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Subject: Request for an investigation into the allocation and management of public land at Manoel Island currently occupied by Gżira United Football Club

To: <charles.deguara@gov.mt>

The Auditor General

National Audit Office
17, Triq Mons. Edgar Dimech
Floriana FRN 9060
Malta

20th July 2026

Dear Auditor General,

I respectfully request that the National Audit Office investigate the allocation and management of the public land currently occupied by Gżira United Football Club at Manoel Island, with particular reference to the legal basis of its occupation, the governance of any agreement entered into with the Government of Malta or the Lands Authority, and whether public assets have been managed in accordance with the principles of transparency, accountability, legality and value for money.

This request is prompted by the recent termination of the 99-year emphyteutical concession granted to MIDI plc over Manoel Island and Fort Tigné. The Government has publicly stated that it paid €43 million to regain control of Manoel Island so that it may be developed as a national park for the benefit of the public.

However, despite these declarations, part of Manoel Island is currently being occupied and operated by Gżira United Football Club, including commercial sporting facilities. To date, no comprehensive public explanation has been provided regarding the legal and financial basis of this arrangement.

The National Audit Office can determine whether the allocation and management of this public asset complies with the principles of good governance and sound public administration.

In particular, I respectfully request that the National Audit Office examine the following matters:

1. What is the legal basis for Gżira United Football Club's occupation of public land at Manoel Island? Specifically, is the occupation based on a lease, licence, concession, emphyteusis, or any other legal instrument, and which public authority granted these rights?
2. Given that the 2000 Concession Deed required MIDI plc to receive the site with vacant possession, on what legal basis is any purported reversion to a pre-2000 title or the 1976 agreement claimed following the buy-back of the MIDI concession to the Government of Malta?
3. Were all statutory requirements under the Lands Authority Act and any other applicable legislation complied with in granting or recognising these rights, and has the relevant agreement or instrument been published or otherwise made available for public scrutiny?

4. What rent, ground rent or other consideration is payable under the agreement, how was this determined, and has an independent valuation of the public land been carried out?
5. Does the agreement authorise commercial activities, including the operation of padel facilities or other revenue-generating uses?
6. Is the current occupation intended to be temporary pending the adoption of a master plan for Manoel Island, or does it constitute a long-term allocation of public land?
7. How has the State ensured that this allocation safeguards the public interest and complies with the principles of transparency, accountability, equal treatment and good governance?

I wish to emphasise that this request is not directed against Gżira United Football Club, nor does it seek to question the club's sporting role or contribution to the community.

Rather, the request concerns the stewardship of public land following the termination of one of Malta's most significant public concessions. Where public land of substantial strategic and financial value is allocated to any private organisation, whether sporting, commercial or otherwise, the public is entitled to full transparency regarding the legal basis of that allocation, the financial terms involved and the procedures followed.

Given the significant public funds expended to recover Manoel Island, together with repeated Government statements that the island would become a national park, I respectfully submit that this matter falls squarely within the National Audit Office's mandate to examine whether public assets have been managed lawfully, transparently and in accordance with the principles of good governance and value for money.

I therefore respectfully request that the National Audit Office consider opening an investigation into this matter.

Yours faithfully,

Mark Camilleri Gambin