

## Environmental Permit

Environment Protection Act (CAP. 549)

Permit number

**EP 009/10/K**

The Environment and Resources Authority (hereinafter the Authority; the Competent Authority or ERA) in exercise of its powers under the Environment Protection Act (CAP. 549) hereby authorises:

**Electronic Products Ltd.**

Company registration number: **C 21306**

(hereinafter “the Operator” or “the Permit Holder”),  
Of / Whose Registered Office (or principal place of business) is at

**93, Old Railway Track,  
Santa Venera**

to carry out waste management activities related to WEEE at:

**Garages 12, 27 & 28  
Ta' Maggi,  
Industrial Zone  
Zabbar**

to the extent authorised by and subject to the conditions of this Permit.

This permit is valid for **two (2) years** from the date below. An application for renewal of this permit is to be submitted at least six weeks prior to expiry of this permit.

Signed

Date

Prof Victor Axiak Chairman	Permit Issued: 14 / 05 / 2018
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**Authorised to sign on behalf of the Competent Authority**

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## Conditions

### 1 General

The Permitted Installation shall, subject to the conditions of this Permit, be managed, controlled and operated as described in the Application, or as otherwise previously agreed in writing by the Authority.

#### Status Log

Detail	Date
<i>Application EP</i>	11 May 2010
<i>Permit Issued</i>	26 August 2010
<i>Permit Variation</i>	30 March 2011
<i>Permit Variation</i>	01 August 2011
<i>Permit Variation</i>	26 March 2013
<i>Permit Renewal</i>	25 September 2013
<i>Permit Variation</i>	08 July 2014
<i>Permit Renewal</i>	18 August 2015
<i>Permit Variation</i>	20 October 2015
<i>Permit Renewal</i>	28 January 2016
<i>Permit Renewal</i>	08 November 2016
<i>Permit determined by ERA Board</i>	11 May 2018

### 1.1 Permitted Activities

1.1.1 The Operator is authorised to carry out the activities and the associated activities specified in Table 1.1.1.

Activity	Description of specified activity	Limits of specified activity
Storage of waste fluorescent tubes and bulbs	Storage of waste florescent tubes and bulbs	From receipt of storage waste to dispatch of waste to authorised facilities either locally or abroad
Storage and dismantling of Waste Electrical and Electronic Equipment (WEEE)	Storage and dismantling of specified types of WEEE as per condition 2.2.1 including but not limited to degassing of units containing refrigerant gases excluding dismantling of unit carcasses containing insulation panels	From receipt of waste to dispatch of dismantled WEEE components to authorised facilities either locally or abroad
Treatment of Waste Electrical and Electronic Equipment (WEEE)	Treatment of specified types of WEEE as per condition 2.2.1, 2.2.5, 2.2.6 and 2.2.7	From receipt of waste to dispatch of treated WEEE components to authorised facilities either locally or abroad

Recovery of refrigerant gases from refrigeration circuits and extraction of waste compressor oil from WEEE refrigeration equipment and air conditioning units	Extraction of refrigerant gases from WEEE and extraction of waste compressor oil. The process includes the separation of the resultant gases and oils into separate fractions for disposal, resale or reuse.	From extraction of gases and storage in specified refillable containers to either disposal at a Commission approved destruction facility or for resale/reuse as recovered refrigerant (HFC R134a only)  From extraction to storage and dispatch of extracted compressor oil to authorised facilities either locally or abroad.
Storage of waste batteries	Storage of waste batteries with EWC codes as specified in the permit	From receipt of waste to dispatch of waste batteries to authorised facilities either locally or abroad.

## 1.2 Site

- 1.2.1 The activities authorised under condition 1.1.1 shall not extend beyond the garages indicated by the Operator (garages 12, 27 & 28) at Ta' Maggi Industrial Park, at the facility shown on the Site Plan & Site Map in Schedule 2 to this Permit.

## 1.3 General Conditions

- 1.3.1 The conditions and obligations of this permit are without prejudice to any other regulation, code of practice, conditions or requirements requested by other Authorities or entities, including but not limited to, the Planning Authority, Occupational Health and Safety Authority, Transport Malta and the Malta Resources Authority.
- 1.3.2 This permit is granted saving third party rights. The Permit Holder is not excused from obtaining any other permission required by law.
- 1.3.3 In these conditions and their interpretation, all terms shall have the same meaning as that assigned to them in Subsidiary Legislation 549.63, the Waste Regulations.
- 1.3.4 The Permit Holder is to be legally responsible and accountable for managing the site in all its various aspects, thus ensuring that the waste management activity for which he has been granted a permit is carried out in accordance with the provisions as per Subsidiary Legislation 549.63 as amended, and other related legislation, as well as all the conditions of this permit.
- 1.3.5 The site must be well secured to minimise the opportunity for unauthorised entry. An employee is to be present at all times during the operational hours of the facility; and the premises must be closed and secured when no operations are taking place on site.
- 1.3.6 The company shall maintain a register of third party complaints. The register shall record the name and address of the complainant(s), the date, location, source and nature of the complaint and the corrective action undertaken, where such action proves necessary.

- 1.3.7 All plant, equipment and technical means used in operating the Permitted Installation shall be maintained in good operating condition and without causing significant polluting emissions, potentially polluting leaks and spillages. The operator shall keep maintenance records as per section 4.3.
- 1.3.8 The Permitted Installation shall be managed, controlled, supervised and operated by staff who are aware of the importance of environmental protection and suitably trained on the requirements of this Permit, in particular on those permit conditions relevant to their duties. All staff shall be provided with adequate training and written operating instructions to enable them to effectively carry out their duties. Such training shall be recorded as per condition 4.3.3.
- 1.3.9 The Authority may, on the joint application of an operator and a proposed transferee, transfer to the proposed transferee the environmental permit the transfer of the permit will also necessitate the transfer of environmental obligations and liabilities.
- 1.3.10 The Authority shall carry out regular compliance checks that vary in frequency according to the site's compliance with the permit conditions. Any such checks carried out by the Authority may be made at the Permit Holder's financial expense.
- 1.3.11 The Authority's representatives are empowered to inspect every part of the site and ask for any closed or locked areas to be opened. They are also entitled to be given any proof, documentation, plans, receipts or any other records which these Authority representatives may request.
- 1.3.12 The Authority may add, amend substitute or revoke any of the conditions of this permit after notifying the Permit Holder of its intention and after describing the changes to the Permit Holder. This, without prejudice to any prevailing circumstances that would preclude the Authority from following such a procedure.
- 1.3.13 The validity of this permit is until **14 May 2020**. The Permit Holder is able to renew the permit upon application with the Authority expressing his/her intention at least six (6) weeks prior to the expiry of the permit. The permit will be considered renewed once the official renewed permit is issued by the Authority.
- 1.3.14 This permit is issued against a bank guarantee of **€6,100 (Financial Guarantee Number G38TFC50731 dated 09 February 2018)** which shall be renewed annually. This guarantee will have to be maintained throughout the lifetime of the permit. Following renewal and/or variations to this permit, the Authority may require amendments to the Bank Guarantee.
- 1.3.15 The Authority may take part or all of the bank guarantee if the Permit Holder fails to take the necessary action, in cases of non-compliance with these permit conditions, the Act or any subsidiary legislation thereof, or in cases where environmental integrity is threatened. This bank guarantee is without prejudice to any environmental liabilities that may ensue through failure to adhere with permit conditions or any other works/activity carried out on site. Should the Authority forfeit the Bank Guarantee either in part or in full, the operator shall ensure that this is replenished without undue delay.
- 1.3.16 A copy of this permit shall be available at all times at the site office, including any Variation Notices or amendments to it.
- 1.3.17 The Authority may suspend or revoke this environmental permit or part of this environmental permit where significant mismanagement of the site is observed or any of the permit conditions are not respected after a written warning is given by the Authority or in any eventuality that gives the Authority enough reason to suspend or revoke this permit.
- 1.3.18 The operator may apply with the Authority for the release of the Bank Guarantee, which shall be released subject to the full compliance of the permit conditions, as confirmed by the Authority.

1.3.19 The Authority may request monitoring and/or review of operational practices and/or commission audits on the installation as deemed necessary to address any circumstances that may affect quality of the surrounding environment. Any required monitoring and/or audits shall be carried at the expense of the Permit Holder.

1.3.20 Without prejudice to condition 1.3.19, the authority may take any action deemed necessary including but not limited to the suspension of any activity/operation until investigations are concluded.

## 1.4 Operational Changes

1.4.1 The operator may apply for a variation in permit and shall seek the Authority's written agreement prior to any operational changes, by sending to the Authority

- a) Written notice of the details of the proposed change, including an assessment of its possible effects (including changes in emissions and waste production) on risks to the environment from the Permitted installation;
- b) Any relevant supporting information (e.g. chemical/fuel consumption, technical details, changes in the type/use of substances/mixtures, etc.);
- c) Any relevant supporting assessments and drawings, and;
- d) The proposed implementation date.

1.4.2 Any such change shall only be implemented following the issue of a variation of the permit by the Authority.

## 1.5 Improvement Programme

1.5.1 The Operator shall complete the improvements specified in Table 1.5.1 by the date specified in that table.

<b>Table 1.5.1: Improvement programme</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Deadline</b>
1	Submission of methodology for the handling and storage of fluorescent tubes, bulbs and CRTs on site. This methodology is also to include a contingency procedure in the event of breakage of fluorescent tubes, bulbs and CRTs whilst handling and storage as per conditions 2.2.5 and 2.2.6.	Within 3 months of issue of permit

## 2. Site Infrastructure and Operations

### 2.1 Site Infrastructure

2.1.1 During non-operating hours the site shall be firmly closed and totally inaccessible to third parties, both by vehicle and on foot.

2.1.2 The designated quarantine area is to be maintained within the site boundary to temporarily hold unpermitted waste that may enter the site (refer to Section 3). A non leaking skip or similar contained structure can be utilised for the temporary storage of unpermitted waste.

- 2.1.3 All handling, storage and treatment of materials or waste shall take place only in areas with impervious ground and where thorough clean up and site reinstatement can be readily undertaken.
- 2.1.4 The site shall be clearly identified by a site identification board, which shall be replaced as soon as it is damaged or the information is no longer readable from a distance. The site identification board shall be located at the site entrance and shall contain the following information:
- a. The company name and address
  - b. Permit Holder's name
  - c. List of authorised activities on site
  - d. 24 hour emergency mobile number
  - e. Permit Number (making it clear this site is permitted by the Authority)
  - f. Opening hours of the site
- 2.1.5 Only equipment as indicated during the application process can be used on site. Any changes will require a variation to this permit and authorization from the Authority.
- 2.1.6 The infrastructural set up of for the WEEE storage and treatment areas shall be carried out in compliance with the technical requirements set out in Schedule 8 of Subsidiary Legislation 549.89, the Waste Management (Electrical and Electronic Equipment) Regulations. As a minimum all the listed requirements have to be implemented at the permitted facility.

## **2.2 Permitted Operations on Site**

- 2.2.1 Only waste streams as set out in the European Waste Catalogue codes in Schedule 1 can be accepted and processed on site, according to the approved methods as set out during the application process.

With regards to WEEE, no treatment or recovery of the WEEE accepted on site is to be carried out with the exception of dismantling and separation. Only the following type of WEEE may be accepted and dismantled on site:

- Toner cartridges;
- Vending machines;
- Monitors and TV sets;
- Small household appliances;
- Large household appliances (except for fridges & freezers);
- Computers, computer towers & related IT equipment.

Fridges, freezers and geysers may also be accepted on site for storage prior to export only (no processing may take place). All other types of WEEE are strictly prohibited.

- 2.2.2 Small equipment (Category 5) as per Schedule 3 and Schedule 4 of Subsidiary Legislation 549.89, the Waste Management (Electrical and Electronic Equipment Regulations, as amended can also be accepted and processed on site. Equipment falling under any other category of this Annex, apart from those listed in 2.2.1 cannot be accepted or processed on site.
- 2.2.3 In the case of WEEE containing refrigerant gases, only storage, and removal of gases and waste compressor oils is allowed, as set out in Section 3.2.2 of this permit and as specified in the waste codes set out in the permit.
- 2.2.4 Insulation panels which could potentially contain fluorinated greenhouse gasses or ozone degraded substances shall not be dismantled but sent in their entirety to a facility permitted to accept such waste.

- 2.2.5 WEEE containing Cathode Ray Tubes (CRTs) may only be treated using the same methodology as submitted as part of the application to vary the permit and within the designated area on site. A method statement on the storage of this waste including a contingency procedure for accidental breakage whilst handling and storage prior to treatment is to be submitted for the approval of the Authority as per Table 1.5.1.
- 2.2.6 In the case of fluorescent tubes, only storage is allowed. No dismantling or crushing of these items may take place. A method statement on the storage of this waste including a contingency procedure for accidental breakage whilst handling and storage is to be submitted for the approval of the Authority as per Table 1.5.1.
- 2.2.7 WEEE materials being treated in the "E-Scrap" machinery are limited to small household appliances. No materials containing hazardous components such as fluorescent bulbs or mercury switches can be treated using this equipment.
- 2.2.8 The total combined quantity of WEEE, fluorescent tubes, waste batteries and any other hazardous waste arising from these processes stored at the permitted facility shall not exceed 49 tonnes at any given time. The operations on site are to strictly abide by the site layout plan for operations (processing and any storage) in the permitted garages as indicated during the renewal process of this permit.
- 2.2.9 Storage of waste batteries is to be carried out indoors (not open to the elements) in areas with impermeable ground in order to facilitate the clean up of potential spills.
- 2.2.10 Storage and dismantling of toner cartridges and vending machines is to be carried out according to the method statements submitted to the Authority during the application process.
- 2.2.11 The Permit Holder is to ensure that the waste is organised into the designated areas, labelled and visible physical delineation of the waste storage areas shall be put in place.

### **3. Operating Conditions**

#### **3.1 Emissions**

##### **3.1.1 Emissions to Air**

- 3.1.1.1 No emissions to air shall take place from the Permitted Installation.
- 3.1.1.2 The processing of CRT units must be contained in an approved enclosed space with an appropriate filtration system as approved by ERA.
- 3.1.1.3 All abatement equipment, units utilised to degas WEEE and ducting (including filters) shall be cleaned, maintained, and where necessary, replaced, on a regular basis and according to manufacturer specifications.

##### **3.1.2 Effluent Discharges**

- 3.1.2.1 No discharges to surface water or groundwater shall take place from the Permitted Installation
- 3.1.2.2 No discharges to the foul sewer (other than from domestic sewage or equivalent) shall take place from the Permitted Installation.
- 3.1.2.3 The Operator shall undertake all necessary measures and precautions to prevent spillage of raw materials, intermediates, products, waste and any other materials.



- 3.1.2.4 All process and storage areas must be appropriately contained.
- 3.1.2.5 Rainwater shall not be discharged into the sewer. Foul sewer drains must be strictly segregated from storm water drains.

### **3.1.3 Emissions to Land**

- 3.1.3.1 No emission from the Permitted Installation shall be made to land.
- 3.1.3.2 In the event of contamination of land, the operator shall notify the Authority within 24 hours, forward a decontamination plan for the Authority's approval and execute it within an agreed time frame.

## **3.2 Waste**

### **3.2.1 General Waste Acceptance, Storage and Handling**

- 3.2.1.1 The Permit Holder shall apply the precautionary principle to safeguard the environment whilst carrying out the permitted activities and shall immediately refuse the entry of waste that is suspected to be in breach of the conditions of this permit.
- 3.2.1.2 The Permit Holder shall ensure that all waste management operations authorised in accordance with this Permit are carried out in an orderly manner and in such a way as to cause the least possible disturbance to the surroundings and the least possible adverse impact to third parties.
- 3.2.1.3 All wastes shall be stored within their designated and controlled storage area(s) prior to ultimate disposal. Any waste that is rejected as part of the processing of waste and/or any unpermitted wastes that may inadvertently enter the site must be stored in a clearly defined and contained quarantine area (Condition 2.1.2) and not be mixed with other wastes on site.
- 3.2.1.4 All wastes leaving the site after storage and/or processing must only be sent to facilities licensed to accept the individual waste stream, either locally or abroad.
- 3.2.1.5 No storage of waste destined for disposal is permitted for a period exceeding 12 months.
- 3.2.1.6 No storage of waste destined for recovery is permitted for a period exceeding 3 years.
- 3.2.1.7 Should the operator wish to process other types of WEEE besides those indicated during the variation application process, the operator must obtain another variation to permit from the Competent Authority prior to any further WEEE types being accepted or processed on site.
- 3.2.1.8 No waste shall be handled beyond the boundary of the permitted garages. Storage, processing or repackaging of waste in the common area of the industrial complex is strictly prohibited. Movements of packaged waste outside of the permitted garage within the common area of the industrial complex for the purpose of loading may not commence prior to the arrival of the truck/container on site.
- 3.2.1.9 The Operator shall maintain records of the weight of each waste consignment received and/or removed from the site, and such data is to be collected using a properly calibrated scale. Operator is to submit details of the scale used, together with its location and calibration details. Records of waste weighed prior to loading

onto the vehicle from the point of collection may be accepted in lieu of on site weighing.

- 3.2.1.10 The Permit Holder shall ensure to issue a receipt/certificate for every consignment of wastes accepted and removed on Site indicating the date and time of the consignment and the weight of the waste received. Each receipt/certificate shall indicate the site name and permit number, as well as bearing a unique sequential number. Where applicable, this also applies to any Recycling Certificates issued by the operator.
- 3.2.1.11 Drums and containers of waste compressor oils and gases shall be stored in designated and secure storage areas (in closed containers to avoid release of ODS or f-gas). Any recovered refrigerant gas shall not be stored in disposable containers. Storage areas shall be bunded or otherwise designed so that surface and ground waters cannot be contaminated by spillages. Should drip trays be used in lieu of a fixed bunded structure, the drip trays must be able to hold at least 25% of the total storage capacity of the drums.
- 3.2.1.12 Only registered waste carriers as per activity 38 of schedule 1 of Subsidiary Legislation 549.45, the Waste Management (Activity Registration) Regulations are allowed to transport waste to and from this site.
- 3.2.1.13 All wastes leaving the site after storage and/or processing must only be sent to facilities licensed to accept the individual waste stream, either locally or abroad. In this regard, the Operator shall only make use of disposal/recovery sites that are duly permitted by the Competent Authority, as set up in Subsidiary Legislation 549.63, the Waste Regulations or by authorized waste management facilities abroad.
- 3.2.1.14 Transboundary movement of waste shall be carried out in accordance with the following regulations, as amended from time to time:
- (a) Regulation (EC) N° 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste;
  - (b) Commission Regulation (EC) N° 1418/2007 of 29 November 2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) N° 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of waste does not apply, and
  - (c) Any other applicable legislation.
- 3.2.1.15 All hazardous waste transferred off the site shall be accompanied by a valid hazardous waste Consignment Permit issued by ERA. Each consignment under the consignment permit shall be accompanied by a Consignment Note.
- 3.2.1.16 Hazardous wastes shall be stored in a labelled, closed container(s) within a designated and controlled storage area(s) prior to ultimate disposal. Wastes of different natures shall not be mixed in the same container.
- 3.2.1.17 Disposal certificates shall be kept on record and made available for inspection for a period of at least 4 years from date of their issue.
- 3.2.1.18 The operator shall strictly adhere to the Method Statements for the WEEE facility submitted as part of the application process. Any change in this method statement shall be subject to approval by the Authority.
- 3.2.1.19 Only refrigerant gas R134a can be collected for resale. All other refrigerant gases collected from the degassing of WEEE and from the oil filtering equipment must be exported as waste to a Commission approved destruction facility. Such facilities must

be in line with destruction technologies listed in Annex 7 of EC Regulation No. 1005/2009.

### **3.2.2 Waste Treatment**

- 3.2.2.1 All degassing and extraction of waste oils from compressors from processing of refrigeration equipment and air conditioning units shall be undertaken on an impermeable pavement or in self contained and or bunded area.
- 3.2.2.2 No carcass destruction of WEEE shall be carried out on site other than those mentioned in the Degassing Method Statement dated 07 April 2014 in the application process.
- 3.2.2.3 All plant and all equipment used on site utilised in connection with specified waste management operations shall be operated and maintained with the objective of preventing potentially polluting leaks and spillage of wastes.
- 3.2.2.4 Each tank, drum or other mobile container used to hold wastes associated with the operation of the plant (particularly refrigerant gases and oils) shall be clearly and unambiguously labelled regarding its contents, unless the contents are clearly identifiable by visual inspection as well as inspected and maintained as per condition 3.2.2.8 below.
- 3.2.2.5 In the event of damage or deterioration to a container that is, or is likely to cause, a leak, that container shall be repaired or replaced immediately as per condition 3.2.2.8 below.
- 3.2.2.6 Loading and unloading of waste refrigeration equipment shall be undertaken in a manner to prevent release of ODS and fluorinated greenhouse gases.
- 3.2.2.7 Containers for storage of refrigerants and residual materials shall be inspected daily for leaks.
- 3.2.2.8 Containers found to be leaking shall either be immediately transferred to a larger over-container or shall have their contents immediately transferred to an alternative container.
- 3.2.2.9 Containers used for refrigerant gas intended for resale must be refillable and in line with Directive 2010/35/EU on transportable pressure equipment.
- 3.2.2.10 Minor spillages of waste compressor oil shall be cleaned up immediately.
- 3.2.2.11 In the case of major spillages of waste compressor oil which are causing or are likely to cause polluting emissions to the environment, immediate action shall be taken to contain and clean the spillage and prevent liquid from entering surface water drains and impermeable ground.
- 3.2.2.12 Products and equipment containing ozone depleting substances (ODS) and fluorinated greenhouse gases (F-Gas) shall be transported to the site in such a way so as not to damage parts which contain such substances. The permit holder shall conform with this condition from the point of collection of such equipment until all ODS and F-Gases are extracted from this equipment and stored for destruction.
- 3.2.2.13 All installation, maintenance and servicing of equipment containing Fluorinated Greenhouse Gases shall abide by the requirements of Regulation (EU) No 517/14 on fluorinated greenhouse gases and repealing Regulation (EC) No. 842/06, Commission Regulation (EC) Nos 1516/07, 304/08, 306/08, 307/08, 1191/14, 2065/15, 2066/15, 2067/15, 2068/15, 876/16 and Subsidiary Legislation 549.55, the Regulations on Certain Fluorinated Greenhouse Gases.

- 3.2.2.14 For all equipment installed on site utilising Ozone Depleting Substances or Fluorinated Greenhouse Gases, information pertaining to installation, maintenance and servicing shall be provided when any equipment is replaced by new equipment. The authority shall be notified in this regard and details provided on the new equipment installed.
- 3.2.2.15 Upon decommissioning of all equipment containing substances falling within the scope of EC Regulation No. 1005/09 on substances that deplete the Ozone Layer and Subsidiary Legislation 549.58, the Regulations on substances depleting the ozone Layer, together with Regulation (EU) No 517/14 on fluorinated greenhouse gases and repealing Regulation (EC) No. 842/06. In instances where such substances are utilised in foam and insulation panels, the waste gas shall be treated as hazardous waste and any foam containing components needs to be disposed of at specialised facilities where possible ODS/ F gas can be extracted prior to disposal.
- 3.2.2.16 Drainage of the refrigeration cooling system shall be undertaken in a manner that results in the removal of 99% of the oil and refrigerant from the cooling circuit and compressor being collected and stored in a sealed container.
- 3.2.2.17 Upon removal of waste compressor oil from the cooling system it shall be placed immediately in a suitable sealed container to prevent fugitive loss of controlled substances.
- 3.2.2.18 Following the drainage of the cooling system the compressor unit shall be removed from the refrigerator unit and placed into a sealed container.
- 3.2.2.19 The operator shall strictly adhere to the works method statement as submitted to the Authority as part of the application and variation processes. Any change in this works method statement shall be subject to an application for a variation of the permit.
- 3.2.2.20 Processing as per conditions 3.2.2.16 – 3.2.2.19 shall be undertaken in a manner to ensure fugitive emissions from the degassing of the refrigeration cooling system are collected.
- 3.2.2.21 Waste oils collected from WEEE received on site, must be stored and treated according to oil type. No mixing of different oils is permitted at any stage of the process (i.e. prior to filtering, within the machinery, or following removal from machinery for reuse, resale or disposal).
- 3.2.2.22 At least one (1) suitable work station for dismantling of WEEE must be set up, equipped with the necessary tools and proper component segregation bins.

## **4. Site Management**

### **4.1 Staff obligations and Responsibilities**

- 4.1.1 All employees authorised by the Permit Holder to undertake the waste management activities on his/her behalf, shall be fully conversant with the obligations of this permit and shall be individually aware of their responsibilities and liabilities in observing the conditions of this permit. They shall be provided with adequate professional technical development and training and written operating instructions to enable them to effectively carry out duties.
- 4.1.2 One member of the staff shall be nominated as the Technically Competent Person (TCP) of the site, whereby this person is to physically represent the Permit Holder during the times when the Permit Holder will not be available.

- 4.1.3 The TCP is responsible for the implementation of all the obligations stipulated in this permit, must supervise the rest of the staff on site and is completely responsible to ascertain that all permit conditions are being adhered to and that unauthorised waste does not enter the site.
- 4.1.4 In the event of any short or long periods of sick leave or vacation leave taken by the TCP, for a period exceeding 10 days, the Permit Holder is obliged to find a replacement for that member of staff without delay.
- 4.1.5 All the staff on site shall be fully aware of the procedures to be taken to contain any environmental hazard, which may arise related to the activities being carried out on site.

## **4.2 Accident Prevention and Control**

- 4.2.1 The submitted Emergency Response Plan shall be maintained containing details of the location, nature and quantity of chemicals, oils and fuels stored, any special hazards, a drawing showing location of drains and the emergency phone numbers of the operator and relevant authorities. It shall also include actions to be taken in the case of incidents which could affect the environment, such as fires and chemical/fuel spills. The emergency plan shall indicate that accidental releases of chemicals and fires caused by chemicals are to be managed as specified in the respective MSDS sheets.
- 4.2.2 In the case of an accident (including fire, chemical spills, etc.), the Operator shall follow the Emergency Response Plan referred to in Condition 4.2.1 and, in the case that such accident could be regarded as causing environmental damage or as posing a threat of environmental damage, the Operator shall notify the Authority and CPD within 24 hours.

## **4.3 Site Records & Archive**

- 4.3.1 A site daily operations log shall be kept on site in which the following information shall be recorded on a daily basis:
  - (a) Total amount of waste in kilos accepted on site
  - (b) Total amount of waste in kilos removed from site for disposal or further treatment
  - (c) Total amount of waste in kilos refused entry on site
  - (d) Total amount in kilos of unaccepted material sent to the quarantine area and by which registered waste carrier it was transported
  - (e) Copies of consignment notes used for waste received/removed from site
  - (f) Any incidents that took place on site such as mechanical faults in the machinery or equipment used on site, any spills, fires, etc and the remedial action taken
  - (f) Names of visitors to the site
  - (g) Any other incidents that the Permit Holder deems important to record.

Each record shall be compiled within 24 hours of the relevant event. The records kept in the site operations log shall be made available for inspection at any time when the Authority representatives request to inspect them.

- 4.3.2 The Operator shall ensure that all records required to be made by this Permit and any other records made by it in relation to the operation of the Permitted Installation shall:
  - (a) be made available for inspection by the Authority upon request;
  - (b) be supplied to the Authority on demand and without charge and in the format requested;
  - (c) be legible;

- (d) indicate any amendments which have been made and shall include the original record wherever possible; and
- (e) be retained at the Permitted Installation, or other location agreed by the Authority in writing, for a minimum period of 3 years from the date when the records were made, unless otherwise agreed in writing.

4.3.3 The Operator shall maintain a record of the skills and training requirements for all staff whose tasks in relation to the Permitted Installation may have an impact on the environment and shall keep records of all relevant training.

#### **4.4 Closure and Decommissioning**

4.4.1 In the event of cessation of business activity on the site, all wastes (including machinery, tanks, equipment) and hazardous materials must be removed from the site such that any pollution risk is avoided and the site is returned to a satisfactory state. The Operator shall notify the Authority at least three months prior to taking action, and shall submit a decommissioning plan to the Authority for approval. The Authority's approval is required prior to the commencement of the decommissioning works.

4.4.2 When deemed necessary the Authority may require the permit holder to take such additional measures as it considers necessary with respect to after care obligations in relation, but not limited to the remedial action, rehabilitation, and monitoring of the waste management or waste production site.

4.4.3 A finalised version of the Decommissioning Plan shall be submitted to the Authority for approval not later than 10 days after the Authority is notified of the intention to decommission the site.

4.4.4 The approved Decommissioning Plan shall be implemented within 12 months of final cessation or decommissioning of the Permitted activities or part thereof or according to a timeframe as may be agreed with the Authority.

#### **4.5 Reporting**

4.5.1 The Operator shall submit to the Authority an Annual Environmental Report (AER) of the previous year by not later than end of March of each year, providing the information listed in Schedule 3 of this Permit and in the format specified therein.

4.5.2 An independent auditor shall be engaged by the Operator to certify all of the waste reporting required by this permit, in line with the Audit Procedures - Terms of Reference found in Schedule 4 of this permit. The Authority may carry out any such audits on the installation itself as deemed necessary at the expense of the Operator in line with condition 1.3.19.

4.5.3 In the event where operations cease temporarily, the TCP or Permit Holder are obliged to notify the Authority within two (2) days and are also to inform the Authority with regards to when the works are intended to resume.

## Schedule 1

### List of Incoming Permitted Waste on Site

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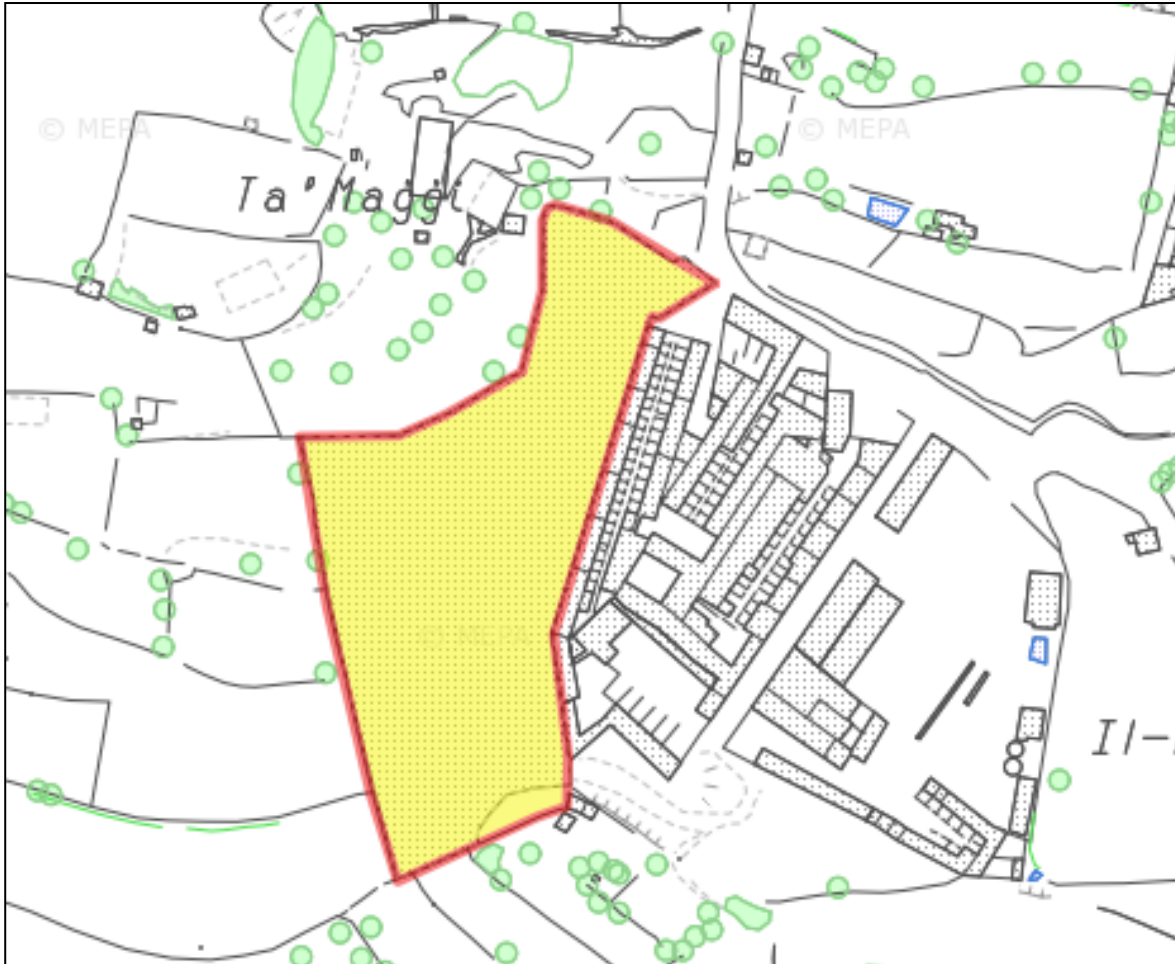
08 03 17*	waste printing toner containing dangerous substances
15 01 01	paper and cardboard packaging
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 15*	hazardous components removed from discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06 01*	lead batteries
16 06 02*	NI-CD batteries
20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

**N.B: Incoming wastes may also leave the site as Outgoing Waste (including separate fractions resulting from permitted processes on site), except where it is otherwise explicitly specified in the permit.**

## Schedule 2

### Site Map

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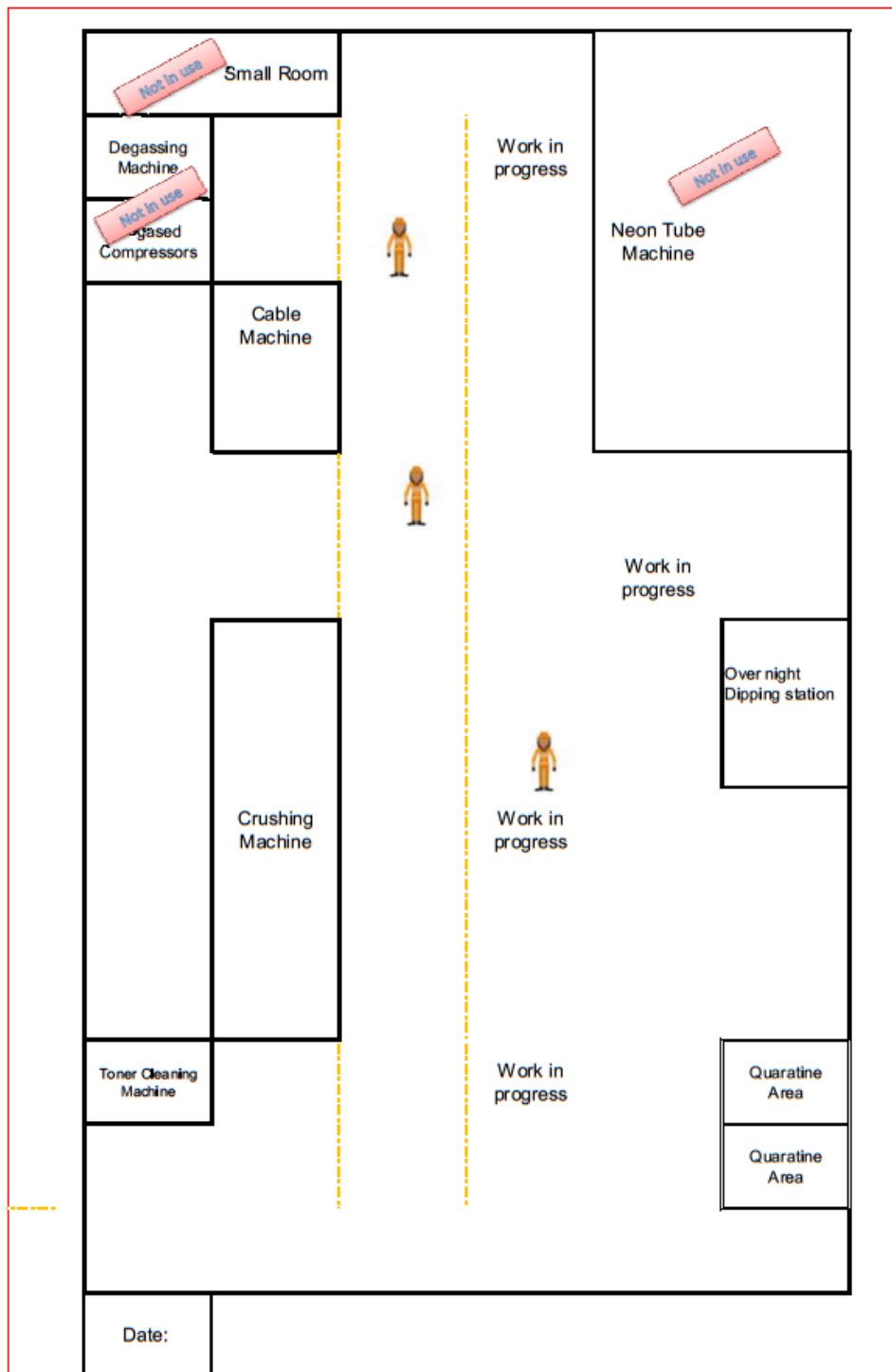
**Fig. 2.1: Site showing extent of industrial complex in red for the carrying out of the activities specified in condition 1.1.1. The extent of the site boundary is indicative and should not be used for interpretation purposes.**



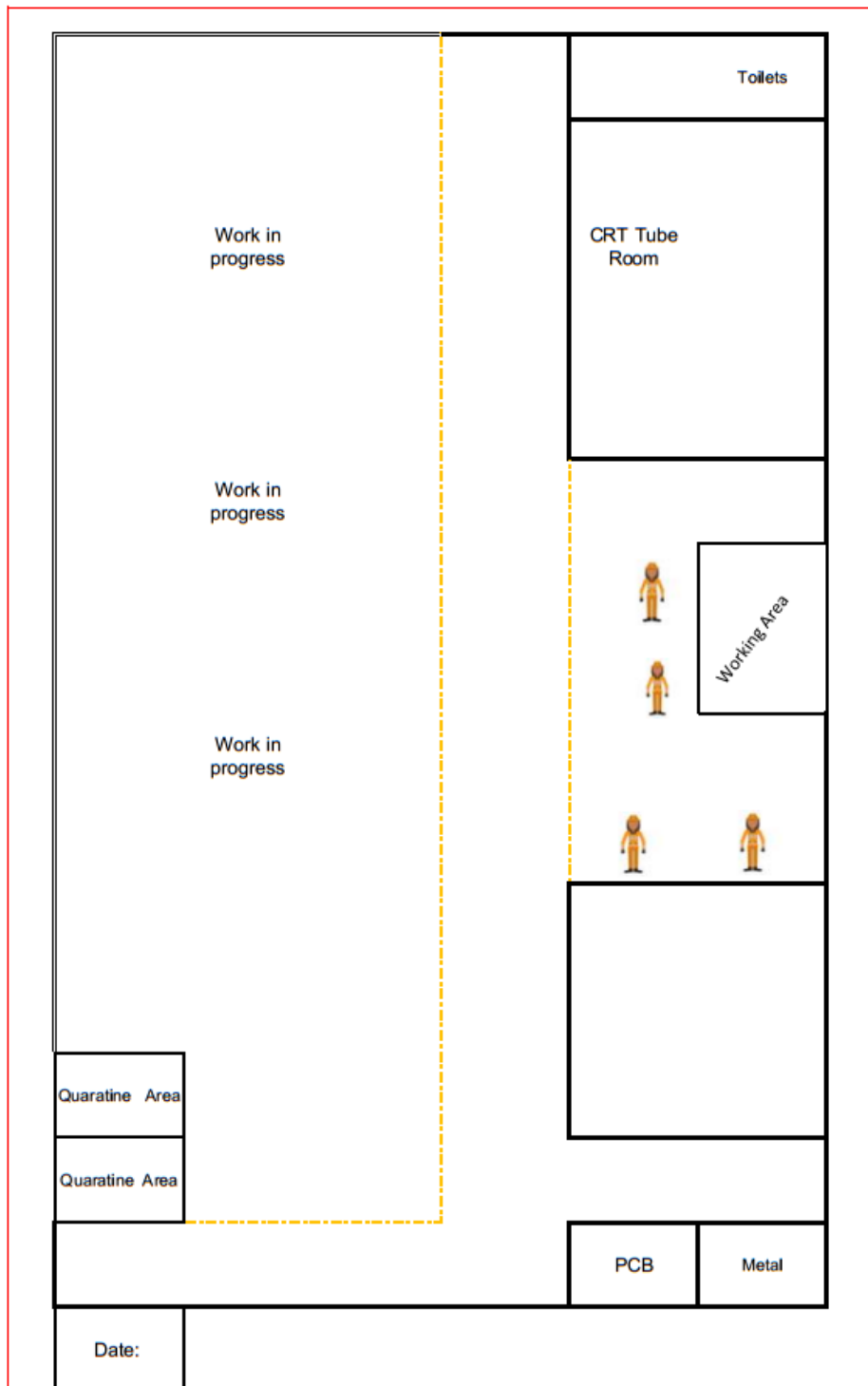


**Fig. 2.2: Site Layout showing permitted units for Electronic Products Ltd. operations in red, for the carrying out of the activities specified in condition 1.1.1. The extent of the site boundary is indicative and should not be used for interpretation purposes.**





**Fig 2.4: Internal site layout plan of garage 28 for the carrying out of the activities specified in condition 1.1.1. The extent of the site boundary is indicative and should not be used for interpretation purposes.**



**Fig 2.5: Internal Site layout plan of garage 29 for the carrying out of the activities specified in condition 1.1.1. The extent of the site boundary is indicative and should not be used for interpretation purposes.**

**Schedule 3****Annual Environment Report and Submissions****Important note**

By this submission, you confirm that you give your explicit consent for the entire contents of this Annual Environment Report to be made available on the Authority's public website.

**S3.1 Introduction**

Environmental Permit Number	
Reporting Year (Calendar Year: 1 January to 31 December)	
Name and locality of Site	
Brief description of activities at the site	

**S3.2 Waste Records**

As per condition 4.5.1 the Operator shall submit to the Authority information on waste records of the previous year by not later than end of March of each year, providing the information listed in the ERA website and in the format specified therein (<http://era.org.mt/en/Pages/Waste-Management-Reporting-Templates.aspx>).

**S3.3 Submission of Certifications**

Condition Number	Documentation
1.5.1	Submission of improvement programme
4.5.1	Submission of Waste records every year
4.5.2	Submission of Audit Report every year

**Applicant's declaration**

*I declare that, to the best of my knowledge, all the above information is correct and substantiated.*

.....  
**Name**  
*(in block letters)*

.....  
**ID Card Number**

.....  
**on behalf of / in my own name**  
*(in block letters)*

.....  
**Signature**

.....  
**Date**

## **Schedule 4**

### **Terms of Reference for Compliance Audits related to Annual Reporting for Authorised Waste Facilities**

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- S4.1 The auditor shall be independent (i.e. an auditor who would be eligible for appointment as company auditor), certified, and approved by the Authority. The auditor shall have access to in-house environmental expertise or otherwise appoint a consultant having environmental expertise to assist him.
- S4.2 The auditor would be required to certify all the information reported to the Authority by the Authorised Waste Facility as specified in the ERA permit itself.
- S4.3 A sound auditing procedure for traceability, monitoring, and control shall be in place for all the authorised waste managed on site in relation to the Waste Management permit or an Environmental permit.
- S4.4 The audit trail shall cover all waste from the point of acceptance of waste into the facility to the end recovery or disposal facility (local or foreign).
- S4.5 Proper records and documentation shall be kept where authorised waste are sent to duly authorised interim storage facilities, pending transfer to an authorised end disposal/recovery facilities. In such cases, proof is to be provided, as regards to that the authorised waste has been transferred to an authorised end disposal/recovery facility within a maximum of twelve (12) calendar months from the end of the annual reporting period.

The points overleaf shall be covered by the auditors in such audits, providing a detailed report of their findings. The Authority may request clarifications and further information from the auditors other than that provided in the audit report.

#	Nature and extent of audit procedures	Timing	Done by and date	W/P ref
1	<p><b>Objective: To confirm that there is a signed receipt for every waste transfer received at the site</b></p> <ul style="list-style-type: none"> <li>Choose a random sample of 10% of the signed receipts for every waste transfer received at the site for each quarter within the calendar year and confirm that all waste entries are covered by an issued signed receipt.</li> </ul>			
2	<p><b>Objective: To ensure that an adequate audit trail is maintained to ensure that when a particular waste stream is being treated it can be traced back to its waste generator</b></p> <ul style="list-style-type: none"> <li>Choose a random sample of 10% of the total waste being treated and ensure that its origin can be traced back.</li> </ul>			
3	<p><b>Objective: To confirm that any hazardous waste movements from the site (entry &amp; exit) are covered with a hazardous waste consignment permit and consignment note</b></p> <ul style="list-style-type: none"> <li>In cases of movement within the island of Malta, choose a random sample of 10% of the total no. of hazardous waste movements into and out of the site and confirm that all such movements are covered by a valid hazardous waste consignment permit and a waste consignment note. Confirm also that the relevant EWC code has been used.</li> </ul>			
4	<p><b>Objective: To confirm that any hazardous waste movements from the site (entry &amp; exit) are covered with relevant TFS documentation of the Waste Shipments Regulation in cases of export</b></p> <ul style="list-style-type: none"> <li>In cases of export, choose a random sample of 10% of the total no. of hazardous waste movements out of the site and the relevant TFS movement forms and confirm that all such movements are covered by valid relevant documentation. Confirm also that the relevant EWC code has been used.</li> <li>In the case of waste broker usage, ensure that the waste brokers used are registered with ERA as such.</li> </ul>			

5	<p><b>Objective: To confirm that any movement of non-hazardous waste movements from the site being sent for treatment abroad are covered by the relevant Annex VII documentation of the Waste Shipments Regulation in cases of export</b></p> <ul style="list-style-type: none"> <li>Choose a random sample of 10% of the total no. of non-hazardous waste movements into and out of the site are covered by valid relevant documentation and/or records. Confirm also that the relevant EWC code has been used.</li> <li>In the case of waste broker usage, ensure that the waste brokers used are registered with ERA as such.</li> </ul>			
6	<p><b>Objective: To verify whether the quantities reported by the Waste Facility make reasonable sense</b></p> <ul style="list-style-type: none"> <li>Choose a random sample of 10% of the total amount of waste being handled at the facility and confirm that all waste entries (in and out of the site) reported are verified by relative documentation and/or records.</li> </ul>			
7	<p><b>Objective: To ensure that the waste vehicles used by the authorised facility to transfer the waste to other permitted sites are registered with ERA</b></p> <ul style="list-style-type: none"> <li>Obtain a list of approved waste carriers from ERA and confirm that the ones used by facility are registered with ERA.</li> </ul>			
8	<p><b>Objective: To ensure that, in cases where waste is transferred from the facility to other waste management facilities, locally or abroad, the waste management facilities used would either be approved by ERA or the Competent Authority of the Country of Destination</b></p> <ul style="list-style-type: none"> <li>Obtain a list of locally approved waste management facilities from ERA and confirm that the ones used by the facility are approved and authorised by ERA. Obtain a copy of the permits of any foreign authorised waste management facilities which have been utilised. An original copy of the permit and an approved translated version of the permit is to be presented to ERA.</li> </ul>			
9	<p><b>Objective: To ensure that the declared quantities of waste exported during the previous calendar year were actually received at the authorised facilities and declared to ERA</b></p> <ul style="list-style-type: none"> <li>Obtain all certificates received from recycling facilities and confirm that these have all been declared to ERA prior to shipment</li> <li>Confirm arithmetical correctness of all reported data in this regard.</li> </ul>			



<b>10</b>	<b>Objective: To identify the waste being treated both locally and abroad, and ensure that it has been recovered appropriately</b> <ul style="list-style-type: none"><li>• Ensure that all relevant documentation, including but not limited to, the hazardous waste consignment permit and consignment note applications, are available in case of local treatment.</li><li>• Identify the materials exported according to the EWC Code and review actual documentation (including bills of lading) confirming an audit trail showing that the waste has been sent to a recovery facility as per permit requirements.</li></ul>			
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**END OF PERMIT**