

Environmental Impact Assessment

Screening

(According to Schedule IB of S.L. 549.46, as amended)

PA file no.:

Other reference: EA 00032/17

Project Title: Construction of factory for the production of APIs

Location: Factory HF 51 & HF 53, Qasam Industrijali, Ħal Far

Screening date: October 2017

1. Description of Proposal

1.1 Outline of project/development

This is a development application for the construction of a new factory for the manufacturing of Active Pharmaceutical Ingredients (APIs) with an adjoining parking area at Area HF 53, Qasam Industrijali, Ħal Far. This will also seek to double the capacity of an existing API-production factory located in between the two plots earmarked for development, permitted by virtue of PA 04236/08 (See Figure 2.); the original application was subject to an EIS which was certified by the then MEPA in 2014. An IPPC permit for the said operations was issued in 2014. Furthermore, both the extension to the external area and carpark (DN/00023/17), as well as the construction of the factory (DN/00810/17) were approved through the DNO application process.

The site is separated into three sections (See Figure 2):

- **Site A:** Technical Area (including warehouses, LPG tanks, emergency generator, 360m² car park, and green area)
- **Site B:** Current Factory (PA 04236/08)
- **Site C:** New Factory (details below)

The new factory's processes will be nearly identical to the original, will produce the same APIs and contain the following structures: administrative facilities such as offices, kitchenette, and employee restrooms, Quality Control lab, Process Control Lab, warehouse, maintenance workshop, and production area.

1.2 Site description and related considerations

The Ħal-Far Industrial Area, classified as such by the South Malta Local Plan, (SMHF 01) is characterised by industrial activity with Wied Zhuber Valley and the Ħal-Far cliffs towards the South of the development site. The total site area of the proposal is about 4,500m².

Furthermore, the site lies c. 50 metres from:

- (i) the Mellieha to Birzebbugia Coastal Cliffs, designated as an Area of High Landscape Value & Area of Ecological Importance (G.N. 400 of 1996),
- (ii) Special Protected Area of Rđumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Benghisa (MT 0000033); and;
- (iii) Special Protected Area of Conservation of International Importance of Rđumijiet ta' Malta: Ir-Ramla ta' Cirkewwa sa Il-Ponta ta' Benghisa (MT 0000024).

Figures 1 - 4 below indicate the location and plans of the proposed development.



Figure 1: Location of the sites earmarked for the proposed factory (Source: PA Geoserver)



Figure 2: Close-up of the sites and its immediate surroundings (Source: PDS)

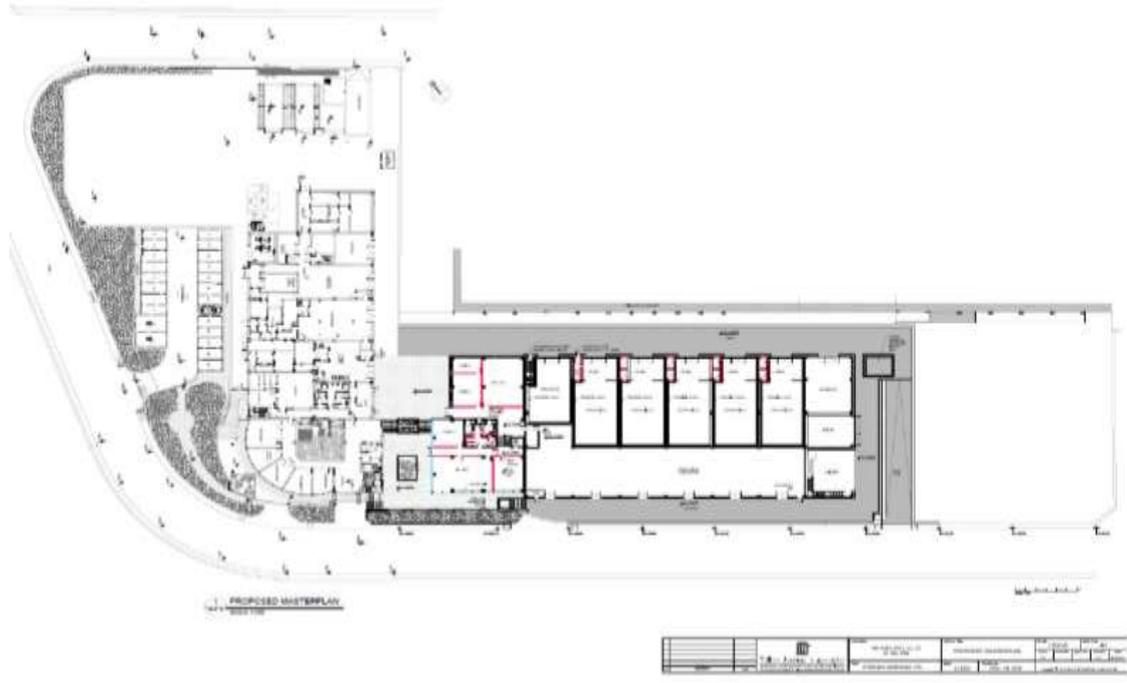


Figure 3: Proposed Plans (Source: PDS)



Figure 4: View into the site (Source: PDS)

2. Overall Environmental Assessment

2.1 Environmental Impact Assessment Screening (citations refer to S.L. 549.46, as amended, except where otherwise specified):

With respect to the current application, at pre-submission stage, the proposed development was to fall under Schedule IA, Category 10(a) of the EIA Regulations, 2007 (S.L. 549.46): *Any change or extension of development which would result in the development listed in Category I and II, already authorised, executed or in the process of being executed, which may have significant adverse effects on the environment including:(a) an increase in size greater than 25%.* Thus the submission of a Project Description Statement (PDS) was required.

The previous application for the construction of the original factory (PA 04236/08) was subject to an EIS due to its classification under Schedule IA, Category II Section 8.3.1.1(v) of the EIA Regulations, 2007 (S.L. 549.46): *Construction of an integrated chemical installation, i.e. an installation for the manufacture on an industrial scale of substances using chemical conversion or physical processes, in which several units are juxtaposed and are functionally linked to one another and which are: (v) for the production of basic pharmaceutical products using a chemical or biological process.* This was certified by the then MEPA in 2014.

2.2 Appropriate Assessment Screening

The proposal is close to Wied Zhuber and the Hal-Far cliffs, which are protected as part of the coastal cliffs of Malta. Specifically the areas under protection are:

- (i) Special Protected Area of Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Benghisa (MT 0000033); and;
- (ii) Special Protected Area of Conservation of International Importance of Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa (MT 0000024).

The proposal lies within already committed land and the already existing factory has operated for years without any incident. In this regard, as long as no overspills are allowed into the valley, no significant impacts are expected.

No further assessment is required as per regulation 19 of Subsidiary legislation 504.73, Legal Notice 113 of 2006 as amended.

2.3 Version of documents used for screening:

1. PDS dated 11th October 2017.

3. Screening Matrix

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
1	Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, landuse, changes in water bodies, etc)?	<p>No.</p> <p>The proposal lies within the Hal Far Industrial Estate earmarked for industrial development.</p> <p>Furthermore, both Sites A and C have been disturbed in some way (see Figure 4).</p> <p>Site A has been reclaimed by Sterling Chemicals due to the presence of liquid discharges of unknown origin. Site C is generally disturbed land with some vegetation on site (3 Carob trees, 1 Fig tree, and 1 Tamarisk).</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No.</p> <p>Although c. 4,500m² of land will be committed to industrial activity, the site is an infill site, is already designated for such land use and is also located on disturbed land. Furthermore, the trees on Site C will be transplanted into the green area on Site A, thus becoming incorporated within the landscaping.</p> <p>Thus, no significant impacts are expected.</p>	PDS Pg. 33
2	Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any	<p>Yes.</p> <p>The proposal will take up 4,500m² of land which is already designated for industrial development.</p> <p>Construction, including</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>During construction, the scale of the proposal and the use of resources is such that it is not likely to have a significant effect on the environment.</p> <p>Although the proposal seeks to double the</p>	PDS Pg. 50-52

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
	resources which are non-renewable or in short supply?	<p>excavation and site preparation will make use of cement, aggregates, water, concretes, and other miscellaneous construction materials.</p> <p>Operationally, the factory will make use of solvents, raw materials, and catalysts for the production of APIs. Energy and water will also be used for the general functioning of the facility. A rainwater reservoir of 630m³ will also be constructed for use in irrigation of the green area on Site A and emergency water use.</p>	capacity of the already existing facility, and thus double the resources used, it is unlikely that the use of such resources for this individual project <i>per se</i> will have a significant impact.	
3	Will the Project involve use, storage, transport, handling or production of substances or materials or energy, especially any resources which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	<p>Yes.</p> <p>Dust emissions may occur during the excavation and construction phases, together with other emissions that would be generated by machinery during construction.</p> <p>Operationally, the factory will make use of solvents, raw materials, and catalysts for the production of APIs. This is expected to produce a number of hazardous waste streams, including the presence of chromium, beryllium, nickel, and copper compounds. The total hazardous waste produced will double from 990 to about 1860 tonnes.</p> <p>There will also be a minor increase in operational traffic which may have an impact on air emissions.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No.</p> <p>Potential dust impacts from excavation and construction works are short-term and temporary. Also, any impacts associated with dust generation during the construction phase are not considered to be of major significance, given the amounts of excavations required for the proposal, and as long as the construction phase of the project respects the requirements of the Environmental Management Construction Site Regulations, 2007 (S.L. 552.09).</p> <p>It should be noted that the volumes and hazardous nature of the waste that will be generated are substantial and thus they should be managed in an environmentally sound manner, which implies:</p> <ul style="list-style-type: none"> • A proper identification and separation of the different waste streams at source; • Appropriate waste storage area(s)/tank(s) while pending collection; • To apply the waste hierarchy as set up in the Waste Regulations (S.L. 549.63) considering disposal operations is the last option. <p>The PDS also highlights a number of mitigation measures with regards to operational waste, such as;</p> <ul style="list-style-type: none"> • The use of extractors, filters, and and/or scrubbers; • Adoption of a Management and Control System; • Regular maintenance of machinery 	PDS Pgs. 53-59

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
			<ul style="list-style-type: none"> • Proper, waterproof storage of raw materials and waste • Staff training <p>Should the mitigation measures and required legislation be adhered to, any impacts are unlikely to be significant. This is especially the case when considering the existing factory has operated for a number of years without incident.</p>	
4	Will the Project produce solid wastes during construction, operation or decommissioning ?	<p>Yes.</p> <p>Construction will generate about 100 tonnes of construction waste from packaging, metals concrete, and other miscellaneous construction materials. There will also be about 50 tonnes of excavation waste, and some soil/stones contaminated with hazardous substances.</p> <p>Besides the hazardous wastes described in Question 3, operations will produce various types of solid wastes. This will likely include packaging, plastics, municipal waste, and various solid and liquid production-related non-hazardous wastes. Section 11.2.0.12 of the PDS includes a comprehensive list of all the types of waste that may be generated by operations</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No.</p> <p>The amount of solid waste likely to be produced by the project during construction is not likely to be significant.</p> <p>The proposal qualifies for a variation of the current IPPC permit (IP0001/14/A), which govern the operational handling and monitoring of waste.</p> <p>The PDS also highlights a number of mitigation measures with regards to operational waste, such as;</p> <ul style="list-style-type: none"> • The use of extractors, filters, and and/or scrubbers; • Adoption of a Management and Control System; • Regular maintenance of machinery; • Proper, waterproof storage of raw materials and waste; and • Staff training. <p>Should the mitigation measures and required legislation be adhered to, any impacts are unlikely to be significant. This is especially the case when considering the existing factory has operated for a number of years without incident.</p>	PDS Pgs. 53-59
5	Will the project release pollutants or any hazardous, toxic or noxious substances to air?	<p>Yes.</p> <p>Dust emissions may occur during the excavation and construction phases, together with other emissions that would be generated by machinery during construction.</p> <p>During operations, aerial pollutants, such as sulphur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide and benzene, may be released from</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Potential dust impacts from excavation and construction works are short-term and temporary. Also, any impacts associated with dust generation during the construction phase are not considered to be of major significance, given the amounts of excavations required for the proposal, and as long as the construction phase of the project respects the requirements of the Environmental Management Construction Site Regulations, 2007 (S.L. 552.09).</p>	PDS Pgs. 75-78

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
		<p>faulty processes and/or equipment, or other similar malfunctioning of the facility. Of primary concern are potential spills during storage and handling of materials, as well as during transport to and from the facility.</p> <p>Particulate matter may also be released from the operation of the production line, laboratories, steam generator, and boiler.</p> <p>The project will also contribute to an increase in air pollutants released by the increased transport activity in the area.</p>	<p>Operational malfunctioning is unlikely given that the existing factory has operated for years without incident, and the current proposal seeks to double the existing production. Furthermore, even if such accidents should occur, they would be small scale and temporary in nature.</p> <p>The PDS also highlights a number of mitigation measures with regards to air pollution, such as;</p> <ul style="list-style-type: none"> • The use of extractors, filters, and and/or scrubbers; • Periodic wetting of construction areas; • Regular maintenance of machinery; and • Staff training. <p>Particulate matter emissions will be mitigated through abatement measures and monitored through the IPPC permit procedures. Thus, any potential impacts are considered to be insignificant.</p> <p>Impacts from operational traffic are unlikely to be significant considering the scale of the proposal in relation to the existing related activity on site, and the traffic patterns of the wider landward area.</p>	
6	Will the Project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p>Yes.</p> <p>The proposal will generate noise, vibrations, and light emissions during both construction and operation, all of which are typical of industrial activity. This may negatively impact nearby Natura 2000 sites (Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Benghisa SPA, Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa SAC).</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No significant effects are being envisaged considering the nature of the area (industrial area), and that the proposal seeks to extend the already existing factory.</p> <p>The PDS also highlights a number of mitigation measures with regards to noise and light, such as;</p> <ul style="list-style-type: none"> • Proper shielding and direction of light sources; • Minimisation of light sources; • Use of low dB machinery; • Regular maintenance of machinery; • Limitations on when noisy equipment will be used; • Use of filter sets, absorbent cushions, or phonometric barriers; and • Staff training. 	PDS Pgs. 103-104

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
7	Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	<p>Yes, into both the nearby valley and coastal waters, including (i) the Mellieha to Birzebbugia Coastal Cliffs, an Area of High Landscape Value & Area of Ecological Importance (G.N. 400 of 1996), (ii) the Special Protected Area of Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Benghisa (MT 0000033); and (iii) the Special Protected Area of Conservation of International Importance of Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa (MT 0000024).</p> <p>During construction, dust emissions may release windborne or waterborne particulates into the Wied Żnuber watercourse. In turn, this may lead to contamination of the coastal waters.</p> <p>During operations, waterborne and/or airborne pollutants may be released into the Wied Żnuber watercourse from faulty processes and/or equipment, or other similar malfunctioning of the facility. Of primary concern are potential spills during storage and handling of materials, as well as during transport to and from the facility.</p> <p>According to the information provided in the PDS, there is no perched aquifer beneath the site and the Mean Sea Level aquifer is "thinly developed or not at all".</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No.</p> <p>Construction phase impacts are unlikely to be significant given the nature and scale of the proposal. The implementation of appropriate design and operational measures should suffice for ensuring that there is no contamination of either land or water.</p> <p>The PDS also outlines a number of mitigation measures designed to minimise the impact on Wied Żnuber from dust emissions. For example, through the minimisation of water use on site, proper drainage on site, and the proper storage of raw materials.</p> <p>Operational malfunctioning is unlikely given that the existing factory has operated for years without incident, and the current proposal seeks to double the existing production. Furthermore, even if such accidents should occur, they would be small scale and temporary in nature.</p> <p>The PDS also outlines a number of mitigation measures designed to minimise any impacts through personnel training, emergency stations and procedures, and waterproof flooring. Particulate matter emissions will be mitigated through abatement measures and monitored through the IPPC permit procedures.</p> <p>Thus, any potential impacts are considered to be insignificant.</p>	PDS Pgs. 42, 46-47
8	Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	No increase in the risk of accidents is envisaged, other than 'normal' occupational risks typically associated with proposed development.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant impacts are envisaged during both construction and operation.</p>	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
9	Will the Project result in social changes for example, in demography, traditional lifestyles, employment?	No. The project is not likely to result in significant changes relative to the current baseline, and is therefore not expected to have any such social implications. Furthermore, the project will employ 110 full-time workers in addition to the 40 workers already employed within the existing facility.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant changes are expected.	PDS Pgs. 50
10	Are there any such factors which should be considered such as the consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?	The site and its surroundings are designated as an Industrial Area (SMHF 01) in the South Malta Local Plan.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant changes are expected when considering the nature of the proposal within the surrounding industrial area.	/
11	Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	Yes. The site lies 50m from: (i) the Mellieha to Birzebbugia Coastal Cliffs, an Area of High Landscape Value & Area of Ecological Importance (G.N. 400 of 1996), (ii) the Special Protected Area of Rđumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Benghisa (MT 0000033); and (iii) the Special Protected Area of Conservation of International Importance of Rđumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa (MT 0000024). During construction, dust emissions may release windborne or waterborne particulates into the Wied Źnuber watercourse, which may also lead to contamination of the coastal waters; the protected areas listed above all lie within Wied Źnuber or the adjacent coastal waters. In turn, this may have adverse effects on the biotic components present	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> Reply to Question 7 refers.	PDS Pgs. 95-99

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
		<p>within these zones.</p> <p>During operations, waterborne and/or airborne pollutants may be released into the Wied Žnuber watercourse, thereby impacting any biotic components present, from faulty processes and/or equipment, or other similar malfunctioning of the facility. Of primary concern are potential spills during storage and handling of materials, as well as during transport to and from the facility.</p>		
12	Are there any areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?	Reply to Question 11 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 7 refers.</p>	PDS Pgs. 95-99
13	Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	Reply to Question 11 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 7 refers.</p>	PDS Pgs. 95-99
14	Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Reply to Question 7 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 7 refers.</p>	PDS Pgs. 46-47

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
15	Are there any areas or features of high landscape or scenic value on or around the location which could be effected by the project?	Yes. The site lies 50m from: the Mellieha to Birzebbugia Coastal Cliffs which are designated as an Area of High Landscape Value & an Area of Ecological Importance (G.N. 400 of 1996).	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged since the area is already characterised by industrial activities within an existing industrial area, thus the said uses already impinge on the visual setting of the area.	/
16	Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes. The site forms part of the Hal-Far industrial area. Thus the surrounding routes and facilities are used by the employees of the industries in the area.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant changes are expected when considering the nature of the proposal within the surrounding industrial area, and the addition of 23 parking spaces within Site A.	/
17	Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No such routes are known of.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant changes are expected.	/
18	Is the project in a location where it is likely to be highly visible to many people?	No such areas are known of.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged, especially since the area is already characterised by industrial activities within an existing industrial area, thus the said uses already characterise the visual setting of the area.	/
19	Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	No such areas or features are known of.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant changes are expected.	/
20	Is the project located in a previously undeveloped area where there will be loss of greenfield land?	No. The site forms part of the industrial area of Hal-Far and will be located on disturbed land.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are being envisaged.	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
21	Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	<p>Yes.</p> <p>The site forms part of the Hal-Far industrial area which is characterised by industrial activity.</p> <p>These areas will likely be affected by noise, vibrations, and light emissions during construction.</p> <p>Furthermore, an increase in operational traffic is expected as a result of the proposal.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No significant changes are expected when considering the nature of the proposal within the surrounding industrial area, and the addition of 23 parking spaces within Site A.</p>	/
22	Are there any plans for future land uses on or around the location which could be affected by the project?	<p>Yes.</p> <p>Since the site forms part of the Hal-Far industrial area, it is envisaged that there will be future proposals for similar facilities to be constructed in the vicinity of the proposal.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No significant changes are expected when considering the nature of the proposal within the surrounding industrial area.</p>	/
23	Are there any areas on or around the location which are densely populated or built up, which could be affected by the project?	Reply to Question 21 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 21 refers.</p>	/
24	Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities which could be affected by the project?	No such land uses are present.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No significant impacts are envisaged.</p>	/
25	Are there any areas on or around the location which contain important, high quality or scarce	Refer to questions 7 & 12	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Refer to questions 7 & 12</p>	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
	resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?			
26	Are there any areas on or around the location which have already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No such land uses are present.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged.	/
27	Is the project location susceptible to earthquakes, or subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No. No such events are likely to occur in this area given its location, topography and context.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged.	/

4. EIA Screening Conclusion and recommended way forward

4.1 EIA screening conclusion

The proposal falls within the scope of Schedule IA, Category 10 of the EIA Regulations (S.L. 549.46), however following detailed screening in accordance with Schedule IB of the same Regulations and matrix above, the proposal does not require an EIA in accordance with the same Regulations, given that no significant environmental impacts have been identified.

4.2 Pending Further Submissions (Required pre-development permission)

1. Clarifications

- 1.1 With regards to Site C applicant is clarify whether waste storage facilities will be on site. With regards to the waste storage area in Site A what is the volume of waste and the type of waste to be stored therein?
- 1.2 Kindly provide details as to how all areas (including cleaning rooms etc) where hazardous materials will be handled shall be enclosed in order to minimize potential airborne emissions. A proposal should also be provided on how the operator intends to minimize particulate emissions from these areas including whether any air filtering system will be installed. Clarification is also required as to how the proposal will achieve the same filtration efficiency as for those identified in the current IPPC permit (IP0001/14/A).
- 1.3 With regards to any generators, boilers and associated fuel storage on site, applicant is to provide the location of such equipment on a plan including details as to how it will be ensured that an adequate bunding system (with an impermeable base and walls) is in place. The capacity of the bund shall be a minimum of 110% of the largest tank within the bund or 25% of the total volume of all the tanks within the bund, whichever is greater. All filling and off-take points shall be located within the bund;

2. Changes in plans

- 2.1 With reference to Plan 190-16-050 kindly note that the DN number indicated does not relate to the proposed site.
- 2.2 With regards to any sumps/ reservoirs and related infrastructure kindly provide a cross-sectional diagram showing how:
 - It is constructed in such a manner so as not to allow any leakages or spillages to the surrounding environment;
 - It is appropriately ventilated so as to avoid the accumulation of explosive, toxic or corrosive gasses;
 - the area surrounding the rendered impermeable and the ground laid to fall towards the cesspit/sump/reservoir;

3. Submission of studies/ clearances

- 3.1 The applicant is required to update the land and groundwater risk assessment dated December 2015, so as to take into account any potential contamination which may be presented in the proposed Site A and Site C and determine whether a baseline monitoring is required. With reference to Site A, the applicant shall take into account of "*the liquid discharges of unknown origin*" (as specified on pg33 and pg81 of the PDS) as part of the site history which is to be included within the risk assessment. Should it be determined that land testing is required, this is preferably carried out prior to construction works on site. The applicant should also provide details as to whether the proposed development will extend the mitigation measures identified in the Risk Assessment (Ensure Ltd. 2016) to the proposed area.

4.3 Proposed ERA Conditions.

1. The executable version of this development permit together with the approved plans and the commencement notice shall not be issued until such time that the applicant submits a written acknowledgement from the ERA confirming that an application for a variation to the IPPC permit (IP001/14/A) has been submitted and validated by the ERA. The operation of the site shall not commence until such time that the IPPC permit is granted by ERA.

Should the processing of the IPPC permit require infrastructural modifications to accommodate mitigation measures and or abatement technologies, the applicant is to apply for amendment of this development permit or apply for further development permission.