



# Public Consultation Submissions & Responses

## Malta's National Air Pollution Control Programme

February 2020

Environment & Resources Authority



## CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Mario Sammut 22/11/2019	If air pollution is truly to be reduced, one of the main measures to be taken is to cut down, or better still replace by laser technology, the use of fireworks. Not only they produce CO and CO <sub>2</sub> , but also NO <sub>x</sub> , SO <sub>2</sub> and tons of heavy metal oxides that pollute air, land and water.	Comment has been noted. The NAPCP prioritises the sectors which contribute most to the pollutants regulated by the National Emission Ceilings Directive. When compared to other sectors, fireworks generate minimal emissions of these pollutants.
2	Michael Briguglio 03/12/2019	<p>I am hereby proposing that this policy process incorporates Social Impact Assessments.</p> <p>A social impact assessment reviews the social effects of development and social change, both intended and not.</p> <p>The International Association for Impact Assessment defines an SIA as the process of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions and any social change processes invoked by those interventions.</p> <p>Such changes may range from natural disasters to population growth and from policy interventions to singular development projects. Consequently, SIAs investigate the effects on people's everyday lives in terms of culture, politics, community, health, well-being, aspirations, needs, rights and responsibilities, to name a few. They provide data for policymaking, which is based on evidence.</p> <p>Social impacts under assessment should include all those things relevant to people's everyday life. This may include one's culture, community, political context, environment, health, well-being, personal and property rights as well as fears and aspirations.</p>	Comment has been noted. ERA agrees that such assessments provide useful information for the formulation of environmental policy. ERA is currently developing the National Strategy for the Environment (NSE), a strategic governance document that will set the policy framework for the preparation of plans, policies and programmes issued under the Act or under any other Act related to the protection and sustainable management of the environment until 2050. Social criteria have been taken into due consideration for the selection of the lead scenario for 2050, which will formulate the basis for the development of the strategy.

		<p>Social impact assessments can help verify the consequences and impacts of development proposals in relation to the communities involved. Hence, a basic starting point for such assessments should be the compilation of a community profile. A social impact assessment that does not understand the society in question is practically worthless.</p> <p>This can help bring about genuine processes of engagement between communities, developers and authorities as well as identify and implement mitigation measures and compensation mechanisms. As things stand in Malta, various developers do quite the opposite, often causing huge inconvenience to residents and leaving a mess behind in surrounding infrastructure.</p> <p>Various methods, both quantitative and qualitative could be used within social impact assessments. The former refers to generalisable data especially through numbers, while the latter produce in-depth data on matters.</p> <p>Research methods in SIAs may therefore include surveys of concerned populations who are asked questions on their perceptions of the change in question. Ethnographic methods may involve a deeper look into everyday practices of people, while elite interviews may verify the advice, concerns and interpretations of persons who are experts or who have experience in the respective field under analysis.</p> <p>Methods may also involve the analysis of discourse on the subject in question, for example by looking at what is being pronounced in the public sphere, whether by the public, civil society, political actors, the media and the like.</p> <p>SIAs should involve the participation of different stakeholders, ideally through mixed research methods.</p> <p>Some other factors which should be included in social impact assessments include the consideration of reasonable alternatives</p>	
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		<p>to development proposals as well as comparative analysis of similar development proposals and related good or bad practices. Analytic indicators should be provided and the entire process should be subject to peer review by independent experts in the field.</p> <p>Social impact assessments should not be one-off exercises which are rubber-stamped by authorities without any sense of critical engagement. To the contrary, they should be ongoing processes which engage with various stakeholders and which report back so as to ensure effective policy processes. They should also use complementary research methods so as to ensure reliable and valid data.</p> <p>Recommendations and mitigation measures could therefore be in place, and these would be based on social-scientific evidence. It is also important that SIAs are peer-reviewed. This means that if a study is being carried out by a team of social scientists, this should be scrutinised by other independent social scientists. This could help identify shortcomings, conflicts and possible improvements to the same SIA.</p>	
3	<p>Mark Sammut Ministry for Finance</p> <p>06/12/2019</p>	<p>Below please find MFIN's feedback to some of the points raised during the public consultation:</p> <p>1. Government Fleet Circular - one of the attendees claimed that the vehicle value thresholds are low which automatically disqualify EVs from being eligible. MFIN clarifies that the circular's thresholds apply to ICE vehicles and the circular specifically states that environmental-friendly vehicles would be considered on their own merits. In fact to date, more than 150 EVs and hybrid vehicles have been approved for fleet purposes. MFIN also stresses however that replacement plans of fleets should be sustainable and backed by CBAs and also included in the ministry/department's business plan.</p>	<p>ERA has taken note of this clarification. As also mentioned in the NAPCP, the Government fleet consists of a number of electric or hybrid vehicles. Measure 8.20.1 of the NAPCP aims to continue to increase the number of cleaner vehicles in the government fleet.</p>

		<p>2. Leasing vs Procurement for government fleet – MFIN acknowledges that procurement is favoured over leasing and this due to the fact that CBA simulations confirm the procurement's cost effectiveness over the leasing option. Yet when leasing proves to be more cost effective or appropriate, the leasing option is considered favourably.</p>	<p>Comment has been noted.</p>
		<p>3. Old vs New Tax Regime for Registration Tax (RT) and Annual Circulation Tax (ACT) – during the consultation session, mention was made of possibly eliminating the discrepancy which currently exists. MTIP reaffirmed that one needs to look into other aspects, including the social aspect of introducing such a change. MFIN concurs with this line of thought and this is also reflected on the points MFIN raises during related discussions.</p>	<p>Comment has been noted.</p>
		<p>4. RT for SUVs – one of the attendees remarked that these vehicles should be taxed more than the average vehicles due to their size. MFIN clarifies that one of the variables which is used to determine RT for such M1 category vehicles is the length of the vehicle and consequently SUVs and larger vehicles do pay more RT on the length element when compared to average sized vehicles.</p>	<p>Comment has been noted.</p>
		<p>5. Schemes and Grants – mention was made of possibly extending the scrappage scheme further, raising grants, introduce grants for the conversion of delivery/sales rep fleets to EVs, schemes for businesses which encourage car pooling and car sharing, etc. Currently there are already schemes which cater for environmental considerations such as the various scrappage schemes, electric vehicles grants, bicycle and pedelec grant, bicycle rack grant, EV registration tax exemption, LPG conversion grant, free public transport for students and senior citizens, etc. MFIN is also open to discuss further any other schemes which could be considered as further options to the current schemes.</p>	<p>The NAPCP includes a number of measures focused on schemes and grants to deliver improved results in sustainable mobility and the purchasing of cleaner vehicles.</p> <p>The concept of car-pooling is also mentioned in the NAPCP, however it is aimed at individuals rather than businesses. The latter will be taken into consideration for the upcoming Air Quality Plan.</p>

4	<p>Janina Marie Laurent BirdLife Malta</p> <p>12/12/2019</p>	<p>We welcome Malta’s intentions to reduce air pollutant emissions for the purpose of reaching compliance with the national emission reduction commitments, as set out in Annex II of the National Emission Ceilings (NEC) Directive.</p> <p>Despite the fact that clean air is a basic requirement for human health and well-functioning ecosystems, air quality is globally in a constant decline. In 2012, the World Health Organization identified that 95% of Europeans living in urban environments are exposed to levels of air pollution considered dangerous to human health and about 420,000 premature deaths are known as a result in the European Union.</p> <p>Primary particulate matter (PM), Sulphur dioxide (SO<sub>2</sub>) and Nitrogen oxides (NO<sub>x</sub>) emissions caused by road transport and shipping are of our major concern for Malta. We are aware that some of these pollutants – especially PM - originate from natural sources such as sea salt, soil and sand, however, in the case of natural causes only adaptation measures can be imposed whereas human-induced pollutants can be minimized to a great extent and mitigation measures put into force by the government. In our comments we would mainly like to focus on pollutants heavily emitted from combustion of shipping.</p>	<p>Comment has been noted, background information is factual.</p>
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		<p><b>1. Background</b> Irrespective whether cruise or container ships, ferries, or yachts – ships gather a broad range of fuming smokestacks, which emit a great deal of air pollutants causing damage to our climate, environment and health. The reason for this is that seagoing vessels run on heavy fuel oil, which is highly charged in Sulphur, as well as emits black carbon, heavy metals, fine particulates (primary and secondary), and sulphur dioxide in the air. The sulphur content of marine fuels is currently capped at a maximum of 3.5 per cent (so called „Heavy Fuel Oil“, HFO). This is 3,500 times more than is permitted in the diesel fuel used in cars and trucks (0,001%).</p> <p>In Malta - even though surrounded by sea and highly dependent on shipping traffic - knowledge and awareness on the problems resulting from ship emissions remain widely unknown and action from responsible government authorities is not being taken. Ships, vessels and other types of boats berthing in harbours which are often located in close proximity to dense urban areas, contribute massively to air pollution in these areas. Shipping air pollution can represent up to 40% of all Mediterranean coastal city air pollution. It represents a significant threat to human health, environment and climate. As pollutants are carried over long distances, it is not only the inhabitants of littoral zones but also the populations in inland regions, who are subject to respiratory issues as well as inflammations and cardiovascular diseases.</p> <p>Recent study results published by the Department of Geosciences of the University of Malta, show the extent of air pollution caused by ships around the Maltese island. Atmospheric physicist Prof. Raymond Ellul and his team have assessed an area of 200km by 200km around Malta with 1,774,448 ship data points, showing 84,500 ship movements which were detected in the area in 2015</p>	<p>Comment has been noted. The scope of the National Emission Ceilings Directive is limited to national maritime traffic, and therefore does not cover international shipping such as cruise liner activities. However, this does not mean that ERA is underestimating the impact that international shipping has on Malta’s air quality. In this regard, ERA will be carrying out an air quality study downwind of the Grand Harbour to better understand the impacts of cruise liners on local air quality.</p> <p>With regard to the sulphur content in the heavy fuel oil, the International Maritime Organisation (IMO) has decreased the maximum permitted level of sulphur content in the fuel from 3.5% to 0.5%, applicable as from 1 January 2020.</p>
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		<p>alone. Prof. Ellul highlights the problem of air pollution from ships in Malta, stating, “One big tanker that passes by has an engine of about 80 megawatts. A Maltese power station outputs a maximum of 450 megawatts. So a tanker is a fifth of that. But we get 200 ships of that size passing by Malta like that going through every day! It’s like having a couple of hundred mini-power stations going past every day,’ emitting sulphur dioxide and everything else a power station would emit” (THINK Magazine 2017). More detailed and technical information highlights that Malta is suffering 50.9 kilotonnes of nitrous oxide, 30.3 kilotonnes of sulphur dioxide, 3 kilotonnes of carbon monoxide, along with a 2080 kilotonnes of carbon dioxide. If the numbers are compared to emissions from cars, they equal nitrous oxide emitted from 4.1 billion cars, sulphur dioxide from 1,515 billion cars and carbon dioxide from 365.000 cars (comparison to average value of a car with emission standard Euro 4 in 2012).</p>	
		<p>Running engines of ships contribute considerably to emissions of sulphur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM). The latter includes soot emissions (black carbon) which are in particular harmful to health and climate. NO<sub>x</sub> emissions diminish the function of the lungs and increase the risk of cardiovascular disease. NO<sub>x</sub> is also a powerful greenhouse gas causing climate warming due to its contribution in the formation of ozone (O<sub>3</sub>). High concentrations of O<sub>3</sub> in cities are responsible for the death of elderly people and people with poor health conditions. Emissions of sulphur oxides such as sulphur dioxide (SO<sub>2</sub>) are harmful for our environment, not least because it causes acid rain which leads to the eutrophication of soils and coastal areas and it damages buildings and structures, particularly those made of limestone. Air pollutant emissions are furthermore responsible for a significant loss of productivity in agriculture and have a negative impact on biodiversity.</p>	<p>Comment has been noted, information is factual.</p>



		<p>Countries that are facing the same problem – including Northern European countries, the USA, Canada and China - took action to reduce the pollution caused by ships in their territorial waters. Air pollution from ship traffic in the Mediterranean Sea can be significantly reduced by the introduction of an Emission Control Area (ECA). A recent impact assessment by the French Government, which started in 2017, investigated potential air quality improvements in the region following a switch to better grade marine fuels as well as the related socio-economic benefits of reduced health costs and environmental damage obtainable by the designation of an ECA in the Mediterranean Sea. The key finding is that the region would benefit most from a combined Sulphur Emission Control Area (SECA) and Nitrogen Emission Control Area (NECA). SO<sub>2</sub> would be reduced by 77% and in port areas even by 100%. NO<sub>2</sub> would decline by up to 76% in coastal areas and the east of the Mediterranean Sea. The annual mean of particulate matter (PM2.5) would go down by 15 to 20%. Shipping emissions cause 50,000 premature deaths per year in Europe and cost €60 billion just in health costs per year in the European Union (EU). In the Mediterranean region only, about 6,000 premature deaths could be avoided due to the reduction of the particle pollution.</p>	<p>Comment has been noted. ERA is aware of these studies and will be conducting a study in 2020 in Senglea, closer to the area of influence of international shipping, to better understand the impact of shipping on ambient air quality.</p>
		<p>Declaring the Mediterranean Sea as an Emission Control Area is one of the many existing solutions. Beside political measures, governments and private port authorities can implement technical and infrastructural measures, which address the issue of air pollution from ships directly. In July 2017, the European Commission published a study on port infrastructure to promote environmentally friendly maritime transport activities and sustainable transportation. The study highlights best-practice examples from various ports worldwide, benefits and costs, including the economic aspect and environmental potential of</p>	<p>Comment has been noted.</p>

	<p>certain schemes and guidelines to equip other ports on how these practices can be developed in their respective countries.</p>	
	<p>2. Recommendations We urge our national government to support the designation of the Mediterranean Sea as a combined SECA and NECA by 2020 and recommend to put a strong focus on the reduction of air pollutants emitted from ships into Malta's National Air Pollution Control Programme. Suitable measures have to be identified and implemented to reduce the air pollution from ships in Malta and the Mediterranean to create less damage to our environment and health.</p>	<p>Malta is participating in the respective negotiations on the designation of a SECA in the Mediterranean Sea.</p>
	<p>Suitable measures for Malta for cleaning and greening the shipping sector could include for instance:</p> <ul style="list-style-type: none"> <li>• Political measures: reduction of sulphur dioxide and nitrogen dioxide emissions by establishing a so-called emission control areas (ECAs) in territorial waters – ideally including Hurd's Bank. A maximum value for sulphur content could be 0.1 percent, compared to a current 3.5%. Another idea would be the creation of a national tailor-made policy framework on shipping emissions</li> </ul>	<p>Comment has been noted. Malta is participating in the respective negotiations on the designation of a SECA in the Mediterranean Sea.</p>
	<ul style="list-style-type: none"> <li>• Technical measures: promote (1) the installation of diesel particulate filters (DPF) on all (cruise) ships and ferries berthing and shipping in Malta, which reduce soot emissions almost completely; (2) install selective catalytic reduction systems (SCRs) which can eliminate most of the NOx from ships exhaust fumes; and (3) closed-loop seawater scrubbers and port facilities to cater for toxic waste</li> </ul>	<p>Comment has been noted.</p>

		<ul style="list-style-type: none"> <li>• Infrastructural measures: provision of a power supply for electric ferries (e.g. Gozo Channel, Birgu – Valletta – Sliema connection); suitable for Malta but tackling emissions from cars at the Gozo terminal would be the installation of roof shading structures for cars and mandatory switched-off engines</li> </ul>	<p>Comment has been noted and will be discussed further with the relevant authorities.</p>
		<ul style="list-style-type: none"> <li>• Voluntary measures for ports and ship owners: air pollution reduction measures can be introduced, such as ecological port fees (ships pay their port fees depending on environmental performance, including their respective emission balance, creating incentives for ship operators to invest in clean technologies); own incentive programs for ships that go beyond the legal requirements can be promoted, such as the “Green Ship Program” that rewards ships with cleaner engines per call, greening national sea transport including ferries and local ship transport by installing technical measures (see above) on these ships (these could also be useful to promote/increase sea transport in Malta to reduce air pollution from cars)</li> </ul>	<p>Comment has been noted and will be discussed further with the relevant authorities.</p>
		<p>3. Further information:  ECAMED: a Technical Feasibility Study for the Implementation of an Emission Control Area (ECA) in the Mediterranean Seas (2019): <a href="https://www.ecologique-solidaire.gouv.fr/sites/default/files/R_DRC-19-168862-00408A_ECAMED_final_Report_V5.pdf">https://www.ecologique-solidaire.gouv.fr/sites/default/files/R_DRC-19-168862-00408A_ECAMED_final_Report_V5.pdf</a></p> <p>Position Paper: Emission Control Area (ECA) for the Mediterranean Sea - Effective measure to tackle air pollution from ships (2018): <a href="https://birdlifemalta.org/wp-content/uploads/2019/01/NGOs-backgroundpaper-on-the-MedECA.pdf">https://birdlifemalta.org/wp-content/uploads/2019/01/NGOs-backgroundpaper-on-the-MedECA.pdf</a></p>	<p>Information has been noted. ERA is aware of the relevant studies.</p>

		<p>THINK Magazine (2017), Issue 20: Stuck in the middle with the fumes, University of Malta.  <a href="https://www.um.edu.mt/think/stuck-in-the-middle-with-the-fumes/">https://www.um.edu.mt/think/stuck-in-the-middle-with-the-fumes/</a></p> <p>BirdLife Malta's Together against Air Pollution from Ships project:  <a href="https://birdlifemalta.org/conservation/current-projects/together-air-pollution-ships">https://birdlifemalta.org/conservation/current-projects/together-air-pollution-ships</a></p>	
5	<p>Jim Wightman  Malta Road Safety Council    13/12/2019</p>	<p>The document Malta's National Air Pollution Control Programme 2019 refers to cycling in three areas sections 8.5, 8.8 and 8.12.</p> <p>Referring to section 8.8 National Air Pollution Control Programme, the national cycling policy (NCS) under the National Transport Strategy and Master Plan 2025 this has indeed been released for public consultation, behind schedule, point 2.2.4 (NTS&amp;MP) develop a NCS was supposed to commence in 2016 and complete by 2017, and is therefore very much overdue already by the consultation phase, in late 2018, and has to date still to be published.</p>	<p>This comment has been noted and will be referred to the relevant authorities.</p>
		<p>In addition only the policy portion of the NCP was open to consultation and not the actual technical infrastructural specifications. Without these it cannot be said that the complete policy was opened for consultation. Point 2.2.2.4 (NTS&amp;MP) Develop a cycling strategy focusing on the hub, was supposed to commence in 2016 and complete by 2017 as part of the SUMP process is completely absent. Point 2.4.2.5 (NTS&amp;MP) Provide and regulate space for bicycles, under the development of transport hubs to encourage intramodality (2.4.2), was supposed to commence in 2017 and complete by 2021, and this should have seen a number of positive interventions but most have been quite negative and even the goals set have not been reached;</p>	<p>This comment has been noted and will be referred to the relevant authorities.</p>

		<ul style="list-style-type: none"> <li>a. Reduced the total amount of cycle lanes and protected segregated lanes, while using inappropriate methodologies to segregate speed differentiated traffic (see also the note about Kappara below) and selects lifts (which do not accept bicycle lengths, see photo of Mriehel lift) and bridges instead of easier direct straight-through (not serpentine) underpasses for instance.</li> <li>b. Placed 'new' 'cycle lanes' in areas where there is space but are unconnected to any other cycling routes, and clearly failed to use big data such as 'Strava Metro' *to determine where such lanes would be most effective.</li> <li>c. Resulted in a reduced level of protection to vulnerable road users.</li> <li>d. Is consistently behind schedule.</li> <li>e. Fails to meet stakeholders needs or that of the state with regards to National Air Pollution Control Programme as cycling levels are growing exponentially (better than EV's and hybrids together) but remain depressed as a modal share while they are out striped by car ownership and particularly larger SUV's which cancel out the positive benefits of EV growth and cycling combined.</li> <li>f. Failed to reach the 2% modal share target suggested in the D-AIR project, due to poor policy decisions and infrastructural interventions.</li> </ul>	
		<p>8.15 of Malta's National Air Pollution Control Programme refers to improvements by Infrastructure Malta linked to the NTS&amp;MP. Unfortunately there is a fundamental error in the failure of the regulator Transport Malta to 'get on with' the ministries own separate entity Infrastructure Malta, and for the latter to engage in meaningful dialogue with stakeholders, in some cases as noted above this resulted in quite dangerous infrastructure being placed in the way of the general public. Infrastructure Malta has also stated publicly things which stakeholders like the BAG have never</p>	<p>This comment has been noted and will be referred to the relevant authorities.</p>

		<p>agreed to or suggested. There is also a 'rush factor' of making the most expedient quick fix solution that ensure that built infrastructure deadlines are kept ensuring full EU funding.</p> <p>The most glaring example of this was the contemplation of the Kappara junction project without cycle lanes, despite the obvious fact that many cyclists used the route to/from university given that there was 'contingency space' in the form of a tarmacked verge/hard shoulder and the obvious continuation from the Coast Road as a route. The single sided cycle lane was only envisaged after the suggestion by the BAG to include cycle friendly minor roads off the scheme. This was rushed into the project in the space of almost 48Hrs and enabled planners to encroach more of the valley than previously planned under the guise of a bike lane. This bikewash process saw the introduction of a lane that could not be two way over its entire length connecting university, creating enough space for 2 car lanes next to the singled cycle lane portion on one side of Kappara. The opposite side was the site of the only cycling fatality in that year, of a cycle commuter from the Coast road. The Kappara cycle lane still remains to this day unconnected to the university and can only be used by fearless riders brave enough to use the roundabouts at either end and ride the 300m slip lane. It is a glaring example of both bikewash and how the 'cycle lanes where there is space' policy has failed. Similarly Mohammed Bharket was killed on HalFar Road where the cycle lane is one way and could not be reached by Bharket, who had to cycle 300m against traffic to reach it, to cycle wrong way and again against traffic to leave it.</p>	
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		<p>National Air Pollution Control Programme section 8.12 refers to safe cycling corridors as part of the SMITHS project, see photo montages attached. These again are described in 2.2.2.5 (NTS&amp;MP) to develop pilot cycle corridors, were supposed to commence in 2016 and complete by 2020. However again these were not subject to public or more importantly stakeholder consultation by the Italian firm contracted to draw them up and contain a significant number of errors, and impractical design features. Such routes should be given criteria such as Comfort, Efficiency, Security and Ease of Use especially by novice riders. Safe routes as dictated in section 8.5 (NAPCP) should be a given, not something new. The slogan safe roads for everyone should already embody this.</p>	<p>This comment has been noted and will be referred to the relevant authorities.</p>
		<p>Clearly to place non-polluting cycle lanes where they will not be used, and importantly not alongside polluting car routes for fear of losing car space, will not address or transfer polluting car trips to non-polluting bicycle trips. It is therefore very important that Malta's National Air Pollution Control Programme 2019 takes a controlling and accountable approach to *to determine where such lanes would be most effective, in reducing pollution by increasing bicycle use over car use. Importantly the current trend to rely on vehicular cycling will not see cycling uptake grow beyond 2%, of dedicated fearless riders. To encourage general commuting cycling these routes should be prioritized, segregated, efficient and comfortable, that non cyclists are willing to get on a bicycle and use. The removal of car parking, disincentivizes car use and at the same time frees up dead vehicle space to moving active transport space and should be, strongly encouraged.</p>	<p>This comment has been noted and will be referred to the relevant authorities.</p>
		<p>To sum up, the National Air Pollution Control Programme 2019 should promote pollution free cycling by addressing the deviation from the reality of cycle commuting by;</p>	<p>This comment has been noted and will be referred to the relevant authorities.</p>

		<ul style="list-style-type: none"> <li>• Expedite the publication of the National Cycling Policy including the actual technical infrastructural specifications, and revise its (the NAPCP) text accordingly.</li> <li>• Observe that the number and quality of cycle lanes has been reduced not increased (note many of these are also one way or single sided, sharrow markings are signage not cycle lanes in themselves).</li> <li>• Observe that protected segregated lanes are better and that their placement needs to be appropriate and effective rather than convenient (cycle lanes where there's space).</li> <li>• Methodologies need to be bicycle friendly and big data based.</li> <li>• Make failures in deadlines and effective provision accountable.</li> <li>• Set a goal of increased cycling uptake of 10% modal share by 2025.</li> <li>• Resolve the breach between Infrastructure Malta and Transport Malta.</li> <li>• Address dangerous and below specification (it is suggested in 2020 that the Dutch CROW standards are used) infra and set goals to upgrade single sided and 6KPH shared paths.</li> <li>• Revise the plans for the SMITHS project safe cycling corridors with stakeholders.</li> <li>• Base cycling and walking infra on Comfort, Efficiency, Security and Ease of Use.</li> <li>• Prioritize non-polluting cycle lanes over parking and polluting car routes (such as the planned flyovers in Msida and parking lanes in Tower Road)</li> <li>• Move away from vehicular cycling to segregated cycling to encourage general commuting by bicycle.</li> </ul>	
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6	<p>Mary Camilleri Mgarr Farmers Cooperative Society Ltd</p> <p>23/12/2019</p>	<p>We noted that within the agriculture sections in the Malta's National Air Pollution Control Programme there is continuous reference to the Maltese Code for Good Agricultural Practice (2001). This directive is already in place and it's useless to provide feedback on it; during the consultation stage we were not given enough time to go through it and submit our suggestions and comments.</p>	<p>ERA is informed that the Maltese Code for Good Agricultural Practice is being revised. However, it is not envisaged that the agriculture section in the "With Additional Measures" section of the NAPCP will be affected by the CoGAP since the listed measures derive from a different plan, National Agricultural Policy for the Maltese Islands (2018 – 2028).</p> <p>With respect to consultation timelines, the NAPCP was available for public consultation for a duration of 7 weeks, which is in line with the requirements of the Environment Protection Act (Cap. 549).</p>
7	<p>Nicoletta Moss Debono Group</p> <p>13/01/2020</p>	<p>Thank you for setting up the National Air Pollution Control Programme.</p> <p>As transport is one of the main issues of CO<sub>x</sub> pollution all our comments and suggestions will be around mobility.</p> <p>Vehicle:</p> <ul style="list-style-type: none"> <li>• Facilitate the change from internal combustion engines to alternative sources of energy: Tax what you don't want, subsidies the preferred option (Compare to Norwegian legislation)</li> <li>• Electrification of the fleet through incentives</li> <li>• End of the 2-tier taxation system (lower tax for older cars)</li> <li>• Limit access to certain areas of cities for cars with old engines / Diesel trucks (According to EURO 3-6)</li> <li>• Pedestrian zones: Make certain areas car free (except for last mile deliveries, which should be limited to a certain time of the day)</li> <li>• Charge for congestion / emissions</li> </ul>	<p>CO<sub>2</sub> emissions do not fall within the scope of the NAPCP, and are being targeted by the National Energy and Climate Plan (NECP) coordinated by the Energy and Water Agency (EWA).</p> <p>However, there are synergies between the NAPCP and the NECP since both plans largely include similar measures and actions to reduce air pollutant emissions. Some of the measures being suggested are already included in the NAPCP, such as incentives for electrification of the fleet (Measure 8.20) and the study of the introduction of a low emission zone (Measure 8.7). The remaining measures will be discussed further with the relevant authorities.</p>

		<ul style="list-style-type: none"> <li>Facilitate the introduction of Autonomous Vehicles</li> <li>Hydrogen trial</li> </ul>	
		<p>Other modes of transportation</p> <ul style="list-style-type: none"> <li>Incentivize sharing of rides/vehicles as this will bring down congestion and fleet</li> <li>One vehicle should be able to be used for different purposes (taxi, rental, deliveries etc. according to demand rather than forced by the number plate)</li> <li>Subsidies not only for projects from Transport Malta or Malta Public Transport, but also for initiatives from other entities</li> </ul>	<p>Car-sharing and sustainable delivery services (Measures 8.6, 8.10) are included in the NAPCP. The third point will be discussed with the relevant authorities.</p>
		<p>Infrastructure</p> <ul style="list-style-type: none"> <li>Reducing parking areas and planting trees instead, or alternatively put up underground parking and add on top a green recreation area for the public (as it was suggested in the Cottonera)</li> <li>Add bike lanes and pedestrian walkways to make walking and bicycling easier (if possible add trees, so people can move in the shade)</li> </ul>	<p>As outlined in the NAPCP, improvement of cycling infrastructure is being implemented through the National Cycling Strategy. The first point will be discussed with the relevant authorities.</p>
		<p>Other:</p> <ul style="list-style-type: none"> <li>Subsidize and support companies who set up a Green Mobility Plan for their employees</li> </ul>	<p>The NAPCP already includes a measure which states that a Green Travel Plan is being put together for the Ministry for Infrastructure, Transport and Capital Projects (MTIP) as a pilot project (Measure 8.4), to later implement similar initiatives in other Ministries. This can be extended to private companies.</p>
8	<p>Nicole Klaesener-Metzner Project Aegle Foundation</p> <p>15/01/2020</p>	<p>As a foundation focussing its intervention on the topic of sustainable mobility we will focus our comments on mobility and the resulting emissions in general: Proposed:</p> <ul style="list-style-type: none"> <li>Subsidise and support companies, which implement a Green Travel Plan (reducing emissions from commutes)</li> </ul>	<p>Most of the suggested measures are already included in the NAPCP. The remaining suggestions will be discussed further with the relevant authorities.</p> <p>With regards the suggestion on the publication of air quality data, ERA is currently working on an air</p>

		<ul style="list-style-type: none"> <li>• Incentivise sharing of rides/vehicles as this will bring down congestion and number of vehicles</li> <li>• Allow multiple use of vehicles as taxi/delivery/private</li> <li>• Facilitate the change from internal combustion engines to alternative sources of energy</li> <li>• End of the 2-tier taxation system (lower tax for older cars)</li> <li>• Limit access to certain areas of cities for cars with old engines / Diesel trucks (According to EURO 3-6)</li> <li>• Pedestrianise village cores (car free zones)</li> <li>• Paid parking to disincentivize car use in general</li> <li>• Increase construction of appropriate active travel infrastructure (sidewalks and bike lanes)</li> <li>• Incentivise the use of alternatives to the car per community (competition for the village with the cleanest air)</li> <li>• Publication of air quality data in a way the general public understands it easily so behaviour change is motivated</li> </ul>	quality index which will be displaying information on the status of air quality in a way that can be more readily understood by the general public.
9	<p>Laura Jasenaite Cool Ride-Pooling</p> <p>23/01/2020</p>	<p>As representatives of the transport sector, we provide suggestions related to transport only. The transport sector is one of the leading causes of air pollution, and unfortunately, NOx emissions from the road transport sector have not been reduced between 2005 and 2017.</p> <p>The following recommendations are suggested:</p> <ul style="list-style-type: none"> <li>• Vehicles fueled by alternative energy sources:</li> <li>• Electrification of the fleet</li> <li>• Development of EV charging network</li> <li>• Introduction of hydrogen vehicles</li> <li>• Facilitate the trial of autonomous vehicles</li> <li>• Incentives the purchase of cars with alternative sources of energy through subsidies or existing scrappage scheme</li> </ul>	Some of the recommendations are already included in the NAPCP, however the other recommendations have been noted and will be discussed further with the relevant authorities.

		<ul style="list-style-type: none"> <li>• Disincentives for old and high polluting vehicles such as ending the 2-tier taxation system (lower tax for older cars), limiting access to residential neighbourhoods for vehicles with old engines/diesel trucks (according to EURO 3-6)</li> <li>• Pedestrianise certain areas</li> <li>• Tax emissions</li> </ul>	
		<p>Alternative modes of transportation:</p> <ul style="list-style-type: none"> <li>• Promote shared vehicles to reduce car ownership (car-sharing and bike-sharing schemes)</li> <li>• Incentivise carpooling to reduce the share of single-occupancy trips in rush hours (one person per car). It could be achieved by providing tax incentives to corporates to use shared public transportation instead of private vehicles</li> <li>• To enable the use of the same fleet across multiple services such as ride-hailing, deliveries and car-sharing. The same fleet can service different purposes during different hours reducing the fleet and the need for parking spaces (at the moment Y plate can only be used to carry passengers, CSH for car-sharing)</li> <li>• Incentives for the public to use alternative mobility options rather than owned vehicle. An idea would be to issue a mobility wallet for the public with monthly funds that can be used for transport. Different social groups would be receiving different funds. This wallet could also incentivise people to scrap their car and use only alternative modes of transport.</li> </ul>	<p>Some of the recommendations are already included in the NAPCP, however the other recommendations have been noted and will be discussed further with the relevant authorities.</p>

		<p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Build a network of bike lanes to incentivise the use of traditional and electric bikes, kick scooters and electric mopeds</li> <li>• Monetise parking in highly populated areas</li> </ul>	Some of the recommendations are already included in the NAPCP, however the other recommendations have been noted and will be discussed further with the relevant authorities.
10	<p>Michelle Borg Planning Authority</p> <p>24/01/2020</p>	Further to the public consultation process concerning the subject in caption, the Planning Authority takes note of the proposed measures included in the draft NECD National Air Pollution Control Programme. Considering that a number of the measures are influenced by their spatial context, the PA looks forward to future consultations with ERA and relevant authorities, to support their implementation where relevant.	Comment has been noted.
11	<p>Ralph Cassar Alternattiva Demokratika</p> <p>24/01/2020</p>	<p>Alternattiva Demokratika notes that the National Air Pollution Control Programme (NAPCP), for which public consultation closes today, fails to call for the implementation of effective measures to reduce substantially dangerous emissions from vehicles, namely NOx (nitrogen oxides).</p> <p>The main effects of NOx is the increased likelihood of respiratory problems, especially in children and older people. NOx inflames the lining of the lungs, and it can reduce immunity to lung infections. This can cause problems such as bronchitis. This pollutant can also cause more frequent and more intense asthma attacks.</p> <p>While the NAPCP on page 44, table 2 says that in the scenario "with measures" Malta will emit a total of 4.9 kt of NOx when the limits are only 2 kt. With so called "additional measures" proposed in the draft action plan emissions go down marginally to 4.5kt (page 68). This is unacceptable.</p>	<p>Air pollution remains one of ERA's major concerns and it is not the intention to minimise the issue. ERA has always been consistent in stating that the major source of air pollution in urban areas is road traffic. This is confirmed by data emanating from the air quality monitoring stations managed by the Authority.</p> <p>It should be acknowledged that there have been improvements in the past years, both in terms of tonnes of pollutant emissions per year and in ambient air pollutant concentrations due to the overall reform of the power generation sector. The reform of the public transport system has also achieved results, whilst Malta has also made progress in the implementation of a number of sustainable mobility measures. Of course, more needs to be done in this area, as the NAPCP itself explains and acknowledges.</p>

		<p>ERA and the Ministry should come up with a revised plan which will achieve the 2 kt NO<sub>x</sub> target. On page 49 of the document, it is stated that so called 'low emission zones' in congested and polluted roads will only 'be studied'. The time for just studying things when it comes to pollution should have long been over. We demand the implementation of low emission zones which restrict the access of vehicles to polluted areas and the implementation of other effective measures to tackle pollution from vehicles.</p> <p>It is imperative that pollution from road transport as a major contributor of NO<sub>x</sub> emissions (41.7% in 2030) is tackled effectively.</p> <p>Failure to take effective measures mean a breach of Directive 2016/2284. The aims of this Directive as explained in recital 27, states clearly that citizens of EU member states have a right to expect that member state governments comply to the directive since non-compliance has a direct effect on their health.</p> <p>Note:      Directive 2016/2284 Recital 27: <i>"The aim of this Directive, inter alia, is to protect human health. As the Court of Justice has pointed out on numerous occasions, it would be incompatible with the binding effect which the third paragraph of Article 288 of the Treaty on the Functioning of the European Union (TFEU) ascribes to a directive to exclude, in principle, the possibility of an obligation imposed by a directive from being relied on by persons concerned. That consideration applies particularly in respect of a directive which has the objective of controlling and reducing atmospheric pollution and which is designed, therefore, to protect human health."</i></p>	<p>Here, a comparison of NO<sub>x</sub> emissions for two emission scenarios is being made, which are compared with Malta's emission ceiling for this pollutant. Whilst this comparison is correct, it is to be noted that this ceiling is to be reached by 2030. Emission projections for 2020 show that Malta will not have difficulty in reaching the 2020 ceilings, however more effort is needed to reach our 2030 targets; this is why solid air quality policy, accompanied with relevant studies are both important to deliver the required results.</p> <p>With regards the comment on LEZs, it would not be wise to implement a low emission zone without first studying various options on how it can be implemented to achieve the required environmental benefits. As the NAPCP explains, the study will look at the different options available to Malta and Gozo, and to assess which ones would deliver the desired results swiftly. The study would also assess the size of a feasible LEZ within the already identified potential zones to achieve the greatest positive impact to the environment, with the greatest benefit to citizens' everyday lives.</p> <p>The priority is to make LEZ a successful system and thus the requirement to attract the citizens' confidence that this scheme is beneficial on all fronts and to avoid failure and distrust, with the ultimate aim to induce a long-term (especially commuter) behavioural change of how people get to-and-from congested areas, which would</p>
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			lead to cleaner air throughout the Maltese islands.
12	Claire Bonello Futur Ambjent Wiehed  24/01/2020	<p>The document submitted for public consultation is disappointing and shows a lack of readiness to address air quality problems and issues - especially caused by road transport, ever-increasing personal vehicle use and the relentless increase in highway capacity.</p> <p>Particular reference is being made to Nitrogen Oxides emissions from vehicles. "The NAPCP on page 44, table 2 says that in the scenario "with measures" Malta will emit a total of 4.9kt of NOx when the limits are only 2kt. With so called "additional measures" proposed in the draft action plan emissions go down marginally to 4.5kt (page 68).</p> <p>Why is this being taken so lightly, with no real and effective attempts to address the situation? A genuine commitment has to be made towards sustainable transport such as walking and cycling and of encouraging public transport whilst discouraging personal vehicle use.</p> <p>Instead, the document presented for consultation continues to present "greenwash" measures which fall short in several respects and do not address the real problems with regards to deteriorating air quality and not ever really addressing traffic and transport issues which are inextricably linked to air quality.</p> <p>The following are some of the ineffectual measures in the document presented for public consultation:</p>	Here, a comparison of NO <sub>x</sub> emissions for two emission scenarios is being made, which are compared with Malta's emission ceiling for this pollutant. Whilst this comparison is correct, it is to be noted that this ceiling is to be reached by 2030. Emission projections show that Malta will not have difficulty in reaching the 2020 ceilings, however more effort is needed to reach our 2030 targets; this is why solid air quality policy, accompanied with relevant studies are both important to deliver the required results.

		<p><b>1. Incentivising measures such as Green Travel Plans.</b></p> <p>A GTP is currently only mandatory in the case of high rise and intensive developments. It is a soft (useless) unenforceable measure - usually consisting of ineffectual measures such as printing pamphlets indicating bus routes, allocating a couple of showers for cyclists. In one case – where the development in question was going to generate an obscene amount of traffic - the suggestion was to provide vouchers for sports wear. It is not clear how providing sportswear will alleviate traffic. It is submitted that road safety is a more pertinent consideration for cyclists and pedestrians than having subsidized running gear.</p> <p>Moreover GTPs are merely monitored - there is practically no way of ensuring that they have met their traffic mitigation targets. If they don't, the traffic-inducing development would long have been in operation and everybody is all the worse off for it. The GTP is merely a sop to alleviate concerns at the time of the Planning application. It is ineffective, unenforceable and useless.</p>	<p>Comment has been noted. It is recognized that this is a soft measure, however it is to be acknowledged that it is not applied in locations experiencing severe increase in traffic. The NAPCP includes other concrete measures (such as the study on the LEZ). The fact that these GTPs are not enforceable does not mean that they cannot be applied in situ. Green Travel Plans should not be considered as useless: but rather to raise awareness.</p> <p>Having said so, Green Travel Plans are not only being suggested for new developments. As stated in the NAPCP, a Green Travel Plan is being put together for the Ministry for Infrastructure, Transport and Capital Projects (MTIP) as a pilot project, to later implement similar initiatives in other Ministries.</p>
		<p><b>2. Encouraging cycling and walking.</b></p> <p>The document presented for consultation makes a lot out of the financial incentives for cycling. Whilst this is a step in the right direction, it is not enough. The major obstacle to wider cycling uptake and walking is the dangerous and inaccessible infrastructure and roads. Ironically this is exacerbated by a government agency - namely Infrastructure Malta which has obstinately persisted in its road widening spree, increasing highway capacity in total disregard of sustainable transport principles as well as the National Transport Masterplan which advocates:</p> <p><i>"In Malta, several sections of the conventional strategic roads pass through busy urban areas which act as bottlenecks. Here it is difficult to increase road capacities for motor vehicles by road</i></p>	<p>Comment has been noted and will be referred to the relevant authorities.</p>



		<p><i>widening or new road building, so the general approach will be to increase road capacities through measures to enhance numbers of travellers passing through the link rather than the number of vehicles.” (NTM, page 132)</i></p>	
		<p>Particular reference is being made to the Central Link Project where a totally retrograde highway increase of capacity was not coupled with sufficient measures to improve the modal shift and sustainable transport options.</p> <p>The PDS for this project identified a number of social impacts of the project, some with a direct impact on accessibility and mobility, whilst others having a direct link to public health (beyond those related to emissions). The scheme shows a reduction in the number of pelican crossings (from 14 to 9) along the southern and northern sections of Attard. According to the PDS, apart from the social implications associated with reduced accessibility and social exclusion, there will be severance experienced by the Attard community living in proximity of the scheme... “The reduction in pedestrian crossings and the increased vehicular speed will act as a deterrent for those unable to drive as it will most likely discourage walking.”</p> <p>Noise and air pollution were also mentioned as likely impacts of increased traffic and increased speed at various locations along the road section. Nevertheless - despite these issues being highlighted and the cycling advocacy group expressing its concerns at the inadequate, unsafe cycling infrastructure provided, ERA gave its approval for the project. This - despite the fact that ERA acknowledged that there is clear evidence that widening roads rapidly fill with induced traffic (Maltatoday 2nd June 2019). If the environmental authority fails to stand firm against such a large project which will augment and encourage</p>	<p>Comments have been noted. However, the NAPCP is focused at a national strategic level rather than on specific cases. Individual cases are addressed through Environmental Impact Assessments or other assessment procedures.</p>

		<p>personal vehicle use to the detriment of other modes of transport, what hope is there?  The excuse that this is the implementation of the TEN-T network as per the relevant legislation is just an excuse - both the regulation, the National Transport Plan and the Local Plan militate against the predict and provide approach assumed by Infrastructure Malta and prioritise safe, integrated multi-modal transport modes.  The issue of safety is of paramount importance to encourage sustainable modes of transport. In this respect, the mandatory requirements of road safety audits even at the conceptual stage, should be observed. Unfortunately – they are not – a case in point is the Tal-Balal Road. It is far more difficult if not impossible to address road safety issues when the project has been completed and road users simply have to risk their lives because of the developer’s failings and the authorities’ lack of scrutiny.</p>	
		<p><b>3. Pilot cycling corridors</b>  Mention is made of this proposal. It is noted that whilst these pro-cycling measures remain at "pilot" stage, or are localised in nature, massive infrastructural projects which incentivise personal vehicle use are actually implemented. The Central Link is a case in point . The Malta-Gozo tunnel is another massive project which is more imminent than a nation-wide cycling network and pedestrian pathway.</p>	<p>Comment has been noted and will be referred to the relevant authorities.</p>
		<p><b>4. Public Transport improvement and quality corridors</b>  The rise in the number of public transport and bus users is cited as a certification that things are improving on this front. There is no recognition of the fact that this is also due to the increase in population, and that the increase in bus patronage is not proportionate to the increase in personal vehicle take up.  It is not clear what is meant by "quality corridors". The concept of Strategic Bus Corridors and Bus Selection technology has been required since 2006 in the Local Plans - yet it has been totally and</p>	<p>Comment has been noted and will be referred to the relevant authorities.</p>

		<p>utterly disregarded and dismissed. Again - a particular case in point - the Central Link Project - where the mandatory Local Plan requirement was ignored and instead bus laybys were introduced. These are no substitute to Strategic Bus Corridors as buses encounter delays when exiting laybys as oncoming traffic does not let up to allow the buses to exit. There was no enforcement of this mandatory Local Plan requirement (one also found in the NTM). It is not understood how the vague notion of "quality" corridors will fare better.</p>	
		<p><b>5. Refusal to implement low emission zones as soon as possible</b>  This is a scandalous renegation of responsibility for air quality deterioration. Only a vague reference to carrying out a "study" is indicated in the document. No time frames are included, no real commitment to do anything concrete about this effective measure of introducing low emission zones.  This - despite the fact that creating disincentives for personal vehicular traffic has been found to work in altering public behaviour. A case in point is the 10% shift from car to bus when the Valletta road pricing scheme (CVA) was introduced in 2007. Ten per cent of car trips to Valletta recorded in the 1998 Household Travel Survey shifted to bus in the 2010 Household Travel Survey as a result of reduced circulation and parking due to pedestrianisation in the commercial centre, parking management and introduction of a pay-as-you go charge for access into the City.</p>	<p>Solid air quality policy, accompanied with relevant studies are both important to deliver the required results, that of improved air quality. It is therefore important to first study the various options on how a Low Emission Zone can be implemented for it to achieve the required environmental benefits. As the NAPCP explains, the study will look at the different options available to Malta and Gozo, and to assess which ones would deliver the desired results swiftly. The study would also assess the size of a feasible LEZ within the already identified potential zones to achieve the greatest positive impact to the environment, within the greatest benefit to citizens' everyday lives.</p> <p>The priority is to make the LEZ a successful system, with the ultimate aim to induce a long-term (especially commuter) behavioural change of how people get to-and-from congested areas.</p>

		<p><b>6. Incentivising renewable energy sources</b></p> <p>Again - any measures in this regard will be ineffective unless a legal regime of solar access rights and easements is introduced and enforced. What is the point of incentivising solar energy if high rise developments limit or stop access to solar energy?</p> <p>In view of the above the document presented for consultation does not provide any solutions or efficacy and will not address Malta's air quality issues.</p>	<p>Comment has been noted and will be referred to the relevant authorities.</p>
<p><b>Submissions Made During Consultation Meeting held on 3/12/2019</b></p>			
1	<p>Anonymous</p> <p>03/12/2019</p>	<p>Recently an article was published which stated that cruise liners emit as much air pollutants as small cities. However, there is no reference to cruise liners in the presentation. Does this mean that they are not being considered, or does it mean that they don't emit as much as claimed?</p>	<p>The National Emissions Ceilings (NEC) Directive covers internal navigation, i.e. maritime activities involving ships which depart and arrive in local harbours, such as the Gozo Channel, fishing vessels and recreational vessels. Therefore, international cruises are not covered by the Directive and not included in the NAPCP.</p> <p>This does not mean that cruise liners do not affect local air quality. A local peer-reviewed study, carried out at the Msida Air Monitoring Station on PM<sub>2.5</sub> found that international cruise liners were responsible for 5% of emissions in 2016, while road transport was responsible for 27%. Visual air pollution emitted from cruise liners does not necessarily mean that they are having a substantial impact on local air quality, since meteorological parameters are an important consideration in the process. In this regard, road transport is being targeted as the major source and therefore a major priority.</p>

			Since the Msida Station is not in the main path of emissions from cruise liners from the cruise port, ERA will be conducting a study in 2020 closer to Senglea, which is downwind from the Grand Harbour, to better understand the situation.
2	James Gabaretta Nature Trust Malta  03/12/2019	<p>It is alarming that certain aspects (like cruise liners) are not being considered, since this is a national action plan, therefore national interests should be given priority over EU targets. I agree that international cruise liners need to be included.</p> <p>Most of the mentioned measures target transport. I fail to understand why ERA should be the competent authority on this and how ERA and Transport Malta will be working together to ensure that these measures are actually implemented.</p> <p>What is ERA doing to incentive its employees to use alternative modes of transport? ERA needs to set the right example. Most measures are focused on car use, but not everyone has a car</p>	<p>This plan is a deliverable for an EU Directive, which clearly stipulates what should be included in the plan. Therefore, international shipping cannot be included for the sake of comparability with other Member States. This does not mean that ERA is underestimating the impact of international shipping on air quality. ERA acknowledges that this is of national concern and therefore will be intensifying studies on the effect of international shipping on local air quality in the near future.</p> <p>This document has been drafted by ERA following extensive discussions with Transport Malta (TM) and other authorities and entities. Although ERA does not have a direct remit on traffic, it is ERA's environmental responsibility to spearhead this programme. ERA has always cooperated with TM, who will have to implement a number of the measures of this programme that have been streamlined from their National Transport Strategy.</p>

		e.g. I use a motorbike. Alternative means of transport exist, and we need to move away from the idea that everyone is a car driver.	ERA has a green travel plan. Incentives are offered to employees to use alternative modes of transport, including incentives to use public transport and to cycle to work by increasing cycling infrastructure (e.g. bicycle racks, showers). We try to lead by example, however it then depends on each individuals' decisions.
3	Stephen Camilleri Transport Malta  03/12/2019	<p>Cruise liners in a port does require significant power. These often run on diesel, therefore there are emissions happening at all times. TM did a study a few years ago on the possibility of plugging in cruise liners into the national electricity grid network, to take advantage of the cleaner energy. However, this study was inconclusive since there was no clear policy direction about whether ships need to be encouraged to be cleaner or not. There is a need to look at what incentives and disincentives can be offered to plug in ships to the national network. This includes national navigation such as the Gozo Channel, which plug into a generator at night, and could include tug boats and all other vessels which don't power off and could easily be plugged in. Cruise liners are probably the most difficult to plug in because of the power requirements.</p> <p>With reference to aviation, emissions from Landing and Take-off (LTO) cycles are set to increase. Since it is difficult to make actual changes to aircraft, there is a policy opportunity to make improvements on the ground operations in the airport, to make processes more efficient.</p> <p>In the studies carried out for the Transport Master Plan and the National Transport Strategy, one of the most effective, but also most difficult, policy measures was the implementation of quality public transport corridors. This was holistically looking at making the public transport experience better overall.</p>	<p>Incentives for shore power are an interesting proposal. ERA will be looking into this further in relation to future measures to be included in the upcoming air quality plan. Since it is internal travel, the Gozo Channel is covered by this plan and it is good to note that these ships are already using shore power in the Mgarr Harbour.</p> <p>Commenter was asked to submit a proposal in writing.</p>

		<p>One of the best ways to prevent pollution of any type is not to burn fuel, therefore we should be using active travel more (i.e. walking, cycling, etc.). Anything which does not need a battery is positive (electric cars will still need to use fuel at the power stations).</p>	
4	<p>Anonymous 03/12/2019</p>	<p>I come from the area of producing carbohydrates, which set free pure oxygen. The 114 sq km of plots, parcels and fields in Malta and Gozo are capable of producing more fresh air than they have been doing over the last few years, perhaps since accession to the EU. So my observation is that MEPs have been tardy in recognising what croplands are capable of producing.</p>	<p>Commenter was asked to submit a proposal in writing.</p>
5	<p>Nicoletta Moss Debono Group 03/12/2019</p>	<p>Most areas which are subsidised are where Malta Public Transport or Transport Malta are involved. There are several private companies that provide alternative modes of transport such as micromobility and carpooling. It would be beneficial if these are also included in the proposal.</p> <p>There is a lot of emphasis on electric vehicles, while hydrogen power is not being considered. There are several areas where hydrogen power can be implemented, such as hydrogen buses.</p> <p>Debono Group is also working on a green mobility plan. It would be beneficial to learn from other companies who have such plans in place (like ERA's). Incentives should be provided to encourage large corporations to adopt green mobility plans. It is a first step – if your neighbour does it, other people will follow.</p>	<p>With regards to micromobility, we can discuss your suggestion with the Ministry responsible for transport, to see whether we can develop any measures to include in the plan.</p> <p>ERA supports all alternative fuels. The Ministry responsible for transport is looking into a number of options for alternative fuels.</p> <p>Apart from having a Green Travel Plan, ERA also reviews development proposals. We always take the opportunity when reviewing major development applications to add requirements for the inclusion of green travel plans for employees.</p>

		<p>It would be beneficial to get rid of the two-tier taxation system in place, to encourage changing multiple family cars with alternative means of transport.</p>	
6	<p>Ruben Abela 03/12/2019</p>	<p>It appears that the largest contributor to pollution is road transport. The presentation showed data up to 2017 and states that the concentration of NO<sub>2</sub> will remain stable. It is not clear whether this took into consideration the number of vehicles being registered today, compared to 2017. As we have, there is a large tie between individuals and their cars, and it is not easy to make a cultural change.</p> <p>The government and policy makers are giving the direction to increase the use of electric vehicles. So far, a significant change has not been seen. First of all, planning policies give no consideration to electro-mobility. For example there are no obligations emerging from the DC15 for developers to include facilities such as charging stations for electric vehicles (including charging stations). From an infrastructure perspective, current road works are not giving consideration to infrastructure required for electrification. How are people who don't have garages going to charge their vehicles? The charging points currently available around the country are not economically viable, since a contract has to be signed with the provider to pay a monthly fee regardless of the amount of charging. Currently, there are only three free charging points in Marsa, Cirkewwa and Ta' Xbiex.</p> <p>In the 2017 electoral programme, one of the government policies is for public entities to have electric fleets of cars.</p>	<p>With reference to projections, these require a long reference time period. Reporting cycles for air quality data are retrospective, since the data processing takes time.</p> <p>With reference to planning tools, ERA will consider exploring this further with the Planning Authority. There is good scope for obligations to be imposed on large developments for electric charging points.</p>



		<p>However, the Ministry of Finance has a circular which caps the value of cars which can be bought, thus excluding electric cars from being able to be bought. This circular has to be removed or revised. The government is giving a direction that cars should be bought rather than leased. No department can publish tenders for electric cars, as these will not be accepted by the Ministry for Finance.</p> <p>It is true that grants for electric vehicles exist, however these grants have changed. Before it was feasible to get an almost new second hand car from the UK, since the grant was €5000. Now the grant was reduced to €3000, presumably to safeguard cars from local businesses. We have to see why these changes are happening, as these are not incentivising people to buy electric vehicles.</p> <p>We speak about grants, but are afraid to mention taxes, since government policy is not to introduce new taxes. A large volume of SUVs are being imported, which are more expensive than electric cars. These should be taxed since they have large engines. They already pay higher licenses, but these need to be increased, to reduce issues of parking spaces and pollution. The money from taxes can then be used to offer more grants.</p> <p>While it is conceded that this plan is being done as part of an EU obligation, the health of Maltese citizens should be given priority over EU obligations. Cruise liners do not affect most of Europe, bearing in mind several countries are mostly land-locked. I am not sure whether there is a directive on transboundary emissions. The volume of tankers passing around Malta is very large. These tankers use Heavy Fuel Oil (HFO) since it is cheaper and can use it outside territorial</p>	<p>MFIN has clarified that the circular's thresholds apply to ICE vehicles and the circular specifically states that environmental-friendly vehicles would be considered on their own merits. One of the measures included in the draft NAPCP, which has been endorsed by government, is that the government should lead by example and electrify its fleet. This measure will help to address any issues related to capping of costs.</p> <p>This policy and other government policies are clear that grants for electric vehicles will continue. One needs to look at individual grants in detail to see how they will be implemented.</p> <p>Discussions on registration taxes are ongoing.</p> <p>ERA is giving due attention to cruise liners, and will be carrying out intensive studies with our mobile monitoring station in the Senglea area, which are potentially affected by cruise liner emissions. With reference to international shipping, the Gharb monitoring station is intended to measure the background</p>
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		<p>waters. What effect are these emissions having on Malta? A black cloud can be seen over the horizon on calm days.</p> <p>Aviation traffic has increased drastically. Malta has benefitted economically from this as flights passing over Malta have to pay a tax. How is Malta being affected by emissions from such aircraft?</p>	<p>concentrations of air pollutants, as well as to gauge the levels of transboundary pollution (including from international shipping). So far, there is no significant evidence that Malta is significantly affected by emissions from shipping. We are affected by other transboundary pollutants such as ozone, which does not originate directly from shipping.</p>
7	<p>Christopher Cutajar Permanent Secretary Ministry for Transport, Infrastructure and Capital Projects</p> <p>03/12/2019</p>	<p>With reference to electromobility, we are currently in the process of transposing a directive related to making buildings more suitable to sustain electro-mobility. This aspect falls under building regulations, rather than planning applications. We are currently at an advanced stage of this transposition, and will be presenting to cabinet.</p> <p>With reference to the charges for users to charge electric cars. From January 2020, the system will be pay per use per unit of consumption, rather than monthly fees and requirements to register. This will act as a further incentive for local as well as foreign users to use electric vehicles.</p> <p>Furthermore, there are 90 charging points from the DEMO EV project, which served as a pilot project offering electrification infrastructure, and three solar charging stations from the PORT-PVEV project. These should be used at a charge also, as there were situations where users would take advantage of this free service.</p>	<p>Comments are noted with thanks. ERA looks forward for further collaboration with TM/MTIP.</p>

		<p>As part of the 2020 budget, Enemalta announced that it will be offering favourable rates for those who charge their electric vehicles overnight.</p> <p>It is beneficial that this policy is under the watch of the Ministry for the Environment, because ultimately all policies are implemented for the benefit of our environment. The e-cars committee is the ideal forum for holding discussions between representatives from the transport, energy and environmental sectors. The social and financial aspects also have to be taken into consideration.</p> <p>When focusing on financial considerations, it is important to recognise that current car registration is producing considerable revenue. Thus, a thorough exercise has to be carried out to assess the implications of implementing the polluter pays principle; such that when the fleet starts converting to alternative mobility, users of the road network are taxed for the maintenance of the road network as is the practice in other countries. This exercise, together with the carrying out of relevant consultations will also feed into improved knowledge on the cut-off date for the importation of ICE vehicles.</p> <p>A survey on the use of alternative use of transport was carried out within the Ministry for Transport, which resulted that 30% use alternative modes of transport. For Green Travel Plans, it is important to start by consolidating what we already have, by incentivising those who are already using green transport. Further efforts need to be made by Government entities to strongly invest in Green Travel Plans.</p>	
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8	<p>Nicholas Bellizzi  NBEEngineering Services  03/12/2019</p>	<p>I would like to know whether ERA puts pressure on the government to put common gas reserves in industrial estates, for companies who would like to shift to gas from HFO. The current problem is that the companies have no place where to put a gas tank, due to the parameters given by REWS and CPD. Several users of HFO, such as laundries, cannot shift to alternative fuels.</p> <p>Certain businesses require constant travelling. Is it possible for the government to give specific subsidies to such businesses, which pollute extensively due to the nature of the work involved? Currently it is too expensive to shift an entire fleet to electric vehicles.</p>	<p>ERA will be discussing this very positive suggestion further with other responsible entities.</p> <p>Subsidies are being proposed in the plan, although ERA has not gone into detail in the document since further discussions are required to set up these schemes. However, ERA will consider businesses that require frequent travelling in future discussions.</p>
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