

ERA's reply to the MECP/AIS consultants response in respect of ERA's comments on the SEA Environmental Report for Malta's long-term Waste Management Plan 2021-2030

ERA's original comments (provided 9 th June 2021)		MECP/AIS consultants reply on ERA's comments	ERA's follow-up reply
Section 1: Introduction		Noted.	Noted.
Section 2: Strategic Issues	Par 2.1 and 2.2 on Waste management facilities	Noted.	Noted.
	Par 2.3 on Waste management facilities	MECP: Does this feedback suggest that the WMP be edited to include site-specific details regarding the location of smaller-scale infrastructural facilities (which ERA would provide)? MECP would wish to highlight that the proposed measures regarding the smaller scale facilities, such as a centralised WEEE collection point or other infrastructure to address end of life tyres or end of life vehicles were measured proposed by ERA during the development of the WMP. Moreover, the strategic nature of the WMP does not necessarily call for site specific detail on the location of such infrastructure. Nevertheless, MECP would concur that any such infrastructure development would be subject to the applicable environment and planning/development procedures.	The environmental parameters and safeguards highlighted in ERA's comment are to be included as recommendations in the SEA ER, to be taken into consideration at project stage as part of the design of the development and in the selection of suitable locations, so as to avoid major environmental impacts.
	Par 2.4 on C&D waste	MECP: The WMP offers relatively limited input regarding C&D waste because a separate strategy dealing specifically with C&D waste is being formulated and has already been issued for public consultation. To avoid overlap or duplication it was agreed that the specific measures for C&D waste would be addressed by this dedicated strategy and not in the WMP.	Noted.
	Par 2.5 on Appropriate Assessment	MECP: Noted and see 2.3.	Noted. This relates to ERA's screening under the Habitats Directive to determine whether the draft plan needs

			to be subjected to an Appropriate Assessment.
	Par 2.6 on Appropriate Assessment	MECP: Noted.	Noted. As above.
Section 3: Detailed Comments	Section 7.1.1 Air Quality	MECP: Points will be passed on to consultants for consideration	Noted.
	Section 7.1.1 WE_EL1 and MC_EPR1	AIS: Repair and reuse centres as proposed in WP_EL1 are currently absent in the local scenario. Transportation effects caused by WP_EL1 are cancelled out by the carbon footprint when importing new/replacement products. The development of such centres will have a beneficial impact on air quality since they will reduce the disposal of the waste types targeted by these centres. As a result, there will be less landfilling of waste and less atmospheric emissions from the landfill. WEEE is already being collected via private operators and by public disposal at CA sites. The establishment of a centralised WEEE collection point will divert traffic to a centralised location thus increasing emissions locally but rendering waste transportation trips more efficient on a national level. Therefore the overall impact of MC_EPR1 on the national air quality is considered to be negligible.	
	Section 7.1.2 Biodiversity	MECP: Points will be passed on to consultants for consideration AIS: Noted and amended.	Noted.
	Section 7.1.2 Biodiversity (WMRO_I4)	AIS: WMRO_I4 seeks to prevent further land uptake for landfilling purposes. It must also be acknowledged that landfilling will need to remain as a necessary part of our waste management infrastructure and that impacts from landfilling have been ongoing in the Maltese islands for many decades. Therefore this measure seeks to make use of the existing waste management infrastructure without causing further uptake of land. Consequently, no additional environmental impacts are being introduced with this measure when compared to the existing scenario. Furthermore, it is important to note that the existing landfill	Noted as long as suitable mitigation measures are put in place at project-stage. It is also important to ensure that the increase in landfill void space does not result in the encroachment of landfilling activities and other ancillary

		is already engineered to contain any leachates and to minimise the release of atmospheric pollutants.	interventions onto adjacent undeveloped land.
	Section 7.1.3 Soil	MECP: Points will be passed on to consultants for consideration.	Noted.
	Section 7.1.3 Soil (WMRO_EPR17, WMRO_EPR25)	AIS: Impacts on the quality of primary water, ground water and surface water were considered in the water chapter 7.1.7	
	Section 7.1.3 WP_EI1 and WMRO_EPR10	AIS: Various project-level mechanisms are in place to protect the environment, such as environmental permitting and detailed EIAs in line with the EIA REGULATIONS. Such devices should also be considered so as to ensure that these WMP measures are implemented without having, individually or cumulatively, significant adverse environmental impacts.	The environmental parameters and safeguards highlighted in ERA's comment are to be included as recommendations in the SEA ER, to be taken into consideration at project stage as part of the design of the development and in the selection of suitable locations, so as to avoid major environmental impacts, including those on soil, land, landscape and biodiversity.
	Section 7.1.4 Climate Change	MECP: Points will be passed on to consultants for consideration.	
	Section 7.1.4 Climate change	AIS: The WMP states that landfilling will need to remain as a necessary part of Malta's waste management infrastructure and that impacts from landfilling have been ongoing in the Maltese islands for many decades. Therefore WMRO_I4 seeks to make use of the existing waste management infrastructure without causing further uptake of land. Consequently, no additional climate change impacts are being introduced with this measure when compared to the existing scenario. The effects on climate change have been assessed in terms of GHG emissions. According to literature, WtE projects are likely to reduce GHG emissions when compared to landfilling practices. Consequently,	Noted as long as suitable mitigation measures are put in place at project-stage.

		<p>the impact of WMRO_I6 has been determined as beneficial to climate change.</p> <p>The centralised collection of WEEE will not be increasing GHG emissions because such waste is already being collected/transported locally in decentralised facilities. Therefore the overall effect in terms of climate change is expected to be neutral.</p> <p>WMRO_CW2 the impact is unknown as any additional emissions from the extra weekend collection rounds may potentially be offset by reduced landfilling emissions resulting from the mixing of organic waste from commercial entities with other waste types.</p> <p>Noted and amended impact of WP_L10 on climate change to adverse.</p>	
	Section 7.1.7 Water – Point 1	<p>MECP: Noted. Does ERA suggest any changes to the WMP in this regard?</p> <p>AIS: Noted and amended.</p>	Noted.
	Section 7.1.7 Water – Point 2	<p>AIS: Refer to previous response to WMRO_I4.</p>	Noted (see above).
	Section 7.1.8 Human health	<p>MECP: Points will be passed on to consultants for consideration.</p> <p>AIS: Refer to previous response to WMRO_I4.</p>	Noted (see above).
	Section 7.1.9 Landscape	<p>MECP: Points will be passed on to consultants for consideration.</p> <p>AIS: The location of facilities created through WP_E1 and WMRO_EPR10 are unknown at this stage. Various project-level mechanisms are in place to protect the environment, such as environmental permitting and detailed EIAs in line with the EIA REGULATIONS. Such devices should also be considered so as to ensure that these WMP measures are implemented without having, individually or cumulatively, significant adverse environmental impacts.</p>	Refer to ERA comments in para 2.3. and Section 7.1.3 in relation to both large-scale and small-scale waste management facilities and installations. The environmental parameters and safeguards highlighted in ERA's comments are to be included as recommendations

			in the SEA ER, to be taken into consideration at project stage as part of the design of the development and in the selection of suitable locations, so as to avoid major environmental impacts.
Section 7.1.9 Landscape	AIS: WMRO_I4 is expected to have a neutral impact on landscape since the positive impacts of making efficient use of the landfill footprint cancel out any adverse impacts arising from the potential increased height and/or steeper sloping.		Noted.
Section 7.1.10 Transport and Infrastructure	MECP: Points will be passed on to consultants for consideration.		Noted.
7.1.10 Transport and Infrastructure – Point 1	AIS: Any potential increases in traffic/transport is not covered in this environmental theme (Transport and Infrastructure) but is covered in the Air Quality Environmental theme.		
7.1.10 Transport and Infrastructure – Point 2	AIS: One of the assumptions made throughout the impact assessment was that all legislation and permit requirements are followed during the implementation of such measures. This assumption implies that all RCVs made redundant via the decommissioning of sub- standard vehicles will automatically be directed towards Authorised Treatment Facilities		
7.1.11 Waste and Resource Management – Point 1	MECP: Point will be passed on to consultants for consideration. AIS: The impact of WC_4 reflected in table needs to be adjusted from beneficial (2) to adverse (-1) The separate collection of batteries and accumulators will not result in the additional disposal of bags since these are collected in specific reusable bins.		Noted.
Section 7.1.11 Waste and resources management – Point 2	MECP: Noted. Does ERA suggest any changes to the WMP in this regard?		Noted as long as suitable mitigation measures are put in place at project-stage.

		AIS: Refer to previous response to WMRO_I4.	
	7.1.11 Waste and Resource Management – Point 3	MECP: Noted. Does ERA suggest any changes to the WMP in this regard? AIS: Noted	No revisions are required.
Section 4: Mitigation Measures and Recommendations	Par 4.1	Noted.	Noted.
	Par 4.2	MECP: Noted. Does ERA suggest any changes to the WMP in this regard? Re Hal Far Industrial Area (editorial change) point will be passed on to consultants for consideration. AIS: Reference to Hal Far has been updated accordingly.	Noted.
	Par 4.3 Comment on bring in sites	MECP: Noted. Points will be passed on to consultants for consideration. MECP would however note that the development of bring in sites would be subject to planning/development procedures where such environmental considerations as highlighted would need to be taken on board. MECP suggests that a discussion is held with ERA regarding whether development consent would be required, and on whether ERA has taken this into account vis-à-vis the recent Waste Regulations projecting an increase in bring-in sites based on population density. AIS: Noted and amended	Noted.
Section 5: Alternatives	Par 5.1 and 5.2	MECP: The three alternatives provided (full implementation, full implementation without voluntary measures, and zero option) are the standard alternatives and were selected as per established practice. With regards to point 5.2, MECP would again note that site specific details of smaller scale infrastructure were not included in the WMP given its strategic vision.	Noted.
Section 6: Monitoring Requirements	Par 6.1	MECP: Noted. Points will be passed on to consultants for consideration.	Noted.
	Monitoring requirements - BAT	Noted and amended.	
	Monitoring requirements - MSFD	Noted and amended.	Does not seem to be addressed in the ER.

	Monitoring requirements - infrastructure	Noted and amended.	Noted.
Appendix 1		<p>MECP: Request for specified editorial changes will be passed on to consultants</p> <p>AIS: Noted and amended.</p>	Noted.