not occur sporadically but were the results of several policy measures and decisions taken along the years. Too many to name. Nonetheless, bad decisions were also taken - mostly underpinned by insufficient information at the time. Whatever decisions we take there will be consequences

- impacting the present and altering our development trajectory. Gozo is at a stage where, perhaps more than ever before, any change must be actively managed and encouraged only if it brings long term benefits.

The Gozo Regional Development Authority (GRDA) has been entrusted with ensuring that Regional Impact Assessment Studies (RIAS) are carried out whenever a policy, strategy, action plan or regulation of major development is drawn up and will influence Gozo.

RIAs will be key in ensuring that Gozo's specific characteristics and needs are factored in any proposed intervention and that potential impacts of the proposed intervention are assessed within the context of Gozo's regional development strategy. This will give the opportunity to Gozitan of not only being informed but also allow for greater sharing of knowledge and expertise from the people who will be impacted most by the proposal.

The GRDA is proposing a framework that is open and accountable while ensuring that robust consultation with the Gozitan community and the relevant stakeholders takes place during the critical stages of decision making. Additionally, all efforts were undertaken to ensure that the amount of details that will be required in the RIAS is equivalent to the complexity of the proposal under consideration.

The proposed framework entails a four-stage process. The first stage considers whether a proposed intervention has an impact on Gozo. This is then followed by assessing the significance of the impact of the proposed intervention on Gozo. If it results that adjustment is needed, the framework proposes that it is adjusted to ensure that Gozo's needs are addressed. Finally, to ensure adherence to the adjusted proposed intervention, active monitoring takes place.

We look forward to receiving feedback from all stakeholders on our proposals in order to work together to create a truly robust and transparent framework that will help optimising the changes for the long-term benefit of Gozo.

Introduction

The Gozo Regional Development Authority (GRDA) is issuing this consultation document ('Consultation') to obtain the feedback from interested parties – that may include Ministries, other national authorities, national entities and agencies, NGOs, constituted bodies and the public in general – in relation to the proposed application of the Regional Impact Assessment Framework as mandated by Article 8(1)(f) and Schedule II of the GRDA Act.

The Consultation document aims to encourage replies to the below questions:

Q1: What are your views regarding the proposed framework?

Q2: Do you agree with the 4-stages approach as proposed in the framework?

Q3: What are your views on the reviewing of the Impact Statement (submitted by the Proponent) by a Committee of Experts set up by the GRDA?

Q4: Do you have any comments regarding the synergies between the GRDA and the proponent?

Q5: What are your views on the cooperation plan? Do you agree with the information required as part of the cooperation plan?

Q6: Do you agree that the consultation process with the community and relevant stakeholders following the publication of the Impact Statement is conducted by the GRDA?

Q7: Do you agree with the details to be published in the Outcome Statement?

Consultation Period

This Consultation is open to the public until 28 May 2021. Interested parties are invited to submit their feedback via email to **consultations.grda@grda.mt**

Objectives of the Regional Impact Assessment System

The objective of the RIA system is to ensure that Gozo's development is factored in the planning, assessment and implementation stages of any Government intervention that will result in a significant impact on the community of Gozo.

[Key points: Enabling Legislation; Objectives of the RIA system; Principles on which the system is based]

Enabling Legislation

The requirement for a Regional Impact Assessment (RIA) study arises from the Gozo Regional Development Authority Act. The Act states that one of the functions of the Gozo Regional Development Authority (henceforth the 'Authority') is to ensure that an RIA study is carried out whenever a ministry, authority, agency or any other form of government entity intends presenting a proposal that would affect Gozo¹.

Objectives

The RIA study is part of the Authority's RIA system. It has the objective of ensuring that:

1. Gozo's specific characteristics and needs are factored in any proposed intervention submitted to Cabinet;
2. The impacts of the proposed intervention are assessed within the context of Gozo's regional development strategy;
3. Gozo is incorporated within the implementation targets and actions of such an intervention (if applicable).

¹ Article 8(1)(f) and Schedule II of the GRDA Act

Principles

The RIA system is based on two principles:

- Open, accountable and responsible decision-making through ongoing consultation with the Gozitan community and the relevant stakeholders; and
- Transparency of administration through the publication of RIAs mandated by the Gozo Regional Development Authority Act.

More detail on how these two principles are reflected in the various stages of the RIA system are discussed in Section 2.

How the Regional Impact Assessment System works

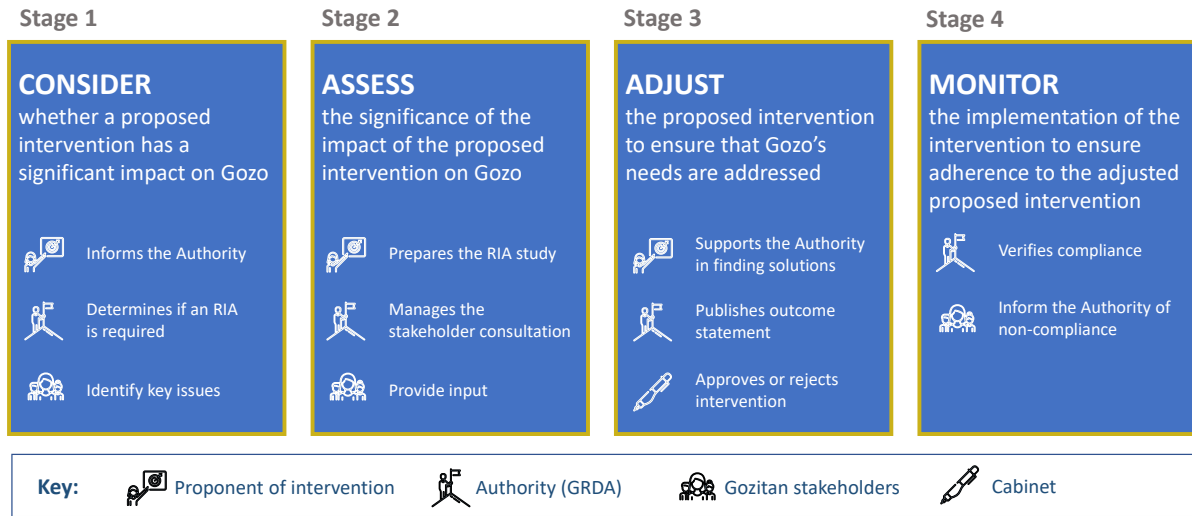
The RIA system entails a process whereby any proposed intervention submitted to Cabinet is considered, assessed, adjusted and monitored through an RIA system that: (i) measures the proposed intervention's impacts; (ii) consults with the relevant stakeholders and community members; and (iii) follows-up by monitoring the implementation of the intervention.

The RIA system entails a four-stage process which:

1. CONSIDERS whether a proposed intervention has an impact on Gozo;
2. ASSESSES the significance of the impact of the proposed intervention on Gozo;
3. ADJUSTS the proposed intervention to ensure that Gozo's needs are addressed; and
4. MONITORS the implementation of the intervention to ensure adherence to the adjusted proposed intervention.

The steps involved in each stage of the process are outlined below.

Regional Impact Assessment System



Stage 1: CONSIDER

[Key Points: Proponent informs the Authority about the proposed intervention; Authority initiates a screening process to determine whether an RIA study is required; Cooperation plan between the Proponent and the Authority for the way forward]

Stage 1 is initiated by the proponent of the intervention. This would be the office of the permanent secretary, executive chairman or chairman of the ministry, department, authority, agency or any other form of government entity (henceforth the 'Proponent') that is to undertake any one of the interventions referred to in Section 3 of this Guide.

The process should be initiated in the early development stages of the proposed intervention to ensure adherence to the 'one-proposal, one-assessment' principle and to avoid significant late adjustments to the proposed intervention to accommodate Gozo.

The Proponent initiates the process by informing the Authority of the proposed intervention. At this stage, the Proponent must provide the Authority with an initial description of a proposed intervention such that the Authority may determine whether the intervention falls within the scope of the Gozo Regional Development Authority Act.

Upon receipt of such information, the Authority's Chief Executive Officer (CEO) will initiate a process to guide the Proponent through the various stages of the RIA system, and will formally communicate with the Proponent.

Should a Proponent fail to inform the Authority of a proposed intervention, the Authority may liaise with the permanent secretary, executive chairman or chairman of the ministry, department, authority, agency or any other form of government entity to initiate the RIA process.

The Authority will guide the proponent through a Screening Process to determine whether an RIA study is required. This may require a more detailed description of the proposed intervention and will be based on the high-level criteria discussed in Section 3 of this Guide. If the outcome of the Screening Process suggests that the proposed intervention will impact Gozo in a materially different manner from its impact on Malta, the CEO of the Authority will trigger the next stage of the process through a Cooperation Plan.

A Cooperation Plan would be established between the Proponent and the Authority. This is to be developed jointly by the two parties to appropriately scope and articulate the issues to be considered. The Cooperation Plan must include:

- An outline of the information that would be required of the Proponent in the RIA study;
- A list of experts and agencies that will inform the RIA study;
- A list of relevant community members and stakeholders and how they will be engaged throughout the consultation process; and
- A timeline for both the stakeholder consultation and the completion of the RIA study.

Stage 2: ASSESS

[Key Points: Preparation of an Impact Statement by the Proponent; Stakeholder consultation managed by the Authority on behalf of the Proponent; Preparation of an Impact Assessment led by the Proponent; Publication of the Impact Statement and Impact Assessment on the Authority's website]

The assessment stage entails the preparation of an Impact Statement and, subsequently, an Impact Assessment.

The preparation of the Impact Statement is the responsibility of the Proponent. It has to collect all the relevant information and conduct a study in line with the requirements laid out in the Authority's Technical RIA Guide. The study is to be conducted by experts in the relevant field. The study should include an analysis of the potential impacts of the proposed intervention; and these should be presented in a draft Impact Statement that is to be submitted to the Authority within the timeframes outlined in the Cooperation Plan.

The draft Impact Statement will be reviewed by the Authority or an Expert Review Panel appointed by the Authority. The Proponent should respond to any information requests from the Authority or the Expert Review Panel and, based on the feedback, may have to carry out additional studies. The Impact Statement is finalised once the Authority's initial questions and concerns are addressed.

Once the Impact Statement is finalised, the Authority will notify the public that the Impact Statement is complete and posted on the Authority's website. This will be used as a basis for the Impact Assessment.

The Impact Assessment entails consultation with the community members and relevant stakeholders identified in the Cooperation Plan. The consultation process will be managed on behalf of the Proponent by the Authority and will be carried out in Gozo.

The Proponent will prepare an Impact Assessment report that summarises the conclusions drawn from the Impact Statement and incorporates the information gathered through the stakeholder consultation process.

The finalised Impact Assessment signed by the Chairman of the Authority and the Proponent responsible for the intervention, will be available on the Authority's website. The document should demonstrate that appropriate research and consultation took place in relation to the potential impact of the proposed intervention on Gozo.

Stage 3: ADJUST

If the Impact Assessment identifies any negative impacts, it will be necessary to develop strategies to mitigate them. The Authority will consider one or more of the following solutions:

- Avoidance: altering the proposal so that the impact does not occur;
- Minimisation: modifying the proposal to reduce the severity of the impact;
- Mitigation: alleviating or offsetting the impact;
- Enhancement: adding a desirable or positive feature to the proposal.

The preferred solutions will be determined by the Authority in discussions with the Proponent. This coordination is of significant importance to ensure joined-up intervention design within the context of the understanding and accounting for Gozo's distinct regional economic, social and environment characteristics.

In cases where the negative impacts or flow-on effects are simply unavoidable, or unable to be minimised, the Authority and the Proponent will need to ensure that adequate measures are put in place to control them.

Stage 4: FOLLOW-UP and MONITOR

Following the submission of the proposed intervention, the Authority will issue a Follow-up Statement setting out the final decision (as approved) regarding the proposed intervention and outlining any enforceable conditions that the Proponent must comply with.

The information collected and the results of monitoring and follow-up by the Authority will be made publicly available. This is intended to increase confidence that conditions in the Cabinet's decisions are being complied with and provide the opportunity for meaningful participation in monitoring activities by the community and relevant stakeholders.

When to prepare a Regional Impact Assessment

The RIA study is required whenever a ministry, department, authority, agency or any other form of government entity is proposing an intervention that will impact Gozo in a materially different manner from its impact on Malta.

[Key Points: Types of government intervention; Criteria that trigger RIA process]

The RIA process must be applied to any proposed intervention by a government ministry, department, authority, agency or any other form of government entity that, when implemented, will result in a significant impact on Gozo. In line article 8(1)(f) of the Gozo Regional Development Authority Act, this applies to any intervention that results from:

- a national strategy;
- a national policy;
- a national action plan;
- regulatory and legislative provision; and
- major new project or services.

As noted in Section 2, the Proponent of any intervention that may have a materially significant impact on the Gozitan community should initiate the RIA process by informing the Authority about the proposed intervention. The Authority will guide the Proponent through a Screening Process to determine whether an RIA study is required. This will be based on the high-level criteria discussed in the *Regional Impact Assessment System: A Technical Guide*².

The scenarios that may trigger an RIA study include matters that have the potential to affect any of the following:

- A large number of people;
- A specific segment of the community (e.g. businesses, employees, older generation);
- Community facilities (e.g. schools);
- Historic landmarks;
- Town aesthetics;

If the outcome of the Screening Process suggests that the proposed intervention will impact Gozo's economy, society and environment in a materially different manner from its impact on Malta, the CEO of the Authority will trigger the next stage of the process through the Cooperation Plan.

² The document 'Regional Impact Assessment System: A Technical Guide' will be presented separately.

Who prepares and participates in the Regional Impact Assessment

The RIA system requires the proponent of the intervention to prepare an Impact Statement that will serve as a basis for an Impact Assessment led by the Authority through consultation with the relevant stakeholders and community members.

The responsibilities of the various relevant players are summarised in the table below:

Stage: Player:	Consider	Assess	Adjust	Monitor
Proponent	<ul style="list-style-type: none"> - Prepares an initial description of the proposed intervention; - Informs the Authority of the proposed intervention; - Prepares a detailed description of the proposed intervention, reflecting feedback provided by the Authority; 	<ul style="list-style-type: none"> - Collects information and conducts studies as described in the Authority's Technical RIA Guide; - Considers input from stakeholders; - Undertakes analysis of potential impacts of the proposed intervention; - Prepares draft Impact Statement; - Finalises Impact Statement; - Submits the finalised Impact Statement to the Authority; - Responds to information requests of the Authority; - Conducts additional studies, as required by the Authority; - Participate and supports the Authority in stakeholder consultations; 	<ul style="list-style-type: none"> - Supports the Authority in finding a solution for any material negative impacts; 	<ul style="list-style-type: none"> - Complies with the Cabinet's decision; - Implements mitigation and follow-up measures;
Authority	<ul style="list-style-type: none"> - Reviews the initial description of the proposed intervention against requirements; - Consults community members and the relevant stakeholders on potential impacts; - Determines if an impact assessment is required; 	<ul style="list-style-type: none"> - Manages stakeholder consultation sessions on behalf of the Proponent; - Coordinates with the Proponent; - Prepares Impact Assessment Report; 	<ul style="list-style-type: none"> - Makes public the Impact Statement and the Impact Assessment on the Authority's website; 	<ul style="list-style-type: none"> - Verifies compliance with Cabinet's decision; - Uses enforcement tools to prevent non-compliance; - Establishes monitoring committees;
Community/Stakeholders	<ul style="list-style-type: none"> - Identify key issues of concern, including potential impacts; - Participate in consultation sessions; - Identify opportunities to cooperate and harmonize processes; 	<ul style="list-style-type: none"> - May contribute knowledge; - Provides input into the assessment process through the consultation sessions; 		<ul style="list-style-type: none"> - Participate in the Authority's monitoring process; - Inform the Authority of potential non-compliance;
Cabinet			<ul style="list-style-type: none"> - Decides on the proposed intervention; 	

What factors are considered in the Regional Impact Assessment

The RIA study entails a quantitative assessment of both the positive and negative impacts of the proposed intervention on the Gozitan economy, society and the environment.

[Key Points: Quantitative - comparing benefits to costs; Factors to be considered - economic, social, environmental; Level of detail - depth of analysis and content]

The RIA study should provide a detailed description of the intervention, including:

- The need for the intervention;
- Alternatives for the implementation of the intervention (e.g., choosing technologies that have lower greenhouse gas emissions); and
- Alternatives to the intervention that are feasible.

Based on the description of the proposed intervention, the RIA study should focus on three primary factors: economic, social and environmental (see box below). For each of these factor categories, the study should:

- Start with a description of the current status, and then assess the individual impacts of these factors;
- Assess both positive and negative impacts of the proposed intervention;
- Consider any negative flow-on effects that may result from the positive impacts of the intervention (e.g. an intervention may give rise to improved employment opportunities but it may also increase the need for housing for an increased workforce);
- Quantify the extent to which the positive impacts of the proposed intervention outweigh any negative impacts; and
- Consider both immediate and medium-to-long-term impacts.

These should be based on research analysis, modelling, surveys, or specially commissioned research, including any existing studies. The extent of detail should match the complexity of the issue. It should be determined in discussions with the Authority and reflected in the Cooperation Plan. The level of assessment will vary depending on the size and complexity of the issue, level of controversy, and potential impact on Gozo.

Economic

The Gozitan economy is characterised by factors that are different from those of the Maltese economy. Consequently, the extent of the impact of a proposed intervention may vary significantly

from the impact that the same intervention would have on the Maltese economy. For example, interventions that may result in job creation can have profoundly positive economic and employment impacts in Gozo even if they have a relatively immaterial impact on job creation in Malta. The economic review should discuss any such effects resulting from implementing the proposal. In particular, where applicable, it should consider the impact on:

- Existing enterprise and industry;
- Employment;
- Business or capital investment;
- Disposable income;
- Cost of business;
- Attracting business and capital to Gozo; and
- Infrastructure.

Social

In some ways, the social and community structures and characteristics of Gozo differ from those of Malta. Thus, the impact of interventions is likely to also vary significantly in terms of its social effects. It is therefore important to consider the specific positive and negative social implications of a proposal compared to the current status, including the effects on:

- Population numbers and the demographics profile;
- Access to education;
- Access to healthcare;
- Poverty alleviation;
- Housing;
- Impact on commuting between Gozo and Malta;
- Impact on culture and heritage;
- Impact on marginal groups;
- Local government facilities and services; and
- Central government facilities and services.

Environment

Environment refers to the natural surroundings, ecosystems, heritage value, and social, economic and cultural aspects. These are widely recognised as tourist attractions and are therefore a key component of the Gozitan economy. Others may be of local environmental significance or contribute to local liveability. Thus, positive and negative environmental impacts of the proposed intervention must be clearly identified and, if possible, quantified. The assessment is to include the impact on:

- Urban environment;
- Rural environment;
- Waste management;
- Climate change (mitigation and adaptation);
- Transportation; and
- Marine, maritime and land resources.

The considerations identified under the three factor categories are not exhaustive and can be supplemented with specific local knowledge and experience, where appropriate, and supported by relevant and credible evidence.

Outcomes of the Regional Impact Assessment

[Key Points: Conclusions from the RIA study; Cabinet requirements]

Outcome

On completion of the RIA study, the Authority is to prepare an Outcome Statement that makes specific reference to the RIA study setting out:

- i. The conclusions of the RIA study, clearly stating whether there will be any significant positive and negative impacts on Gozo and the severity of those impacts;
- ii. How the Authority took into account stakeholders' views in determining the effects that are likely to be caused by the proposed intervention, including a summary of comments received by the relevant stakeholders and members of the community;
- iii. The recommendations of the RIA study which were taken on board by the Proponent; and
- iv. The recommendations of the RIA study which were not taken on board by the Proponent and the reasons why the recommendations were not accepted.

The Outcome Statement should be made publicly available on the Authority's website, and the RIA study be presented as an appendix.

Definitions

Act	Gozo Regional Development Authority Act.
Authority	Gozo Regional Development Authority.
Coordination Plan	An action plan agreed between the Authority and the Proponent if the Screening Process determines that an RIA study is required.
Guide	Non-Technical RIA Guide.
Intervention	Any of the development or changes to any of the following: a national strategy; a national policy; a national action plan; regulatory and legislative provision; and major new project or services.
Proponent	The ministry, department, authority, agency or any other form of government entity proposing the intervention.
Impact Statement	Document prepared by the Proponent outlining the economic, social and environmental impacts of the proposed intervention.
Impact Assessment	Document prepared by the Proponent outlining the economic, social and environmental impacts of the proposed intervention following consultation with community members and relevant stakeholders.
Follow-up Statement	Statement issued by the Authority following Cabinet's decision regarding the proposed intervention.
Outcome Statement	Statement incorporating the conclusions of the RIA study, a summary of the stakeholders' feedback, and the recommendations to the Proponent.
RIA study	The Impact Statement and the Impact Assessment.
RIA system	The four stages: consider-assess-adjust-monitor.
Screening Process	The process which determines whether an RIA study is required.

Appendix: RIAS System Flowchart

