



Meeting	EIA Public Consultation for EIS in relation to the following development permit application: TRK 159436: Removal of dumped material & construction of industrial unit for the recycling/treatment of weee. HHF 040, Hal-Far, Qasam Industrijali, Birzebbugia, Malta
Date	23th October 2015
Duration	Circa: 17.35 – 19.20 hrs
Location	Soċjeta Filarmonika San Pietru, 12, Ġawhra San Pietru, Triq Birzebbuga, Birzebbuga
EPD representatives	Perit Vincent Cassar (Chairperson); Ms. Josianne Abela Vassallo (EPD); Mr. Mark Sultana (EPD); Ms Pauline Farrugia (EPD)
Minutes taken by	Charmaine Zerafa (EPD)

Perit Vincent Cassar opened the meeting giving details about the proposed development which is currently subject to an Environmental Impact Statement (EIS) (*TRK 159436: Removal of dumped material & construction of industrial unit for the recycling /treatment of weee. HHF 040, Hal-Far, Qasam Industrijali, Birzebbugia, Malta*).

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 EIS findings and to gather feedback from the public in due time for any relevant considerations to be factored in during the process.

Ms. Krista Farrugia (ADI Associates) delivered a presentation explaining the studies carried out as part of the EIS.

Perit Vincent Cassar opened the floor for comments after the presentation.

Mr. Dennis Grech (Birzebbuga Environmental Action Group)

Mr. Grech pointed out that the EIS document prepared by ADI Associates has conflicting statements with regards to the mercury/phosphor vapor emissions. He explained that the EIS document states that it will be difficult for this development to meet the level of emissions required by law but later on in the same document the impact from these emissions is listed as low.

Ms. Krista Farrugia (ADI Associates)

Ms. Farrugia explained that the level of impact from the said emissions is listed as unclear and not low in view that while the EIS document was being compiled the consultants did not have enough information with regards to the filtering systems and other mitigation measures that were going to be used for the said operations.

Mr. Kevin Barun (Mayor, Birżebbuġa Local Council)

With respect to the Terms of Reference, the Local Council proposed that the same Terms of Reference for the EIS are to follow the general lines established in IP 004/12/A. However the actual document refers to guidelines dated 2007, which seem to be outdated compared to those dated 2012.

From a survey carried out by ADI Associates for another project in the area of Ħal Far, it resulted that the noise impact levels on the residential area of Birżebbuġa are already higher than the levels established by the WHO Regulations. This means that any extra decibel of noise would result in a high level of noise impact on the nearby residential area.

Other points of concern for the Local Council are the impact on residents from water run off onto the valley system. Although in the EIS this is listed as low, should this occur the valley system will be contaminated and thus would result in a negative impact on residents. Of concern is also the storage method of hazardous and toxic waste and any potential spillages; water storage on site and the utilisation of said water and the carbon footprint of the plant's operation, including the generation of electricity on site.

It must also be noted that the EIS makes no reference to Corporate Social Responsibility.

Mr. Mark Sultana (MEPA)

The date 2007 refers to the date when the EIA Regulations (LN 114 of 2007) were published. The general guidelines on EIA (Terms of Reference) were issued by MEPA on 13th April 2015 following consultation with the general public (including the Local Council). The number quoted; IP 004/2012 is an IPPC permit reference number and does not relate to EIA.

Mr. Dennis Grech (Birżebbuġa Environmental Action Group)

The proposed development is for the construction of a WEEE facility; thus the crushing of hazardous and electronic waste. However in the EIS document and in the presentation delivered by ADI Associates there is a reference for the crushing of pallets and wood. Also included in the EIS document is a reference for a mobile incinerator, however no details are provided in this respect.

Apart from the above, no information has been provided with regards to the proposed gasification plant and with regards to the type and quality of the filters that shall be used in the culverts within the internal area.

Ms. Krista Farrugia (ADI Associates)

No crushing of wood will take place on site apart from the wood generated from the dismantling of other items. The incinerator was included in the first proposal, however since then the incinerator has been withdrawn.

Mr. Vincent Cassar (MEPA Chairman)

Details with regards to the gasification plant and filters would need to be included in the IPPC application. One has to note that the planning permit is a land use permit and not the operational aspect of a development. MEPA would require the IPPC application to be submitted prior to the issuing of the operational permit.

Mr. Dennis Grech (Birżebbuġa Environmental Action Group)

The proposed mitigation measures include the installation of a type of membrane underneath the hard standing footprint. However according to the proposed plans this type of membrane will not be present under the landscaped area (underneath the soil).

Perit Joseph Grech (o.b.o applicant)

It must be clarified that the material that will be used is not common membrane but a geotextile material. As per proposed plans, this material will be installed underneath all hard standing areas but in our opinion there is no need to also include it underneath the landscaped area. This is because it is of utmost importance that any hazardous material/particles are contained within the plant. External areas were included as a precautionary approach.

Mr. Dennis Grech (Birżebbuġa Environmental Action Group)

The Birżebbuġa Environmental Action Group pointed out that in the immediate area there are several boreholes present including one owned by the applicant himself. One cannot assume that the hazardous metals/particles will be contained within the facility given that it is very easy that operators or anyone visiting the facility could easily transfer the said material to the sole of their shoes. This will result in the contamination of hardstanding areas outside the site. Eventually, when it rains the said material will seep into reservoirs. Any transfer onto the landscaped areas will result in the percolation of heavy metals/particles into the boreholes. It must be noted that should there be a heavy rainfall the reservoirs will overflow and the contaminated water will enter the watercourse/valley system.

According to the proposed plans the landscaping area will include the planting of twenty eight (28) olive trees. Due to the risk of contamination of the said olive trees (as already explained), and the risk of anyone from the public harvesting any of the said olives, the Birżebbuġa Environmental Action Group suggests the planting of alternative trees for landscaping.

A number of underground cesspits are being proposed on site for different uses including the collection of mercury contaminated water. To further minimise the chances of contamination due to spillages or seepages we suggest that a pvc tank is built inside all cesspits to act as a double tank. This will also allow for any required inspections during the operation of said facility.

Mr. John Grech (Birżebbuġa Environmental Action Group)

Mr. Grech enquired whether different sites were taken into consideration and studied for this development.

He also questioned with regards to the fact that MEPA suggested that a civic amenity site is sited outside this development. Birżebbuġa Environmental Action Group is against this proposal being that there is already a civic amenity site in the vicinity, and having unattended skips on site would result in dumping of all kind of waste.

Ms. Rachel Xuereb (ADI Associates)

The applicant has long been looking for an alternative site to that presently at Żabbar. MEPA always advised the applicant to look for a site in an industrial area, and then following agreement with MIP this site was chosen.

Mr. Dennis Grech (Birżebbuġa Environmental Action Group)

It is also being suggested that the incoming hazardous waste is not stored on pallets but is securely stored in a secluded area to avoid tempering by unauthorized persons entering the site.

The proposal includes the processing of cathode ray tubes present in old television sets. Said processing will consist in the breaking of the neck of the said tubes and the preparation of these sets for exportation. We do not understand the reason in breaking such tubes thus increasing the risk of producing hazardous minerals when the product will be exported and no further processing will be carried out in this facility.

Mr. John Grech (Birżebbuġa Environmental Action Group)

In the EIS document it is stated that the residents are far away from the development site. However the studies do not take into consideration the employees of adjoining industrial companies which are only a few meters away from this facility.

We would like to propose a different site for this facility being that in our opinion the chosen site is not adequate. The site where the “fonderija” (where illegally imported material used to be disposed of) used to be would be more appropriate.

Perit Vincent Cassar 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 ejamalta@mepa.org.mt, or by post to ‘The Director, Environment Protection Directorate, MEPA Head Offices, St Francis Ravelin, Floriana’, by Tuesday 20th October 2015.