

Meeting	EIA Public Consultation in relation to the following proposal: PA 03012/20 – EA 00057/18: The outline application for the construction of a Waste to Energy Plant at Maghtab - Site at, Maghtab Land Fill Complex, Il-Maghtab, Naxxar.
Date	16 th December 2020
Duration	17.00hrs – 18.20hrs
Location	Hexagon House, Spencer Hill, Marsa
ERA representatives	Mr. Kevin Mercieca, Ms. Josianne Abela Vassallo, Ms. Leonora D’Amato
Minutes taken by	Ms. Marie Therese Vella (ERA)

Mr Kevin Mercieca opened the online meeting giving details about the proposed development which is currently subject to an Environmental Impact Assessment (PA 03012/20 – EA 00057/18: The outline application for the construction of a Waste to Energy Plant at Maghtab - Site at, Maghtab Land Fill Complex, Il-Maghtab, Naxxar).

Details vis-à-vis the purpose of the meeting were provided, in particular that the meeting was part of the EIA process. It was also clarified that this was not the decision-taking meeting but was being held to present the EIA findings and to gather feedback from the public in due time for any relevant considerations to be factored in during the process.

The public was also informed that proceedings shall be recorded and that comments can be put forward in an anonymous manner. There were no objections for the online meeting to be held in English, so the chair introduced the attendees present in ERA’s boardroom. Representatives from ERA, AIS and Wasteserv Malta were present.

Ing. Mario Schembri on behalf of AIS delivered a presentation explaining the studies carried out as part of the EIA.

Mr Kevin Mercieca remarked that no decisions will be taken and opened the floor for comments after the presentation.

Mr Denis Zammit Cutajar

As we heard from the presentation one very glaring admission is that this facility will have a huge visual impact. What are the measures that are being considered in order to mitigate this very serious impact? And secondly what study has been undertaken to align the size and capacity of this huge monster to our national needs. I recently read an article claiming that it is massively over our needs and more importantly will discourage people from recycling. I would like to have your comments about this as well.

Tony O'Reilly

What other locations were considered within the complex and what about the loss of visual amenity?

Sean Bradshaw

Were any other locations in Malta considered? Given the prevailing wind is from the NW any pollutants blow on land as opposed to offshore if other alternative locations possibly in unused and abandoned quarries in the south. Which would limit the visual impact if in a quarry.

Perit Carmel Cacopardo

I have already submitted my comments in writing when the public consultation commenced. I would like to underline a couple of points. Firstly, there is an issue of conflict of interest of the coordinator of the EIA. The coordinator of the EIA has a contractual relationship with Wasteserv and as such he cannot be neither independent nor impartial. Secondly one of the authors of the studies, Professor Alan Deidun is a member of the board of ERA and he will be expected to sit in decision on this matter in particular when the ERA board considers the application for the IPCC permits, which will also make use of this EIA. The additional point I want to make is that the EIA quotes from two studies relative to the analysis of alternative site selection. But these studies are not available for public scrutiny.

Mr. Kevin Mercieca (ERA)

We note that Perit Cacopardo has submitted written comments. We note your issues and we are at the moment working on addressing them. Obviously we will be considering your comments with their due importance. ERA will ensure that the EIA process is carried out in line with the requirements of the applicable regulations.

Ing. Mario Schembri (AIS Environment)

I will start with the interventions by Mr. Denis Zammit Cutajar. The first one related to the mitigation measures that would be taken in terms of division to reduce the visual impact and the second one is about the justification for the size and quantity of the incinerator facility. Starting from the second, which makes more sense since the size is a direct result of the size of the requirement. The NSO has just published the waste arising in terms of municipal solid waste for 2019 and the amount of waste that has been generated is 350,000 of which 320,000 have been sent to landfill. With the remainder some 30,000 being recycled or not ending up in the landfill, either through reuse or waste recovery. The facility as proposed has the maximum full capacity of some 200,000 municipal waste per year and it is divided into two, so it can operate one line at a maximum capacity of 100,000 tons and the other one 100,000 tons, combined they make 200,000 tons. As you can see from the current generation of 350,000 there is a shortfall already of 150,000 tons and given that we are currently only recycling 30,000 tons, there needs to be, between today and the day that the facility is commissioned, a fivefold increase in the amount of waste we currently recycle and that is assuming that the facility is operating at its full capacity all of the time. In reality the facility can operate at half capacity with just one line and that one line can also not operate at its full capacity. This means that the facility is not preventing from the policies to kick in for waste minimization, and neither for the need to recycle because the facility is not large enough and sufficient enough to avoid that there will be no recycling whatsoever.

In fact this plant has been sized in order to provide a substitute for landfilling when Malta is actually preventing waste at its maximum. That is how the designers have addressed this situation of where we are today, and where we need to be. So I believe, that addresses your concern of whether the facility has been over-specified or is too large and beyond the requirements. In fact it is arguably already small of what the demand is required as of today because in order for Malta's waste management not to have some very serious problems, the current recycling rate needs to increase fivefold.

As to the resulting size of the facility, yes it is large, it is huge, in fact in the EIA, we have been very clear that this is a major visual impact. Nevertheless, the designers have gone to great length to design a pleasing facility which appears to visually align with the ground formation with its use of colors and materials. In fact the canopy which encapsulates most of the facility is glulam. It is a kind of timber with warm, earth colors and it has been designed to minimize the sharp edges and the harshness of the bulkiness of the facility, although you cannot make it disappear. Of course it will be visible and hence it will be a major permanent negative impact in terms of visual assessment.

Moving on to the other intervention made by Perit Carmel Cacopardo regarding the conflict of interest, as he well knows, the coordinator and the consultants working on these projects sign a declaration of no conflict of interest. I stand by that document that I have signed and I have no conflict of interest in this particular development, and therefore I do not agree with me carrying out the coordination of this environmental impact assessment bear any conflict of interest to the proposed development. The fact that I am an expert in the field and that I am operating at various level in the industry doesn't mean that I have a conflict of interest. The conflict of interest simply arises in the way that I would be biased in my opinion. My opinion is based on reason, on logic and therefore I see that I carry no conflict of interest in this instance.

Moving to the other point regarding the alternative site assessments, yes the EIA quotes two reports, one of them is the SLR report of 2015 which considered eight different possible site locations for the development of the waste to energy facility which included Marsa, Xghajra, Marsascala, Hal-Far, Delimara, Luqa and Maghtab. The conclusion from the 2015 report was that Maghtab is the ideal location, given the synergy that exist with the other operations that are ongoing in the area. Located centrally, would balance transportation from all areas of the island and being close to the sea was also considered, to give the required cooling to the facility. In 2019 another alternative site assessment study was carried out and a report was produced thereof, which considered a further four different sites within the Maghtab area and the one on which the EIA further progressed was identified through the alternative site assessment as being the preferred location. The fact that these reports are not in the public domain is beyond my competence and is something which the ERA has to resolve. I've been informed that these will be uploaded in the public domain, my impression was that these were already online.

Mr Kevin Mercieca (ERA)

Regarding the Alternative Sites Assessment reports, I can clarify that the ERA has already requested these reports together with the clarifications as part of the normal procedure when reviewing the EIA report and we are expecting their submission.

Mr Denis Zammit Cutajar

The visual impact by the report's own admittance is huge and the mitigation measures included in the report are not sufficient. I would like to hear whether there are going to be additional measures taken to reduce the visual impact?

My other question is, I seem to be misinformed but according to my sources, the waste is going to reach 300,000 tons in 2035, but I will have to check my sources and refer back to the NSO study that Engineer Schembri is referring to.

Mr Richard Bilocca (Wasteserv).

We need to keep in mind that the visuals that are presented are based on an outline development permit. This is already very detailed and it already shows our commitment to put the best possible design from an architectural point of view, and I can confirm that the designs that are available will continue to be improved, as part of the procurement process should this facility get the green light. So I can confirm that we, as Wasteserv are very committed to how the plant will look. And we are devoting quite a lot of resources to the visual aspect of this project.

Perit Carmel Cacopardo

As you are aware, one of the major issues of controversy is the siting of the plant. In view of the fact that the public consultation could not be carried out on the justification of the siting, that is on the Alternative Site Assessment reports, I presume that you would consider reopening the public consultation when the documents are available.

Mr Kevin Mercieca (ERA)

I can't give a reply now, but your request will be definitely considered. We will get back to you regarding this issue, whilst I hereby confirm that when we have the documents we will make them available to the public.

Perit Carmel Cacopardo

The fact that you are accepting that these have not been made available so far, and this is an issue of major importance in the public consultation, it is essential that the public consultation should also be carried out on the justification for the siting. And this public consultation has so far not been carried out.

Mr Kevin Mercieca (ERA)

Since you also requested this directly to us, we will be contacting you directly about the outcome of this decision.

Mr Kevin Mercieca closed the meeting by confirming that the points raised have been recorded and noted. He also thanked the participants and invited them to send any further comments, preferably by email to eia.malta@era.org.mt, or by post to 'The Director, Environment and Resources Authority, Hexagon House, Spencer Hill, Marsa', by 23rd December, 2020.