



Post Consultation Brief on the Limitation of Emissions of Certain Atmospheric Pollutants (Amendment) Regulations

January 2021



EXECUTIVE SUMMARY / GENERAL COMMENTS

The draft Limitation of Emissions of Certain Atmospheric Pollutants (Amendment) Regulations, 2020, were issued for public consultation, beginning on the 26th November 2020 and ending on the 2nd January 2021. Members of the public were invited to make comments and suggestions as to how the proposed regulations could be improved to reach their ultimate aim. Only one comment was received via email during the said consultation period, as outlined below together with ERA’s reply on the said comment.

DETAILED CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder	Comments Received	Response / Remarks
1	Karl Farrugia Wismayer	<p>Schedule III: To clarify that in line with the Directive, the main methodology used to calculate and report emissions from road transport shall be based on fuel sold in Malta;</p> <p>I would comment by pointing out that vehicle emissions depend on various conditions of the Engine, Load, Wheels, After treatment technologies and most of all Real Drive condition; all affecting the emissions in the air. The amount of fuel sold in Malta may be used as an indication but should not be the only benchmark.</p> <p>By simply basing oneself on the measure of Volume, one needs to also measure Gasses out of that volume in order to measure correlations.</p> <p>Whilst appreciating that fuel sale is being used as a basis by other EU counties to report emissions, one needs to keep a focus on the emissions generated by road and non-road vehicles in order to also identify</p>	<p>Thank you for submitting your comments.</p> <p>Whilst the EU Directive refers to fuel sold as the general basis for Member States to calculate emissions from road transport, ERA confirms that fuel sold is one of a number of parameters that are used when calculating emissions from road transport in Malta. By way of background, the road transport sector is considered to be a “key category” and as per Part 1, indent 2 of the Third Schedule of the Limitation of Emissions of Certain Atmospheric Pollutants Regulations (S.L549.124), emissions from key categories shall be calculated in accordance with the methodologies defined in the EMEP/EEA Guidebook, using a Tier 2 or higher methodology.</p> <p>The Tier 2 method considers the fuel used by different vehicle categories and their emission standards. Malta, together with other Member</p>

		<p>which are emitting the most and seek remedial action. In this way the citizens will be reassured of the best attention being made in order to manage the quality of air in Malta.</p> <p>I am sure that ERA will want to see that monitoring of air quality is taken on and not limited to correlations from only the sale of fuel and welcome the clarification that ‘Malta shall indeed be designating monitoring sites and monitor the impacts of air pollution on ecosystems’.</p>	<p>States is encouraged to make use of the COPERT software, which is the EU standard emissions calculator, making use of the stock and mileage, as classified by vehicle category, speed, fuel sold, and other data such as ambient temperature. This helps ERA calculate emissions as well as energy consumption.</p> <p>For further information on the methodology applied, data sources used, and the trends analysed by Malta please refer to Malta’s Informative Inventory Report (IIR) [click here]. Moreover ambient air quality in Malta is also monitored as per the requirements arising from SL549.59, additional information is available here: https://era.org.mt/topic/real-time-air-quality-network/.</p>
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