

**TRK159436 (EA00003/15)**

**REMOVAL OF DUMPED MATERIAL & CONSTRUCTION OF INDUSTRIAL UNIT FOR  
THE RECYCLING /TREATMENT OF WEEE.**

**SITE AT HHF 040, ĦAL-FAR, QASAM INDUSTRIJALI, BIRŻEBBUĠIA, MALTA.**

## **1. INTRODUCTION AND DESCRIPTION OF THE PROPOSED DEVELOPMENT**

The Malta Environment and Planning Authority (MEPA) requested the submission of an Environmental Impact Statement (EIS) for development application TRK 159436 (*Removal of dumped material & construction of industrial unit for the recycling /treatment of WEEE*) at HHF 040, Ħal-Far, Qasam Industrijali, Birżebbuġia, Malta. The application required the submission of an Environmental Impact Statement (EIS) in accordance with Schedule IA, Category I, Section 2.7.1.1 of the Environmental Impact Assessment (EIA) Regulations, 2007 (S.L. 504.79). The EIS was coordinated by Krista Farrugia and Rachel Xuereb for Adi Associates.

### **1.1 DESCRIPTION OF THE PROPOSED DEVELOPMENT**

The EIS assessed a proposal for the construction of a facility for the preparation for recovery of Waste Electrical and Electronic Equipment (WEEE) located within industrial unit HHF 040 towards the eastern boundary of the Ħal Far Industrial Zone in Birżebbuġa. The site currently consists in unused and disturbed land which is covered in construction/demolition waste, overgrown with vegetation. The unit, covering a total site area of about 1,600m<sup>2</sup>, is being proposed by Damian Whitehead obo MIP Ltd., whereas the site will be operated by Electronic Products Ltd.

Electronic Products Ltd has been carrying out its current operations from three garages located at the Ta' Maġġi Industrial Zone in Żabbar which include the receipt of WEEE, separation of components through either manual dismantling or through the use of a small crusher (used for small WEEE fractions) and a cable crusher to separate the metal wiring from the plastic case, thus facilitating recycling. Through this application, the applicant intends to expand its operations to include the use of a fluorescent tube crusher for the processing of fluorescent tubes and lamps, which constitute hazardous waste and which would, therefore, require the installation of an appropriate abatement system for air emissions and waste water. Furthermore, the proposed facility will be capable of storing over 50 tonnes of WEEE, thus qualifying also for an Integrated Pollution and Prevention Control (IPPC) permit in accordance with the Industrial Emissions Directive and, Industrial Emissions (Integrated Pollution Prevention and Control) Regulations, 2013 (Legal Notice 10 of 2013).

In view of the above, the proposal aims to:

- develop a new purpose-built WEEE treatment facility that is equipped with air abatement, surface water management and pollution prevention measures; and
- facilitate Malta's achievement of the minimum WEEE collection rate and WEEE recovery targets set by the Waste Management Plan for the Maltese Islands (2014-2020) and the Waste Management (Electrical and Electronic Equipment) Regulations, 2014 (Legal Notice 204 of 2014).

In summary, operations in the treatment facility will involve the input (and output) of material which is weighed on the weigh bridge. Incoming waste and outgoing materials (following processing) are inspected and sorted for segregated storage in the area marked as day storage (see Figure 3.10, page 25 of the EIS Coordinated Assessment). The proposed facility will also include offices, a kitchenette, toilets (linked to a cesspit), a reservoir (with a capacity of 121 cubic metres, and a small skip where customers can deposit small quantities of waste outside opening hours. The EIS also includes a description of a gasification plant<sup>1</sup> (for treatment of

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<sup>1</sup> The gasification plant consists of a gasifier and a Combined Heat and Power (CHP) plant. The gasifier produces combustible gas (syngas) in a partial combustion process, which is filtered and delivered via pipework to the CHP plant. The CHP plant combusts the syngas; this process operates the plant's motor and generator, producing electricity and

wood) which the applicant intends to introduce in the future (as part of a long-term project), however this will be subject to a separate planning application.

The proposal is mainly intended for the storage and treatment of the following WEEE categories:

- Medium-sized household appliances including microwave ovens, electric fans and electric radiators;
- Small household appliances including toasters, irons, vacuum cleaners and hairdryers;
- IT and telecommunications equipment including computers, servers, photocopiers, mobile phones, printers, and facsimile machines;
- Cathode ray tube (CRT) monitors and liquid crystal displays (LCDs);
- Consumer electronics including DVD players, hi-fi equipment, electric guitars, amplifiers, radios and cameras;
- CRT TVs and flat-panel TVs;
- Fluorescent and neon tubes / lights;
- Electrical and electronic tools including drills, electric saws, sewing machines, lawnmowers, sanders, nail guns, etc;
- Toys, leisure and sports equipment including video game consoles, electronic fitness equipment, electric trains and car racing systems, coin slot machines, etc;
- Medical devices including analysers, imaging and radio therapy equipment;
- Monitoring and control instruments including smoke detectors and thermostats;
- Automatic dispensers including cold drinks and snacks dispensers, and cash machines;
- Batteries (which will be stored then exported); and
- Wood (which will become shredded clean wood waste through the gasification plant to be used for animal bedding or briquettes).

The proposed site - HHF 040 is located in the Ħal Far Industrial Zone within the territory covered by the Marsaxlokk Bay Local Plan (MBLP). The corresponding policies are MBLP – MH01 to MH14, which seek to establish a balance between the leisure uses for which Ħal Far was, for many years known, and the industrial uses which commenced when the Ħal Far airport was transformed into an industrial zone in the early-1980s, which was to be allocated for export-oriented manufacturing.

The proposal is approximately 450 meters away from: (i) an Area of Ecological Importance (AEI) – Rđum miċ-Ċirkewwa sa Bengħajsa (scheduled through Government Notice 400 of 1996); (ii) Rđumijiet ta' Malta Special Area of Conservation (SAC) of International Importance (as per Legal Notice 311 of 2006 and Government Notice 851 of 2010); (iii) an Area of High Landscape Value (AHLV) – Coastal/Cliffs (scheduled through Government Notice 400 of 1996); (iv) Natura 2000 site as per Habitats Directive (92/43/EEC); and (v) Special Protection Area (SPA) – Rđumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Bengħajsa as per Wild Birds Directive (79/409/EEC).

A detailed overview of the planning policies and legislative framework which relate to the proposed development is provided in each relevant section within the EIS Coordinated Assessment.

## **1.2 ALTERNATIVES CONSIDERED**

Alternatives vis-à-vis location and layouts were considered as part of the EIS. The zero option alternative location is the current site at Ta' Maġġi Industrial Zone in Żabbar, which is authorised to carry out WEEE treatment under Environmental Permit number EP 009/10/H, however due to limitations of the site, expansion and upgrading is not possible. Although a number of locations were considered, MEPA has consistently guided the applicant to seek a location in an industrial area and the chosen site is the only site that has been made available to the applicant by the Malta Industrial Parks (MIP).

With regards to the various alternative layout options for the site, the EIS states that 'a number of refinements in the layout and design have resulted in the current' proposal. The present designs include provisions for bunded storage, designated areas for dismantling and treatment, a quarantine area, the storage of all waste under cover in a shed, the installation of an impermeable membrane underlay beneath the entire site, and vinyl flooring for the fluorescent tube crusher room. Additionally, following advice from the Civil Protection Department, changes to the design were carried out by relocating the main building slightly south-eastward

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heat. The CHP plant will have a 10 KVA generator; further details will be provided to MEPA as part of the IPPC application, once the exact model for this plant has been selected.

from that originally proposed in order to ensure that enough space is available for manoeuvring of fire trucks on site in case of a fire. The Civil Protection Department also insisted on the rainwater reservoir to be split into two compartments to ensure there is always at least 40m<sup>3</sup> available for firefighting if needed. An after-hours skip was also included to discourage illegal waste disposal elsewhere. The original proposal also included a mobile incinerator but this element is not being considered further. The site being proposed includes sites earmarked for future expansion.

## **2. EIA CONSULTATION**

### **2.1 EIA SCOPING**

During the scoping stage, the Project Description Statement (PDS) was circulated to the following consultees and was made available for public consultation from 20 January 2015 to 9 February 2015:

- Birżebbuġa Local Council;
- Malta Resources Authority;
- Civil Protection Directorate;
- Transport Malta;
- Environmental Health Directorate;
- Superintendence of Cultural Heritage;
- Environmental NGOs: Din l-Art Hejwa, Birdlife Malta, Nature Trust Malta, Ramblers Association of Malta, Flimkien għal Ambjent Aħjar, Friends of the Earth Malta, Żminijietna, Fondazzjoni Wirt Artna, GAIA Foundation, Light Pollution Awareness Group, Moviment Graffiti, Malta Organic and Agriculture Movement, Malta Water Association, Youth for the Environment, Noise Abatement Society of Malta, Federazzjoni Birżebbuġa, Birżebbuġa Environmental Action Group, Biological Conservation Research Foundation (BICREF), Malta Bat Group, The Malta Ecological Foundation, Environment Commission

The PDS was also circulated for internal review within MEPA.

Comments were received from Transport Malta (e-mail dated 20 January 2015), Malta Resources Authority (e-mail dated 28 January 2015), and Superintendence of Cultural Heritage (e-mail dated 23 February 2015). A scoping meeting with the Birżebbuġa Local Council, government entities and environmental NGOs was also held on 4 February 2015. A copy of the submitted comments and minutes of the scoping meeting are being included as Appendix I and II, respectively to this report.

The final EIS Terms of Reference were issued on 13 April 2015, following various discussions with applicant and architect.

### **2.2 EIA REVIEW**

The draft EIS was submitted to MEPA on 13 July 2015 and was circulated for review to the same consultees consulted during the scoping stage (see Section 2.1 above). The EIS was also circulated for internal review within MEPA.

The consultation period spanned between 15 July 2015 and 17 August 2015. Within the stipulated consultation period, comments were received via e-mail from: the Civil Protection Department (e-mail dated 16 July 2015), the Environmental Health Directorate (e-mail dated 13 August 2015), and the Malta Resources Authority (e-mail dated 14 August 2015).

Comments made by MEPA and its consultees during the review stage were forwarded to the EIA Coordinator, the developer and the architect on 19 August 2015. These comments were addressed by the EIA Coordinator and responses were submitted to MEPA, all of which are included in an Addendum to the EIS Coordinated Assessment Report. Comments received during the consultation period are included in Appendix III to this Report.

### **2.3 EIA CERTIFICATION**

The EIS was certified on 31 August 2015 and was published for a three-week public consultation period, with a deadline for submissions being 29 September 2015. A public hearing was held on 13 October 2015, with a

deadline for comments by 20 October 2015 (Appendix IV). Minutes of the meeting are included as Appendix V to this report. Comments were received from the Birżebbuġa Environmental Action Group (e-mail dated 20 October 2015).

### **3. EIA FINDINGS**

The characteristics of the site, assessment of impacts and mitigation measures were identified in the EIS as follows:

#### **3.1 Geo-environment**

The study was mainly based on desktop surveys in relation to geology, geomorphology, hydrology and hydrogeology of the site as well as core samples taken from within the site boundary. Figure 5.2 (page 71) in the EIS Coordinated Assessment indicates the extent of the geology and geomorphology Area of Influence (AoI), while Figure 5.3 (page 69) within same EIS provides the AoI for the hydrology and hydrogeology.

##### **3.1.1 Geology and Geomorphology**

The EIS notes that the site for the proposed development is located in an area where Lower Globigerina Limestone is the exposed rock formation. Quaternary deposits, which are also known to occur sporadically on the Maltese Islands, were not identified within the Area of Study (AoS).

The Lower Coralline Limestone Formation is extensively exposed in a cutting close to the site, particularly on the slopes of Wied Żnuber and in the sheer cliff face that lines the coastline. The formation exhibits its maximum exposed thickness (over 140m) on the face of the sea-cliff sections south of the site where the exposed section from sea level is about 60m thick.

In terms of structural geology, there are no faults within the AoI and the nearest faults were found at Ta' Wied Fulija. Figure 5.4 (page 81) in the EIS Coordinated Assessment provides the geological map for the site in question.

In order to assess the quality of the stone material, two holes were drilled on site and identified as BH1 and BH2 (refer to Figure 5.3 – page 73 of the EIS Coordinated Assessment). The results indicated that the quality of the stone material at BH1 was of good quality Lower Globigerina Limestone interbedded with beds of il-Mara member passing downward to massive light brown rock of il-Mara member of the Lower Coralline Limestone formation. At BH2 only stiff red clay was recovered.

The geomorphological units that make up the AoI are: (i) the high cliff coastline; (ii) the Ғal Far plain; (iii) Wied Żnuber; (iv) Wied il-Mixta; and (v) karst features.

The EIS also assessed the type of the soil present in the proposed site. Terra Soil (Xagħra series and L-Inglin Complex) is the main type of soil. At the site and the entire Ғal Far Industrial Estate the soil has been mostly disturbed and which disturbance at times almost reaches the cliffs.

##### **3.1.2 Hydrology and hydrogeological features**

There is no perched aquifer beneath the site as there is no impermeable rock layer (such as the Blue Clay Formation) in the rock sequence beneath the site. The site lies within the catchment of Wied il-Mixta, which is a hanging valley and has a catchment area of 1.78m<sup>2</sup>, while that of the development site is very small at 0.07km<sup>2</sup>. The nearest public borehole (Water Services Corporation) tapping the mean sea level aquifer lies at Ғal Far some 1,000m away from the site while a number of private boreholes are also present in the vicinity. The average surface run-off resulting from annual precipitation on site was calculated to be 50m<sup>2</sup> (site discharge point of 6%).

#### **IMPACT SIGNIFICANCE AND PREDICTIONS**

The EIS notes that impacts on geology/geomorphology are likely to be of *minor to major significance*, in view of the extraction of mineral resources, however the amount extracted will only be approximately 1,130m<sup>3</sup>.

In terms of groundwater, impacts resulting from spillages of oil/fuel and leakages from batteries are expected to be *minor significant* and *major* only in cases of a large spillage. Following mitigation measures (impermeable hardstanding, oil-water interceptor, bunding), impacts are expected to be *not significant*. Potential impacts on groundwater due to mercury deposition off-site are unknown.

Potential impact from used firefighting water in case of a fire is expected to be of *minor significance* provided that appropriate mitigation measures (i.e. used water will be collected in the cesspit / reservoir and any overflow leaving the site will have been treated) are adhered to.

#### *PROPOSED MITIGATION MEASURES*

The EIS proposes the following mitigation measures during operation:

- The entire site surface will be covered in concrete underlain by a geotextile membrane;
- The ground in outdoor areas of the site will be laid to fall towards an oil-water interceptor before being received in the reservoir;
- Wastewater from any washing of floors in the WEEE treatment building will be collected in gutters, filtered to remove trace contaminants, and received in an underground cesspit for reuse;
- Only treated surface water / wastewater will be received in the underground reservoir and cesspits; and
- Cesspits will be impermeable.

#### *RESIDUAL IMPACTS*

With the implementation of the appropriate mitigation measures proposed above, residual impact from potential overflow of used fire water on surface water run-off is considered to be of *minor significance*. In terms of impacts on mineral resources, residual impact is still identified as being of *minor to major significance* since it cannot be mitigated.

### **3.2 Landscape and Visual Amenity**

The landscape assessment and visual amenity assessment is based on a desk study and field survey. The visual amenity assessment was also based on the assessment of related viewpoints. The Zone of Theoretical Visibility (ZTV) is illustrated in Figure 6.1 (page 99) of the EIS Coordinated Assessment.

#### *GENERAL LANDSCAPE DESCRIPTION*

The development site is located within the Ħal Far Industrial Estate which is situated on a former airfield, lying on the coast between Żurrieq and Birżebbuġa. Other uses have been developed in its vicinity including warehousing and a detention centre. The proposed site is flanked by an operational container depot as well as undeveloped land, concrete batching plants and a shooting range. A small hamlet is located further east of the site. The industrial estate has encroached closely the cliffs which characterise the southern coast of the Maltese Islands. This area is characterised with dumping which can be observed on and around the natural cliff habitat. Wied Żnuber interrupts the cliffs and is abutted on both sides by the said industrial estate.

#### *Landscape characterisation<sup>2</sup>*

The following are the landscape character types and landscape character areas as identified in the EIS:

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<sup>2</sup> Landscape types and character areas that provide the landscape context to the development site are listed in this section. The distinction between the types and areas is defined as follows:

- Landscape Character Types: describe distinct and homogenous generic landscape units that share common combinations of elements.
- Landscape Character Areas: single unique areas that represent the discrete geographical areas of a particular type. Each of these areas can be divided into Local Landscape Tracts (LLT) that describe potential problems and pressures affecting the landscape character.

- *Industrial Area*: Hal Far Industrial Estate and certain adjacent similar uses, with low landscape sensitivity.
- *Birżebbuġa Hinterland*: Shooting range, farmed land, areas planted with Eucalyptus trees; and hamlet and farms, with moderate landscape sensitivity.
- *Cliffs*: Designated Area of High Landscape Value including vertical cliffs which edges support rupestral habitats and Wied Żnuber, with high landscape sensitivity.
- *Port Activities*: Maritime/port activity at the coast, comprising three Local Landscape Tracts:
  - LLT: Freeport – Landmark terminal, with low landscape sensitivity.
  - LLT: Oil Tanking – Oil Tanks, with low landscape sensitivity.
  - LLT: Liquigas Malta – LPG facility located within a quarry which is scarring the coastline, with low landscape sensitivity.
- *Birżebbuġa settlement*: residential settlement located in a touristic place and maritime leisure activities supported including a local sailing club.

#### *VISUAL AMENITY*

Four viewpoints (VPs) (Figure 6.1 – page 99 of the EIS Coordinated Assessment) were identified to assess the visual impact of the proposed development as follows:

- Viewpoint 1: Triq il-Fortizza.
- Viewpoint 2: Triq Hal-Far.
- Viewpoint 3: Road in front of/abutting Site (no street name).
- Viewpoint 4: Area looking towards the back of the Site (no street name).

Field investigations, however revealed that containers placed in front of the proposed development have partially blocked Viewpoint 3. Given that this viewpoint does not reflect a viewpoint of a sensitive receptor it was omitted from further studies in the EIS.

#### *IMPACT SIGNIFICANCE AND PREDICTIONS*

##### *Impacts on landscape character*

In terms of landscape character, the EIS notes that there shall be *no significant impacts* on the landscape character areas given the small scale nature of the proposed development.

##### *Impacts on visual amenity*

Impacts for each of the viewpoints analysed in the EIS are as follows:

- Viewpoint 1: Triq il-Fortizza – *Not visible*.
- Viewpoint 2: Triq Hal-Far – *Not visible*.
- Viewpoint 4: Area looking towards the back of the Site (no street name) – *Minor significance*.

The EIS notes that the impact of the proposal on the visual amenity from the Viewpoint 4 is of *minor significance*, while from the other viewpoints the site is not visible. Regarding impact significance, this is dependent on the scale of change to the landscape and the visual amenity of the area, the intrinsic value of which was classified as *low* and the sensitivity of the receptors that will view the proposed development.

#### *PROPOSED MITIGATION MEASURES*

In terms of mitigation measures, given that no significant impacts were identified in the EIS, no mitigation measures are necessary. Nevertheless, a landscaping scheme is being proposed along the northern and eastern part of the site as indicated in Figure 3.10 (page 25) of the EIS Coordinated Assessment.

### **3.3 ECOLOGY**

The Ecological Assessment was limited to considering potential ecological impacts on the proposed site. Potential impacts on the SAC and SPA of the cliffs as well as seabirds were considered to be outside the Area of Influence of potential impacts that may arise from the proposed development. Drawing 7.1 (page 121) in the EIS Coordinated Assessment illustrates the area of influence of the ecological study. An ecological

baseline survey was carried out in May 2015 and it has resulted that a ruderal community typical of disturbed ground having limited ecological value was recorded. Some of the species recorded include: *Avena sterilis* (Animated Oat), *Daucus carota* (Wild Carrot), *Glebionis coronaria* (Crown Daisy), *Galactites tomentosa* (Mediterranean Thistle), *Foeniculum vulgare* (Fennel), *Malva sylvestris* (Common Mallow), *Dittrichia viscosa* (Sticky Fleabane), *Euphorbia pinea* (Pine Spurge), *Ecballium elaterium* (Squirting Cucumber), and *Cynodon dactylon* (Bermuda Grass).

A number of snakes were identified on site during a separate site visit and based on the description, it is likely that the species was *Coluber viridiflavus carbonarus* (Black Whip Snake) [RDB13: Vulnerable].

### 3.3.1 IMPACTS ON ECOLOGY

The EIS indicates that the direct habitat and associated wildlife loss as a result of site clearance and excavation is the main impact. Given the relative extent of the ruderal community that was growing within the site boundary when compared to the full extent beyond the site, and assuming mobile species migrated away from the site during site clearance, and also considering the limited ecological value of the site, the loss of the ruderal community recorded at the site is considered to be of *minor significance*.

### 3.3.2 PROPOSED MITIGATION MEASURES

No mitigation measures were identified.

## 3.5 Noise

The noise assessment undertaken considered the potential noise impacts arising from the construction (related activities) and operation (particularly crushers and machinery onsite) of the proposed facility.

### CONSTRUCTION NOISE ASSESSMENT

Construction is envisaged to be phased over a period of approximately 14 months with site clearance, excavation and frame construction to take approximately six to eight months whilst finishing is estimated to take four to six months. Given the nature of the construction works (with limited excavation for foundations, reservoir and cesspits only, and the construction of a single storey building), the noise impacts are expected to be localised.

Two residential areas were identified as potential sensitive receptors were chosen as the monitoring locations (monitoring points - MP). The MP chosen are (i) Point A - Residential properties on Triq il-Mitjar l-Qadim, off Triq Hal Far located at 163 meters north of the site and (ii) Point B - Western edge of Bengħisa rural hamlet located at 367 meters east of the site. The locations of the two MPs are indicated in Figure 8.1 (page 133) in the EIS Coordinated Assessment. A list of all the plant and machinery to be used on site during construction and their sound levels are provided in Table 8.4 (pages 138) of the EIS Coordinated Assessment.

The average background sound level recorded at MP A was 52 dBA LAeq; the maximum sound level recorded was 74 dBA LMax. The average background sound level recorded at MP B was 50 dBA LAeq; the maximum sound level recorded was 83 dBA LMax.

### OPERATIONAL NOISE ASSESSMENT

The EIS identifies that potential noise generating activities during operation include the three crushers (a main crusher, an electric cable crusher, and a crusher for fluorescent tubes), a compressor, a gasification plant, and a number of machineries on site. A list of all the machinery and plant envisaged to be used in operation and their respective sound level can be found in Table 8.6 (pages 140) of the EIS Coordinated Assessment.

## IMPACT SIGNIFICANCE AND PREDICTIONS

The predicted highest construction noise levels at MP A (63 dBA) and MP B (56 dBA) could potentially exceed the maximum weekend threshold value (55 dB), however, the levels are likely not to exceed 65 dB<sup>3</sup>. Hence, it is predicted that there would be a *minor impact* on the sensitive receptors during the weekend during the noisiest stage of the construction works.

The predicted highest construction noise levels at both MPs are below the week day threshold value of 65 dB; hence, it is predicted that there would be *no significant impact* on the sensitive receptors during the week during the noisiest stage of the construction works.

During operation, in the case of MP A, the rating level (45 dBA) is 7 dB below the background sound level (52 dBA). In the case of MP B, the rating level (38 dBA) is 12 dB below the background sound level (50 dBA). The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or significant adverse impact. Based on the assessment criteria outlined above, it is predicted that there will be *no significant impact* from the proposed facility during operation at the sensitive receptors in the vicinity of MP A and MP B.

### PROPOSED MITIGATION MEASURES

- Submission of a detailed Construction Management Plan (CMP); and
- Adhering to the provisions of the Environmental Management Construction Site Regulations, 2007.

### RESIDUAL IMPACTS

With the implementation of the appropriate mitigation measures, construction residual impacts are considered to be *not significant*.

## 3.6 ENVIRONMENTAL RISK ASSESSMENT

An environmental risk assessment (Chapter 9 of the EIS Coordinated Assessment) was carried out as part of the EIA in order to identify and evaluate any risks likely to be generated by the proposal, the consequences that can occur within the proposed unit or the surrounding environment, and mitigation measures.

The environmental risk assessment is the process by which source-pathway-receptor linkages are identified and evaluated. If any of the latter three elements are absent then there is no complete linkage and thus no unacceptable risk. Figure 9.1 (page 151) of the EIS Coordinated Assessment provides a clear example of a basic source-pathway-receptor model associated with the operation of underground storage tanks.

The proposed operations will include storage and processing of hazardous substances and waste which, without mitigation, could create a risk to the environment through underground, surface and airborne pollution. The following is a list of potential sources of pollution adapted from Table 9.4 (page 155-157) of the EIS Coordinated Assessment which also provides the respective pathway to the relevant receptors and mitigation measures:

- Spillage of diesel / oils;
- Metal emissions from manual dismantling of general WEEE and storage of separated components;
- Mercury / phosphor emissions from fluorescent tube storage and crushing;
- Metal / phosphor emissions from breaking of CRT neck;
- Leakage of lead / acid from batteries;
- Used firefighting water (generated in case of a fire / explosion);
- Fire / explosion;
- Contamination from flooding; and
- Contamination from an earthquake.

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<sup>3</sup> BS 5228: 2009 Part 1 Annex E outlines criteria for assessing the significance of construction noise impacts; cites a week day (excluding evenings) threshold value of 65 dB in cases where the ambient noise level (the measured baseline noise level) is less than 65 dB (when rounded to the nearest 5dB), a threshold value of 70 dB in cases where the ambient noise level is 65 dB (when rounded to the nearest 5dB), and a maximum threshold value of 75 dB in cases where the ambient noise level is higher than 65 dB; the guidance also cites a noise insulation trigger value of 75 dB.

Without any mitigation measures, risk levels for each source identified above, ranged from moderate to extreme. The extreme risk level were reached for (i) mercury/phosphor emissions from fluorescent tube storage and crushing and (ii) metal/phosphor emissions from breaking of CRT neck; due to the particular hazards of mercury and the fact that the glass will be finely crushed.

With the proposed mitigation measures, the majority of the risk levels for each source identified above ranged from *low to very low* for the exception of (i) fire/explosion (delayed response) which resulted as *moderate risk level*; and (ii) mercury/phosphor emissions from fluorescent tube storage and crushing which obtained an *uncertain risk level*.

The environmental consequences of a fire / explosion depend on how quickly the fire is tackled and since the response might be delayed if the fire occurs outside operating hours, the risk level was raised to moderate. However, the EIS suggests that procedures and equipment are put in place to tackle a fire as soon as possible and thus reduce the risk of it spreading beyond the site.

The EIS established an unknown risk level for mercury/phosphor emissions from fluorescent tube storage and crushing given that emissions could not be determined with certainty as the capture efficiency of the mercury filter is not known. Mitigation measures being proposed include a two-room setup, a HEPA filter and impregnated charcoal filter in series, and a water mister.

The EIS established an unknown risk level for mercury/phosphor emissions from fluorescent tube storage and crushing given that emissions could not be determined with certainty as the capture efficiency of the mercury filter is not known. Mitigation measures being proposed include a two-room setup, a HEPA filter and impregnated charcoal filter in series, and a water mister, according to the EIS. Mercury emissions during tube crushing from current applicant's present operating site in Żabbar reached  $0.9\mu\text{g}/\text{m}^3$ . MEPA requires emissions from the operation of the proposal not to exceed  $0.2\mu\text{g}/\text{m}^3$  at any time however the EIS states that it is unclear whether such value will be achieved. However, the EIS concluded that MEPA's urban background monitoring station at Żejtun obtained mercury levels in the region of  $2\mu\text{g}/\text{m}^3$  and which proposed site is located next to concrete batching plants and thus baseline emissions may be higher, due to the possibility of cement dust containing mercury. Furthermore, given the distance of the closest residential receptors (located 180m upwind of the proposed site), it is unlikely that residents will be exposed to emissions from the proposal that exceed  $0.2\mu\text{g}/\text{m}^3$  at any one time. As a mitigation measure, monitoring for mercury as part of the IPPC application is being proposed.

#### **4. EPD COMMENTS AND CONCLUSIONS**

The Environment Protection Directorate notes that this project is situated within the Hal Far Industrial Zone, an industrial area most of which is already developed. This industrial park accommodates various industrial developments and therefore the construction of the building *per se* does not raise any concerns from an environmental point of view. Furthermore, EPD acknowledges that this project will facilitate Malta's achievement of the minimum WEEE collection rate and WEEE recovery targets set by the Waste Management Plan for the Maltese Islands (2014-2020) and the Waste Management (Electrical and Electronic Equipment) Regulations (Legal Notice 204 of 2014). Such operations however must be carried out without causing major adverse impacts on the environment.

As discussed in the above sections, the EIS has predicted a number of potential impacts on the environment as a result of the proposed development, most of which have been identified as not significant or having a minor adverse significance. Minor to Major adverse significant impacts are related to the geo-environment namely the excavation of mineral resources; the contamination of surface water runoff and; the change in the quality of groundwater. However, for the exception of the excavation of the existing mineral resources, adverse impacts may be adequately mitigated by covering the entire site with an impermeable surface, specific bunding, interceptors, and impermeable cesspits. Overall, the significance of the residual impacts is subject to the implementation of appropriate mitigation measures during both construction and operation of the proposed facility.

EPD is however concerned with the uncertainty resulting from the environmental risk assessment with regards to the environmental consequences of mercury emissions from tube crushing. The EIS states that such scenario was uncertain given: (i) the absence of a baseline mercury scenario; and (ii) the anticipated level of mercury emissions from fluorescent tube storage and crushing could not be determined with certainty as the capture efficiency of the mercury filter is not known. Mitigation measures as part of the IPPC application are being proposed in the EIS and include a baseline monitoring to establish current mercury

levels on site and periodical monitoring during operation. This will aid in establishing the effectiveness of the proposed mitigation measures in reducing mercury emissions from the facility. EPD is in agreement with the mitigation measures proposed in the EIS and that such an issue may be sufficiently tackled through the IPPC process. However, such practice of leaving certain operational details, including anticipated level of mercury emissions, details on the need for the pre-treatment of ash, and packaging of broken CRTs which the EIA Coordinator identifies as operational details and which can be handled through the IPPC permit for the site, is not encouraged by EPD. The EIA and IPPC processes should be coordinated and carried out in synchronisation to avoid vague operational details whose potential impacts cannot be adequately assessed at the EIA stage. Alternatively, should concerns remain related to the abatement measures in place for processing of fluorescent tubes during the IPPC assessment, then this crushing activity will not be permitted.

Mitigation measures as proposed in the EIS are to be implemented together with monitoring during operation to minimise any potential impacts on the surrounding environment. Apart from the mitigation measures emerging from the EIS, which are being recommended to be included as part of the development permit application, the Environment Protection Directorate is also including additional recommendations in terms of environmental monitoring during operation. All monitoring of emissions and regular reporting of activities should be submitted to both environmental and health authorities so as to ensure transparency of operations on the site. A comprehensive construction management plan (CMP) is also being requested to address the issues relevant to the construction-phase works.

In light of the above, the Environment Protection Directorate is in agreement with the main conclusions of the EIS and is of the opinion that the necessary mitigation measures need to be integrated into the project; including amendments to the design which are also being recommended accordingly.

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**Appendix I: Comments received through EIS Scoping stage (30 October and 21 November 2012).**

**A. Transport Malta (e-mail dated 20 January 2015),**

Comments	EPD Comments
Transport Malta has no information it wished to see included in the terms of reference of the Environmental Impact Statement.	Noted; no further comments.

**B. Malta Resources Authority (e-mail dated 28 January 2015),**

Comments	EPD Comments
The development site is in question not located within the groundwater protection zone.	Noted; no further comments.

**C. Birżebbuġa Local Council (e-mail dated 6 February 2015),**

Comments	EPD Comments
<p>With reference to development application having tracking number TRK 159436, it is proposed that Terms of Reference of Environmental Impact Statement are to follow the general lines determined in IP004/12/A relative to proposed baling plant at Hal-Far. In addition it is emphasised that the following points are to be given due consideration:</p> <ol style="list-style-type: none"> <li>1. Noise impacts of operations on B'Buga residential area,</li> <li>2. Impacts of water runoff from site on valley system,</li> <li>3. Method of storage of toxic and hazardous waste and the impacts of potential spillage or dispersal of such waste on B'Buga,</li> <li>4. Water storage on site and the utilisation of such water storage in plant's operations,</li> <li>5. The carbon footprint of the plant's operations, including the generation of electricity on site.</li> </ol>	Noted; no further comments.

**D. Environmental Health Directorate (e-mail dated 9 January 2015),**

Comments	EPD Comments
<p>With reference to your e-mail dated 20 January 2015 regarding subject indicated in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development:</p> <ol style="list-style-type: none"> <li>1. Air pollution especially from emissions to air during the operation of the Scheme, from particulate matter during the site clearance, excavation and construction stage and the effects on the Area of Influence, the general public and on the environment.</li> <li>2. Noise and vibration impacts during the construction and operation of the Scheme.</li> <li>3. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site.</li> <li>4. Potential accidental spillage of hazardous fluids, fuel and lubricants and their management and storage.</li> <li>5. Waste management and disposal issues for all generated waste streams during the construction and operation of the Scheme.</li> <li>6. Traffic management and related problems and access arrangements including safety measures.</li> <li>7. Mitigation measures regarding aquatic sources in terms of water quality including surface water and wastewater management.</li> <li>8. Potential adverse public health impacts during the construction and operational stages.</li> <li>9. Description of the hazards associated with the development. These should take into consideration health and safety and emergency measures.</li> <li>10. Assessment of the overall cumulative impacts of the development on sensitive receptors and on the general public.</li> </ol> <p>Proposed cesspits are to be duly registered with the Superintendent of Public Health and reservoir harvested rain water should not be used for human consumption or for personal use.</p>	Noted; no further comments.

<p>The EPS should also include a detailed description of the measures envisaged to prevent, minimise and where possible offset any significant adverse health effects on sensitive receptors in the Area of Influence and on the general public. This should include details of monitoring programmes that may be proposed. The EPS should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.</p>	
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**E. BirdLife Malta (e-mail dated 11 February 2015),**

Comments	EPD Comments
<p>Further to our telephone conversation on the day, our concern with this development concerns mostly light pollution at Hal Far which is a problem for the seabird colonies we find in the area. As things currently stand we receive reports of various strandings of mostly Scopoli's Shearwater within the industrial area every year.</p> <p>Accordingly it would be expected that MEPA takes care of this issue by ensuring that any further development does not result in a further increase in light pollution, but rather be a model for sustainable development with appropriate lighting scheme suggested and monitored after the development is made.</p> <p>One would for this reason expect the developer to submit a detailed lighting assessment and inform the authority of the manner in which the development may contribute to decreased lighting pollution as opposed to increasing it. Furthermore it would be expected of MEPA to ensure that the proposed lighting scheme is adhered to after the development is made, and possibly also as a permit condition.</p> <p>You may find the attached report as a suitable insight into the scale of the problem seabird colonies face as a result of existing development at Hal Far.</p> <p>Link to report: <a href="http://www.birdlifemalta.org/photos/otherfiles/5922.pdf">http://www.birdlifemalta.org/photos/otherfiles/5922.pdf</a></p>	<p>Noted; no further comments.</p>

**F. Superintendence of Cultural Heritage (e-mail dated 23 Febraury 2015).**

Comments	EPD Comments
<p>We refer to your Letter of Consultation dated 20 January 2015 and the Project Description Statement found on the website</p> <p>Proposed development The application proposes:</p> <ul style="list-style-type: none"> <li>- the removal of dumped material,</li> <li>- the construction of an industrial unit for the recycling/treatment of waste,</li> <li>- the construction of an underground reservoir.</li> </ul> <p>Heritage Assessment The property lies within an Outside Development Zone and Industrial Area. It lies close to the scheduled site of archaeological importance of Wied Znuber Dolmen.</p> <p>The area seems undisturbed from previous development and is covered in vegetation and dumped material.</p> <p>Rock-cutting will take place for the construction of the underground reservoir and foundations for the building and services.</p> <p>Recommendations and conditions</p> <ol style="list-style-type: none"> <li>(1) The Superintendence of Cultural Heritage finds no objections in principle to the proposed development, but since extensive rock-cutting is being proposed in an area which may contain archaeological remains, the Superintendence requires the site to be archaeologically evaluated prior to the issuing of a development permit on this site. The archaeological evaluation is in terms of the Cultural Heritage Act, and will be carried out in keeping with directions and Terms of Reference issued by the Superintendence and will be resourced by the applicant;</li> <li>(2) This archaeological evaluation is intended to inform eventual planning decisions on protection or on mitigation measures as may be necessary in terms of the Cultural Heritage Act;</li> </ol>	<p>Noted; no further comments.</p>

<ul style="list-style-type: none"><li>(3) The archaeological evaluation will be carried out without prejudice to approval or otherwise of the application;</li><li>(4) The applicant is to communicate directly with the Superintendence by sending an email on heritage.superintendence@gov.mt to initiate the archaeological evaluation. Terms of Reference for the archaeological evaluation will be issued to the applicant after this email is received.</li><li>(5) The EIS should take on board the results of the archaeological evaluation.</li><li>(6) The Superintendence will comment further on the proposed development once the EIS with the results from the archaeological evaluation is issued.</li></ul>	
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## Appendix II: Minutes of EIS scoping meeting dated 4 February 2015

Meeting	Scoping Meeting: 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	04 <sup>th</sup> February 2015
Location	Malta Environment and Planning Authority, Hexagon House, Marsa.

Present: Mr. Charles Grech (EPL)  
Mr. Robert Cortis (Scientist)  
Perit Joe Grech  
Ms. Rachel Xuereb (ADI Associates)  
Mr. Mark Sultana (MEPA)  
Ms. Josianne Abela Vassallo (MEPA)  
Ms. Pauline Agius Farrugia (MEPA)  
Ms. Charmaine Zerafa (MEPA)

None of the stakeholders invited, attended the meeting.

**APPENDIX III: Comments received during EIA Review (29 May 2014 and the 30 June 2014)**

**A. Environmental Health Directorate (Email dated 13 August 2015)**

Comments	Responses	EPD Comments
<p>Applicant is to adopt best practice methods together with good site practices and ensure compliance with Environmental Management Construction Site Regulations during the excavation and construction phase so as to cause least nuisance and address adverse air (from dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors in the Area of Influence. Hence the importance of drawing up and implementation of a Construction Management Plan to ensure adherence to proper site management practices so as to address groundwater and surface water pollution, to mitigate other adverse construction impacts, including construction traffic impacts and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.</p> <p>It is pertinent that during the operation of the Scheme all proposed mitigation measures highlighted in EIS especially regarding air emissions from the release of mercury vapour and phosphor/glass dust from the crushing of fluorescent tubes, noise impacts from plant/machinery (crushers, compressor and gasification plant) and from the dump trucks transporting waste to and from the site and adverse impacts on ground and surface water run-off are to be strictly implemented. The proposed monitoring especially the air monitoring programme should also be implemented.</p> <p>It is also pertinent that all proposed mitigation measures regarding all identified pollutants during the operation of the Scheme be strictly implemented. Moreover in view that as stated in EIS, the risk associated with emissions from fluorescent tube crushing and storage depend on current mercury baseline levels and on the level of emissions during the operation of the Scheme and is therefore still uncertain, this issue of mercury levels and emissions together with periodic operational monitoring should be addressed through the IPPC permit application process. Potential impacts on ground water due to mercury deposition off-site should also be taken into consideration.</p> <p>Adequate measures should be taken so as to prevent adverse impacts caused by unsafe, inadequate storage, improper handling and potential accidental spillage of hazardous fluids, fuel and lubricants which are to be well managed and adequately stored.</p> <p>Traffic management and access arrangements should be taken into consideration to prevent any nuisances and adverse impacts, including impacts from dump tracks transporting waste material to and from the site.</p> <p>A waste management strategy should be adopted and</p>	<p>Noted. These issues will be addressed through the planning permit.</p> <p>Noted. As identified here, this application is also subject to an integrated pollution prevention control permit. As part of this process baseline air monitoring for mercury has already been carried out, which shows that baseline levels of mercury at the site are below the limit of detection (&lt;0.05 µg/m3).</p>	<p>Noted; no further comments from an EPD point of view.</p>

<p>strictly implemented so that all generated waste streams will be contained, separated and disposed of safely through the appropriate facilities and according to the necessary permits/licences.</p> <p>With regards to handling, storage and disposal of hazardous waste, adherence to regulatory codes and procedures and due diligence is important in view of the health and safety of sensitive receptors.</p> <p>Proposed cesspits are to be duly registered with the Superintendent of Public Health and reservoir harvested rain water should not be used for human consumption or for personal use.</p> <p>Pest control treatments are to be regularly carried out by the management both inside and outside the facility. Records are to be kept by the management and these are to be available to the competent authorities when required.</p> <p>The necessary mitigation measures are to be taken by Applicant to prevent/address nuisances and adverse impacts at all stages of this project on the Area of Influence and to prevent, minimise and where possible offset any other significant/adverse and unpredicted health effects and nuisances which may arise. The possible health effects of any residual impacts that cannot be mitigated and cumulative impacts, especially related to mercury emissions, should also be taken into consideration and adequate mitigation measures implemented.</p> <p>Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.</p>		
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**B. Malta Resources Authority (Email dated 14 August 2015)**

<b>Comments</b>	<b>Responses</b>	<b>EPD Comments</b>
<p>The Authority has no further comments.</p> <p>With the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations shall have effect as if made under the Environment and Development Planning Act and the Sustainable Energy and Water Conservation Unit (SEWCU) is the Competent Authority for groundwater and for the Protection of groundwater under both pieces of legislation. Therefore these comments are being made without any prejudice to SEWCU'S competence at law and to any comments and submissions which SEWCU may make.</p>	<p>Noted.</p>	<p>Noted; no further comments from an EPD point of view.</p>

**APPENDIX IV: Comments post-certification (8 September – 29 September 2015 and 13 October – 20 October 2015)**

Birżebbuġa Environmental Action Group (e-mail dated 20 October 2015).

**Coordinated Assessment**

BEAG Comments	Adi Response	MEPA Comments
<i>General comments</i>		
Since the processing of WEEE is in line with the EU Solid Waste Framework, local legislation and the Waste Management Strategy, in principle, BEAG is totally in favour of the proposed 'industrial unit' for the processing of WEEE. However, BEAG demands that such a unit, including its operator and its operations, be in full compliance with extant environmental laws, and safety norms, especially with regard to emissions to air and wastewaters.	Noted. In addition to requiring a development permit and an EIA the proposed development also requires an Integrated Pollution Prevention Control permit (the most onerous of environmental permits in Maltese legislature). The latter is also subject to public consultation.	Noted. No further comments.
Unfortunately, the EIS (Version1: July 2015) as prepared by Adi Associates, contains an inordinate number of misleading references, especially those relative to wood processing and gasification plants, which have no relationship to the current WEEE application and its related operational 'Scheme'. BEAG expected that Adi would have updated its EIS, eliminating all irrelevant information and data, and introducing any newly arising guidance information.	The EIS includes a description of the process in line with the Applicant's intention which is to first process wood in the main crusher but eventually to introduce a gasification plant; this is intended as a long-term project. The Consultants cannot withhold this information since these proposals are clearly in the Applicant's plans for development. This information will also be included within the IPPC application, which is being prepared concurrently with the EIA, indicating the Applicant's commitment to introduce a gasification plant at a later date. It is considered that all information provided in the EIS is relevant to appropriately inform the public – the Consultants should not withhold any information gathered about the process as this would not be in line with good practice and in line with MEPA's requirement in the Terms of Reference (section 1.2.7) to address longer term developments.	Noted. The gasification plant does not form part of this application and should such plant be proposed, this may require further EIA Assessment.
It is a pity that during her presentation and amplification on environmental risks and impacts, the ADI representative confirm during the Public Consultation that their low risk-impact EIS review was based on 'newly arising information', without ever providing any amplification as to what this info was all about, and how it was acquired. Those present for the public consultation were apparently expected to accept such unbecoming and unethical declarations.	The presentation included the outcome of the risk assessment as presented in the EIA. Refer to slide 18 in presentation included as <b>Appendix 1</b> to this Addendum. The Consultants then went on to explain that the Applicant had carried out further research into operational issues related to the abatement system associated with the crushing of fluorescent tubes (as part of the IPPC application) and that a decision had been taken on the type of filtration system to be adopted – that is two Carbon filters and 1 high efficiency particulate air (HEPA) filter to be put in place to ensure that the emissions (from the neon tube crushing process) do not exceed the most stringent WHO air quality standards in terms of mercury. It was then explained that with this abatement system in place, the risk specifically associated with mercury emissions from fluorescent tube storage and crushing would be classified as low as opposed to the previous classification of 'uncertain'. Given that the risk assessment classified a risk as uncertain, once further information was available to then classify the risk in accordance with the methodology presented in the EIA, it was considered good practice to do so and the Consultants felt that the public attending the public hearing had a right to know all developments in the process. The public hearing presented an opportunity to present this latest information. The filter specifications are presented in <b>Appendix 2</b> of this Addendum.	Noted. However, the practice of leaving certain operational details which the EIA Coordinator identifies as operational details and which can be handled through the IPPC permit for the site, is not encouraged by EPD. The EIA and IPPC processes should be coordinated and carried out in synchronisation to avoid vague operational details whose potential impacts cannot be adequately assessed at the EIA stage.  The report makes frequent reference to the IPPC application process, during which technical aspects of certain activities and their related abatement measures will be assessed. Whilst acknowledging this perspective, it is to be made clear that the various said activities will only be covered by the IPPC permit in conjunction with provision of full information on all technical aspects of the operations and related abatement levels achieved, being proven to the satisfaction of the Authority. Where any uncertainties involving proposed techniques and measures remain, these will not be included as part of the final IPPC permit.
The plans as submitted in the EIA and in any and all reference to MEPA application TN 159436 should be revised to reflect the actual recycling and treatment of WEEE, eliminating any and all references to a 'gasification unit' in the covered storage area since this is not related to the processing of WEEE, as per present considerations at MEPA.	The Applicant has included all planned aspects of the Scheme in the relevant plans. The EIA must ensure that all planned aspects are considered in the Scheme description as per best practice. The gasification plant can, however, be left as a reserved matter until a plant has been selected by the Applicant and further details are provided at a later stage (such as through an application for variation of the IPPC application); this would, however, be MEPA's decision.	Noted. The gasification plant does not form part of this application and should such plant be proposed, this would require further EIA Assessment.

Page	Para.	BEAG Comment	Adi Response	MEPA Comments
<i>Revision of submitted plans</i>				
47	Figure 3.16	The collection and recirculation of 'trapped' mercury vapours and 'treated' wastewaters from the fluorescent / neon tube crusher at the 'sealed cesspit', should be revised to include a safe double jacketed cesspit (i.e. PVC / plastic container within a rendered concrete block cesspit) that allows for a volumetric gauge, leak-proof verification and certification by a warranted engineer, safety factors against the potential release of mercury vapours, and facilities for the required testing prior to 'WSC / MEPA' approved sewer or eventual export disposal of this type of hazardous wastewaters.	<b>Figure 3.16</b> has been updated and is included as <b>Figure 1</b> below. The updated figure illustrates that the cesspit connected to the neon tube crusher room will consist of a prefabricated stainless steel tank inserted into the constructed cesspit which is additionally lined with concrete, a geotextile membrane, followed by a final concrete layer. The design will allow for inclusion of a volumetric gauge, leak-proof verification and certification by a warranted engineer,  Wastewater received by this tank will be filtered through a sand filter (to capture particulates that could compromise the following filter), followed by a Carbon filter (that will capture mercury). A reverse osmosis unit will also be installed to capture any residual dissolved metals  This filtration plant will be housed adjacent to the fire suppression system, outside the main building as illustrated in <b>Figure 2</b> below. The cesspit will include a ventilation pipe for displaced air that will	Noted. No further comments.

Page	Para.	BEAG Comment	Adi Response	MEPA Comments
			<p>emit into the neon tube crusher room and will thus also allow any mercury vapours to be captured by the air filter system. An automatic level gauge will also be installed to ensure there is always spare capacity in the tank.</p> <p>If discharge of effluent from this tank is required, this will only be carried out after treatment and analysis of the treated water to ensure it meets WSC's / MEPA's requirements.</p>	
47	Figure 3.16	Again the second hazardous wastewater cesspit, intended for the collection of hazardous floor wastewaters of the processing-storage area, containing hazardous PMs from eventual CRT neck breaking and other phosphors as arising from the neon tube crushing should be similarly constructed.	<p>As described above, water reaching the larger cesspit will be treated; it is envisaged that the treatment system will consist of a sand filter followed by a Carbon filter and reverse osmosis unit, the latter to capture any residual dissolved metals. The cesspit will be constructed of concrete and lined with a geotextile membrane to ensure its impermeability, and will be tested for impermeability by a warranted engineer. An automatic level gauge will also be installed to ensure there is always spare capacity in the cesspit.</p> <p>If discharge of effluent from this cesspit is required, this will only be carried out after treatment and analysis of the treated water to ensure it meets WSC's / MEPA's requirements.</p>	Noted. No further comments.
47	Figure 3.16	<p>The finished flooring gradients as proposed in Figure 3.16 Surface water and wastewater management (Block Plan (rain / drainage system) should be revised in order to make it physically impossible for any storm water going out of the Scheme premises and potentially contaminate the nearby Wied il-Mixta watercourse and catchment area, or those in Wied Zhuber, since both are in the area of influence by the Scheme operations, as indicated in Figure 5.5: Hydrology and Hydrogeology (page 85). At this stage, one is to additionally point out that although not conveniently indicated in any layout plans included in the EIS for the scheme WEEE operations, the Scheme site for WEEE processing actually has two boreholes as confirmed by Figure 5.3 Location of bores, page 73 of the EIS. Although the nearest public (WSC) borehole is some 1,000 metres away, in the vicinity of the site there are 'a number of private boreholes' (see paragraph 5.52, page 83). It is true that the EIS confirms that a geotextile membrane would be provided under the concrete hardstanding; but considering the above, and</p> <ul style="list-style-type: none"> <li>The number of underground cesspits and reservoirs envisaged on site, with all the potential leakages, unless seriously technically mitigated, as explained above;</li> <li>The EIS declared (para 5.58, pages 87-88) 'potential impacts on groundwater due to mercury deposition off-site are unknown';</li> <li>The weak and inefficient EIS 'mitigation' measures (para 5.60, page 88), including <ul style="list-style-type: none"> <li>'The ground in outdoor areas of the site will be laid to fall towards an oil-water interceptor before being received in the reservoir', which is useless and inefficient where ecotoxic and carcinogenic (H7 and H14) particulate matter (PMs) from the Cathode Ray Tube (CRT) processing, can easily find their way outside of the processing area through potential continual contamination from uncontrolled employee boots, amongst other;</li> <li>'Wastewater from any washing of floors in the WEEE treatment building will be collected in gutters, filtered to remove trace contaminants, and received in an underground cesspit for reuse' – however, the EIS fails to provide details of any such filtering, and its efficiency factor;</li> <li>In the case of the impact on mineral resources, the residual impact remains minor to major since the impact cannot be mitigated (para 5.61, page 88).</li> </ul> </li> </ul>	<p>As proposed and presented in the figure, the physical flooring gradients result in all surface water falling on the outdoor area and roof being captured in the reservoir after passing through the interceptor i.e. this water cannot leave the site without first being treated.</p> <p>With reference to Figure 5.3 it should be noted that this figure illustrates the location from where core samples were taken as part of the geo-technical investigations and does not refer to boreholes from which groundwater is extracted.</p> <p>With reference to CRT processing, it should be clarified that particulate matter is airborne and captured via the HEPA filters within the processing area located inside the facility. Thus, there is no pathway whereby the PMs can reach the reservoir. Additionally, disposable overalls will be worn by employees working in the CRT / fluorescent tube crushing areas to ensure that any particles that adhere to clothing / shoes are not taken outside.</p> <p>In relation to the fluorescent tube crushing room, further details on mercury abatement have been included in <b>Appendix 2</b> to this Addendum. The proposed system will mitigate mercury emissions to below 0.001 ppb (0.008 µg/m<sup>3</sup>), which is well below the tolerable concentration of 0.2 µg/m<sup>3</sup> for long-term inhalation exposure to elemental mercury vapour estimated by the World Health Organisation (WHO). As a result, the environmental risk from this activity can be classified as low. <b>Figure 3</b> provides design details of the neon tube crusher room.</p> <p>Wastewater treatment details have been described above. Additionally, it is to be noted that the plant will not discharge effluent from the tank / cesspit before the water has been analysed to ensure it meets WSC's / MEPA's requirements.</p>	Noted. No further comments.
25	Figure 3.10	We strongly recommend that the proposed public wayside 'skip', earmarked as a 'civic amenity site', allegedly introduced at the instance of MEPA, be eliminated, since this will give rise to abuse and littering. Moreover, it is considered superfluous when (a) there is a fully fledged, Wasteserv operated, Civic Amenity Site, in the vicinity; and (b) the Scheme Operator has publicly confirmed during the MEPA held consultation meeting that he will be providing a free WEEE waste collection service.	Noted. The Civic Amenity Site was included following a request to do so from MEPA. Since the public hearing, it has been removed. See <b>Figure 4</b> below.	Noted. No further comments.
25	Figure 3.10	Again, it has resulting from proceeding of the public consultation that no geotextile protection is envisaged for the proposed green strip at the front of the site under consideration. In view of the potential hazardous air emissions of PMs and mercury	As explained above, there are no boreholes on site. Also, air emissions are abated through the use of carbon and HEPA filters. The geotextile membrane is not a mitigation measure that aims to address air emissions; it is included to mitigate potential contamination from hazardous liquids	Noted. No further comments.

Page	Para.	BEAG Comment	Adi Response	MEPA Comments
		vapours from site, and the resulting boreholes on and near site under consideration, geotextile protection of this green skip is considered as an environmental 'must' to mitigate any potential risks from the indicated hazardous sources.	stored on site. The green landscaped strip is not exposed to the storage of such liquids, and therefore, in the absence of a pathway, there is no need to introduce this measure in the landscaped area.	
25	Figure 3.10	Similarly, and for the same reasons, the proposed 28 Olive trees, earmarked to be planted at this green strip, should be replaced by indigenous decorative trees in order to forestall any human consumption of olive fruit potentially contaminated with hazardous air emissions from the Scheme site operations.	Although this was not considered to be a risk in the risk assessment, the Applicant has proposed alternative trees to be included in the landscaping scheme (see <b>Figure 4</b> below).	Noted. No further comments.
<i>Reservations on the eventual attainment of the main objectives of the Scheme</i>				
9	3.2-3.3	Granted that the Operator would be following the EIS declared norms, procedures and work practices, the BEAG has strong reservations as to whether the EIS declared objectives of the proposed Scheme (i.e. the WEEE facility) would ever be satisfactorily attained. 'The primary objective of the Scheme is to provide a facility for the preparation for recovery of WEEE...According to EIS page 9, paras 3.2-3, the Scheme aims to: <ul style="list-style-type: none"> <li>Develop a new purpose-built WEEE treatment facility that is equipped with air abatement, surface water management and pollution prevention measures;</li> <li>Facilitate Malta's achievement of the minimum WEEE collection rate and WEEE recovery targets set by the Waste Management Plan for the Maltese Islands (2014-2020).</li> </ul>	Noted.	Noted. No further comments.
32	3.38	Para 3.38, page 32 reports that 'When a WEEE stream is not covered by an approved work plan, no treatment on site will be carried out. In these cases, the waste will be stored on site (typically in the shed) prior to shipment, without any dismantling or processing. This option is planned for those categories of WEEE that the site will not be equipped to treat, such as refrigeration equipment containing ozone-depletion substances...' This is confirmed by EIS Tables 3.1 Incoming waste and raw materials, where some 200 tonnes of fridges/freezers are reported to be earmarked annually for storage prior to export. EIS Table 3.4 Outgoing waste, confirms that these 200 tonnes of 'fridges / freezers will eventually be 'stored and contained' at a designated area in the shed, where the final destination shall be ;exported to authorized facility for recovery (and destruction of the refrigerant).	Noted.	Noted. No further comments.
29; 35	Table 3.1; Table 3.4	The same EIS Tables 3.1 and 3.4 confirm that the same fate and 'laissez faire' are earmarked for an annual total of some 50 tonnes of batteries which shall be stored 'in battery storage bins indoors, and eventually exported to authorized facility for recovery'. The EIS fails to indicate if the Operator is even prepared to sort out and store separately hazardous lead, Ni-Cd and mercury containing batteries.	There will be no separation of batteries carried out as part of the Scheme.	Noted. No further comments.
		However, one cannot but adversely comment on the declared amateurish 'processing' that the Operator would be providing for the Cathod Ray Tubes televisions and monitors. In this instance, the EIS declares that the Operator would be partially dismantling some 300 tonnes annually of these WEEE items that contain highly hazardous 'ecotoxic' components.	The CRT processing to be carried out as part of the Scheme represents the first step in the treatment of this waste. This processed material will then be sent on to another facility for further treatment. The importance of this first step lies in the fact that the CRT is sealed under vacuum pressure. The seal needs to be broken to release pressure and reduce risks during storage and transport of this waste.	Noted. No further comments.
40	3.64	The EIS has reported: 'Cathode Ray Tubes (CRTs) include components such as lead oxide, barium, strontium and zirconium oxide and fluorescent coatings. Fluorescent coating are commonly referred to as 'phosphors', and in CRTs, these can include zinc, cadmium, and yttrium sulphides, copper or silver chloride and occasionally arsenic.	Noted.	Noted. No further comments.
		'While no crushing of the CRTs, is proposed, breaking of the CRT neck [actually proposed] could result in the release of dusts [hazardous particulate matter or PMs] containing these components'.	The EIS has been quoted, however, no comment has been made.	Noted. No further comments.
162; 163	Table 9.6; Table 9.7	Tables 9.6-7 of the EIS reporting on risk levels without mitigation: with mitigation: Mercury / phosphor emissions from breaking of the CRT neck: Environmental Consequences – Major (without mitigation); Insignificant (with mitigation) Likelihood of consequence – Almost certain; Almost certain Resultant risk level – extreme (without mitigation); Low (with mitigation).	Noted. Refer also to the text that describes the assessment presented in the two tables.	Noted. No further comments.
164	Para 9.59	The EIS reports: 'With mitigation, the environmental effects of CRT neck breaking are expected to be insignificant, since the HEPA filter has a 99.97% filtration efficiency on particles more than 0.3 microns. Emissions are routinely generated during dismantling and thus the frequency has been retained as almost certain'.	Noted.	Noted. No further comments.
161	Para 9.36	The EIS reports: Breaking of the CRT neck will take place in a CRT breaking room that includes a thick HDPE curtain with 1-2 inch overlapping panels, equipped with a negative pressure unit connected to a HEPA filter.'	Noted.	Noted. No further comments.
40	Para 3.64	EIS para 3.64 adds 'This design facilitates frequent entry and exit by site operators,	Noted.	Noted. No further comments.

Page	Para.	BEAG Comment	Adi Response	MEPA Comments
		while ensuring that a seal is quickly recreated and that dust is filtered'.		
		During the public consultation, when the Adi Associates representative was questioned about the inordinate low risk factor arising from doubtful mitigation, which include a HEPA filter of 3 microns, when one could easily install and maintain a HEPA filter with 1-2 micron filtration, thus providing a much better filtration efficiency for the hazardous PMs mentioned in para 3.5 above; and that these hazardous PMs would be continually transferred to the processing area and the concrete hardstanding through contaminated boots / shoes and clothing; the only reply furnished was that the official risk factor results following mitigation were provided after new information was acquired and assessed. However, no details of any such info was presented in amplification.	During the public hearing the Consultants clarified that the filters have a high efficiency, as stated in the EIS filtering particles as low as 0.3 µm and not 3 µm. Also, as explained above, fine particulate matter is airborne and will be preferentially filtered through the air filtration system in view of the negative pressure unit to be installed. As part of the operational procedures on site, operators will be required to wear disposable overalls when processing this waste. The risk factor result in this regard remain the same. It should be clarified that the Consultants were referring to the risk assessment for fluorescent tubes storage and crushing when describing that the abatement system for this area had now been decided upon (the referred to 'new information'), which resulted in a change in risk rating from uncertain to low.	Noted. No further comments.
		One noted that the inordinate quantity of hazardous PMs in the CRT treatment room will either be dealt with through a negative pressure and HEPA filter, or, otherwise through floor washing with filtration through a chemical filter.	Airborne particulate matter will be preferentially filtered through the HEPA filter rather than deposited. The filtration system for floor washing has been described above, and will be further elaborated as part of the IPPC application.	Noted. No further comments.
		Unfortunately, the EIS fails to provide any technical details of such chemical filters, including their efficiency values and their effective risk mitigation, and one is therefore required to take the reported low risk factor for granted, without any supplementary guidance.	The EIS does include reference to the efficiency of the air filters. Refer to para 3.61. The filtration system for floor washing has been described above, and will be further elaborated as part of the IPPC application and regulated as part of the IPPC permit; the design will be sufficient to ensure sufficient abatement of any hazardous substances in the wastewater, and there will be no discharge of effluent to sewer unless it meets WSC's / MEPA's requirements.	Noted. No further comments.
29; 35	Table 3.1; Table 3.4	On comparison between the EIS Table 3.1 – para 3.33 (Incoming waste and raw materials) and Table 3.4 (Outgoing waste) for the breaking of the CRT television / monitor necks activity, one notes that out of the estimated 300 tonnes of incoming such waste, an estimated 180 tonnes of hazardous CRT televisions / monitors would be 'exported to authorized recycling facility'. Apart from the 'lacquered' wooden component, one fails to account for the high discrepancy in the figures quoted in the EIS, which in theory should be the recycled factor.	The 180 tonnes refers solely to the glass component of this waste stream.	Noted. No further comments.
		In conclusion, BEAG is not convinced that the WEEE processing through the Scheme is an asset, and considering the quantity of highly hazardous PMs arising from the CRT neck-breaking, one concludes that this particular WEEE process, including the final export of a high percentage of the same waste, as amplified through the EIS, and proposed by the Operator is a great environmental liability that should be prohibited from ever getting any MEPA sanctioning.	Opinion of BEAG noted.	Noted. No further comments.
<i>The proposed fluorescent-neon tube crusher</i>				
31	Para 3.37	The EIS provides the background on the 'fluorescent tube crusher', its operations and related hazardous air and wastewater emission control measures. Bullet no. 3 of EIS para 3.37 appears to give more importance to the resulting facts that 'this activity allows clean glass to be generated and the volume of the tubes to be significantly reduced, thus reducing storage space requirements and the shipping costs'.	It is unclear what point is being made here.	Noted. No further comments.
40	3.61-3.63	EIS paras 3.61-63 provide the proposed processing procedures and alleged related emission risk reduction factors. One notes with regret that the EIS fails to provide the necessary manufacturer's safety and operational standards for this particular crusher, even though this is supposed to be an EU maxim. In like manner, Figure 3.14: Fluorescent Tube Crusher leaves much to be desired for one who is expected to report on this particular process.	It is beyond the scope of the EIA to enter into such detail in relation to the operational specifications of the crusher; the concern for the EIA is any emissions related to this process, not the machine itself. This detail will appear in the IPPC application as far as is relevant.	Noted. No further comments.
45	3.80	The EIS confirms, if any further confirmation on the environmental safety of this particular crusher was required, that all concerned, including and EIS expertise report that 'if any wastewater discharge is required, the wastewater will first be tested in accordance with WSC requirements and either discharged to the sewerage system or exported to an authorized facility'.	As described above, this is a precautionary measure, to be adopted in accordance with good practice.	Noted. No further comments.
35-36	Table 3.4	Outgoing waste reporting on the 'wastewater from fluorescent tube crushing cesspit, the 'destination' caption reports 'normally reused; however, if discharge is required the wastewater will be tested and either (a) discharged to the sewerage network if found to be below the WSC discharge limit; or (b) exported to an authorized facility if not.	Noted.	Noted. No further comments.
		The above comments confirm that all the reported air and wastewater control measures for the fluorescent tube crusher are in fact highly doubtful, and cannot be relied on to provide full compliance with the statutorily required emission limit values or those established by MEPA.	Opinion noted. Specifications on the air abatement system for the crusher are included in the <b>Appendix 2</b> to this Addendum, and all operational aspects of the development will also be presented in the IPPC permit application that will also undergo public consultation. Monitoring will also be undertaken as part of IPPC permit requirements, to verify the efficiency or otherwise of the abatement systems.	Noted. No further comments.
		The EIS additionally provides the misleading information that there are no residents	The information is correct and not misleading. Employees of nearby factories are not residents.	Noted. No further comments.

Page	Para.	BEAG Comment	Adi Response	MEPA Comments
		<p>within a 180 metre radius from site that could possibly be adversely affected through hazardous high mercury emissions vapours from site. One is to note that within this radius there are a number of factory employees and other leisure activity personnel that would be directly affected with highly toxic mercury vapour emissions, let alone the continual health hazards arising from other hazardous PMs arising from the CRT neck breaking.</p>	<p>In addition, further details on mercury abatement have been provided in the <b>Appendix 2</b> to this Addendum.</p>	
		<p>Under the circumstances, BEAG officially asks MEPA to curtail any and all WEEE operations as proposed in the Scheme, that have high air and wastewater emission values, or that ultimately prove to be an unsustainable environmental liability. Until such time as Malta can be equipped with preventative emissions, MEPA should not entertain the building permit as proposed by the applicant. Just for the say to say that we are now recycling hazardous waste the risk is far too great.</p>	<p>Noted. The EIA findings and IPPC application, based on research and assessment, should help to inform MEPA's decision.</p>	<p>Noted. No further comments.</p>

## APPENDIX V: Public Hearing of the EIS Minutes (23 October 2015)

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<b>Meeting</b>	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, Ħal-Far, Qasam Industrijali, Birzebbugia, Malta
<b>Date</b>	23th October 2015
<b>Duration</b>	Circa: 17.35 – 19.20 hrs
<b>Location</b>	Soċjeta Filarmonika San Pietru, 12, Ġawhra San Pietru, Triq Birzebbuġa, Birzebbuġa
<b>EPD representatives</b>	Perit Vincent Cassar (Chairperson); Ms. Josianne Abela Vassallo (EPD); Mr. Mark Sultana (EPD); Ms Pauline Farrugia (EPD)
<b>Minutes taken by</b>	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, Ħal-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 (Birzebbuġa 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, Birzebbuġa 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 Birzebbuġa 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 13<sup>th</sup> 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](mailto:ejamalta@mepa.org.mt), or by post to 'The Director, Environment Protection Directorate, MEPA Head Offices, St Francis Ravelin, Floriana', by Tuesday 20<sup>th</sup> October 2015.

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