



Public Consultation Submissions & Responses

Intent and Objectives: Malta's National Air Pollution Control Programme

April 2019

Environment & Resources Authority



CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Etienne Scicluna 22/03/2019	<p>My family resides near Bulebel Industrial Estate. It is a very well known fact that no studies has ever been conducted about the type of air quality and the type of pollution the factories in the Bulebel area are releasing. Very often, especially during the night, we have to close our windows because we could not resist the pungent odours coming from the factories, let alone those harmful chemicals which are being released in the air that are odourless. In fact, this situation is affected my children who both of them suffer from allergies through the year.</p> <p>The least that could be done is to dispatch some experts to conduct random checks near the Bulebel Industrial Estate in order to identify the source.</p>	<p>The aim of the NAPCP is to include measures to reduce emissions at a national level. Whilst the comment is noted, the nature of the comment is more oriented towards local air quality and nuisance.</p> <p>Complainant was advised to report immediately upon noticing such incidents.</p>
2	Mark Cassar 24/03/2019	<p>Putting it bluntly, if enforcement is carried out as it should be wrt the VRT and on-the-road visual inspections the number of vehicles emitting noxious fumes would be drastically reduced but also the following mitigating measures would decrease the amount of air-pollutants:</p>	<p>Comment is noted. While agreeing with the fact that the VRT/on the road inspections should ensure that the more polluting vehicles are tackled, it should be noted that the NAPCP's approach is more at a macro-level in that it looks at issues such as total fuel burn by the road transportation sector, vehicle kilometres driven, age of the vehicle fleet etc.</p> <p>Therefore, such a measure would have no impact on the total national emissions from road transport, because it mostly concerns the state of individual vehicles, which is not possible to include in the currently available models. This however does not</p>

			mean that the measure will not reap benefits at a local level.
		De-registration of vehicles older than 20-25 years should be considered - being the worst offenders of noxious fumes. Car engines' efficiency is reduced and inversely, pollution increases exponentially even after 5 years of use.	This comment is noted and will be considered for further studies.
		Planting of more trees to reduce CO ₂ levels and removal of other air pollutants and increase in the number of green-areas to mitigate air-pollution.	Comment noted. CO ₂ emissions are targeted by the National Energy and Climate Plan, a draft of which has been completed by the Energy and Water Agency (EWA). The NAPCP deals with air pollutants (SO ₂ , NO _x , nmVOC, NH ₃ and PM _{2,5}).
		More incentives/subsidies for the importation of electric and hybrid vehicles should be considered before the 2030-2040 deadline which has already been set anyway by many car manufacturers and EU countries. Electricity from the power-station moves the pollution from the road (albeit to the environs of the power-station); though the efficiency is higher than the individual internal combustion engines of hundreds of thousands of vehicles on the road) and the power-station emissions are also more strictly controlled.	<p>Comment noted. It is always better to shift emissions to a stationary source such as a power plant because, in the case of the power plant the waste gases are emitted at a certain height above ground level. In addition the abatement technology for stationary sources has already delivered significant reductions with respect to emissions.</p> <p>On the other hand cars emit air pollution in a diffusive manner and at ground level. In addition, abatement of emissions from cars is known to be less effective than those of stationary sources, particularly when the engine is still cold. Therefore the suggestion to financially support the</p>

			importation of cleaner vehicles is supported and is also included in the NAPCP.
		Also HGVs (by far the worst offenders in terms of volume of air pollution and the fact that hundreds of such vehicles are ubiquitous and constantly on the road - unlike passenger vehicles which are utilised on the whole twice per day and for specific errands - need to be specifically included in the plan and subsequent enforcement thereon otherwise the programme would be a non-starter and the goal (reducing the rate of mortality/morbidity and to have cleaner air) would be far from being achieved.	See previous reply regarding local air quality above.
		Infringement of the EU Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants (National Emission Ceilings (NEC) Directive) and the Ambient Air Quality Directive (2008/50/EC) may be financially wasteful and politically damning but the premature deaths of hundreds of people (the scientific estimate is between 473 and 677 - Thomas Münzel, University Medical Centre Mainz, in Germany published in the European Heart Journal) dying every year in Malta from air pollution should be more than enough an incentive to implement air pollution reduction policies and get things done right.	Comment noted. The NAPCP includes measures to improve air quality at a national scale. ERA agrees that reducing harmful effects on human health is a very important consideration. While the cause and effect relationship between air pollution and health can be considered to be quite established one should however be very careful when quoting studies on premature deaths. For example, the WHO relies on scores of studies and not just particular study.
3	Jon Camilleri 26/03/2019	I read your online consultations, as usual I like researching and I think that the way forward is establishing incentives for manufacturing to produce using renewable energies and using better materials.	Noted. The NAPCP includes a number of measures related to the use of renewable energy.

		<p>The use of iron tends to result in rust for example how healthy is that for our skin if we do not dispose of rusted metals in good time?</p> <p>What is the price for value we are paying?</p>	Noted, the NAPCP does not deal with such issues.
4	<p>Mark Cassar</p> <p>13/04/2019</p>	<p>Further to the below please find link to a scientific article (the Lancet) wrt to the link between asthma and nitrous oxide (NO₂) as well as the possible mitigating measures that can be considered; such as replicating London's Ultra Low Emission Zone (ULEZ).</p> <p>The Lancet Planetary Health, DOI: 10.1016/S2542-5196(19)30046-4</p> <p>Millions of child asthma cases linked to traffic pollution every year</p> <p>The scientific evidence is clear, what is required - today before tomorrow - is the political will from ALL sides to act on it.</p>	This comment is noted.
5	<p>Gertrude Buttigieg</p> <p>OBO Malta Health Network</p> <p>15/04/2019</p>	<p>The principle aim of Directive (EU) 2016/2284 i.e. the protection of human health, must be the principle aim and priority of the proposed Malta's National Air Pollution Control Programme. Therefore, the priority should be to reduce pollutants (NO_x, SO₂, nmVOCs, NH₃, and PM_{2.5}) especially in residential zones. Specific reference and consideration to residential areas, urban cores and areas frequented by vulnerable populations/sensitive human population groups e.g. children (school, sport and playground areas); the sick and elderly (hospitals, long term facilities), etc must be made in the proposed programme.</p>	Comment noted. The NAPCP is more oriented towards reducing emissions at a national scale. Notwithstanding this, the NAPCP includes a number of measures related to electro-mobility and sustainable transportation, which aim to contribute in improving air quality also in residential areas.

		<p>The programme should consider measures applicable to road transport as a priority since such a measure will beneficially affect all areas especially residential. Shipping (cruise liners, containers ships, other commercial shipping, etc) in Malta's ports should also be considered as a priority due to the large population residing around the harbour areas (including Marsaxlokk and B'Bugia areas). Domestic heating (note the possible increase in household fireplaces) and small industries such as bakeries, automotive spray painters, etc and construction processes often present within residential areas should be included in further measures to adopt in order to comply with the emission reduction commitments and improve health and wellbeing of population.</p>	<p>As regard road transport, the NAPCP prioritises measures in this sector.</p> <p>Regarding emissions from cruise ships, it is to be noted that the NEC Directive is limited to national navigation and this does not included cruise liner visits. However, studies apart from the NAPCP may be considered.</p> <p>Regarding the smaller industry, the NAPCP also addresses this sector by proposing a new set of Regulations targeting the smaller emitters, which are currently not regulated by EU legislation.</p>
		<p>Objectives should include effective implementation and monitoring (not just emission levels but also environmental permitting or other conditions set for their operation). Penalties applicable to infringements of provisions laid down in the proposed programme should be immediate, effective and dissuasive.</p>	<p>This comment is noted.</p>
		<p>The national air pollution control programmes should be updated at least every four years as per Article 6(3) of (EU) 2016/2284 with appropriate stakeholder involvement and consultation including the competent authorities (especially Health Ministry), local councils, public and NGOs.</p>	<p>The NAPCP will be updated every 4 years in line with the requirements of Article 6(3) of Directive 2016/2284 in consultation with all relevant stakeholders and the general public.</p>

		<p>Article 14 (Access to information) of (EU) 2016/2284 must be adequately reflected in proposed programme, namely ensuring the active and systematic dissemination to the public of the stated information by publishing it on a publicly accessible website.</p>	<p>The objectives of the plan were issued for public consultation whilst the draft of the plan is also being published for a 6 week consultation period.</p>
		<p>Last but not least the Malta Health Network has been on the forefront in Malta promoting the European Charter of Patients' Rights – first right is the Right to Preventative measures. Having better Air Pollution control is in line with the rights which we believe could help to prevent many illnesses and alleviate the quality of life of patients who have health conditions especially respiratory problems.</p>	<p>This comment is noted.</p>
<p>6</p>	<p>Dr. Christine Bellizzi 23/04/2019</p>	<p>In brief I would like the NAPCP to focus and prescribe effective remedies in relation to pollution from construction sites which are a significant source of PM2.5, PM10 and NOx. The emissions from construction sites is to be given additional attention in the context of Malta, in view of the intensity and extent of construction industry. Enforcement of the very scant legislation relating to dust control (mentioned in the Air Quality Plan) is severely lacking and the Building Regulations Office has been effectively been reduced to a toothless hound. Even when enforcement action is taken the penalties are too low to offer a real deterrent. Insufficient attention is being given to the height of buildings that are continuing to rise, thus creating polluted air traps.</p> <p>Furthermore, due attention is to be given to air pollution emitted by docked cruise liners. Malta is a popular port with multiple large cruise liners docking in the Grand Harbour for severely hours, nearly every day.</p>	<p>The NAPCP's approach is more at a macro-level in that it looks at issues such as total fuel burn from the road transportation sector, vehicle kilometres driven, age of the vehicle fleet etc. The document does not look into local air quality issues.</p> <p>Please refer to previous comment in relation to same subject.</p>

		Considering, the ever growing intensity of construction sites, the docking of cruise ships, intense traffic and congestions, industrial activities such as Palumbo are all concentrated in the Valletta - Sliema agglomeration due care should be given to the effects on human health and the public is to be given due warning of the hazards that these present.	Please refer to previous comments on local air quality issues.
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