

Public Consultation Submissions & Responses

Long-Term Waste Management Plan

2021-2030

Public consultation: 14th December 2020 – 31st January 2021

CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Anthony Curmi - 23/12/2020	<p>Strict regulation needed to improve ways in which commercial establishments place their waste outside for collection:</p> <ul style="list-style-type: none"> The methods used by commercial outlets to place their waste outside for collection should be regulated, so as to ensure that such waste isn't simply dumped outside their premises haphazardly but is folded-down and banded together with tape, hence reducing its volume and keeping it tidy until it is collected. 	<p>The WMP will be significantly upping the game when it comes to the management of waste generated by the commercial sector, including by introducing the mandatory separation of organic and recyclable waste, while training commercial establishments on how to prevent waste and correctly separate the waste they generate. Commercial establishments will be required to exclusively use waste bags compliant with national standards, which will also aid in improving street cleanliness.</p> <p>Moreover, the WMP envisages the setting up of smart waste depots for residual and organic waste, which depots can be accessed 'on demand' by commercial establishments through the integration of Artificial Intelligence. This will help make the process for commercial establishments to deposit their waste more hassle-free and will serve to promote street cleanliness.</p>
2	Mary Castagna - 22/12/2020	Sant' Antnin MBT plant in Marsascala causing inconvenience to neighbouring area:	

		<ul style="list-style-type: none"> • The Sant' Antnin plant which treats organic waste is creating toxic smells which are negatively impacting the neighbouring Inspire Foundation premises, the Sant' Antnin Family Park, Dar Frate Jacoba and other nearby facilities which are attended by hundreds of people. The area should offer a healthy environment not toxic smells. 	<p>The WMP envisages the building of new Organic Processing Plant, which, once commissioned, will replace the Sant' Antnin anaerobic digester. This is planned to take place during the WMP's second phase, from 2024 to 2027. The new plant will be built because projections show that organic waste will increase, hence the new infrastructure will be important in helping Malta reach its organic waste targets. The new plant will also see the introduction of technologies to compost waste, enabling it to be used in agriculture.</p>
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3.	Margaret Camilleri – Institute for Climate Change and Sustainable Development, University of Malta – 27/01/2021	<ol style="list-style-type: none"> 1. The respondent highlighted that waste generation in Malta is the second highest in Europe and has been steadily increasing, whilst the European average has stabilised; signifying a rise in wastefulness. It has been suggested that this increase may be due to a rise in the purchasing of pre-packaged items, higher consumption of items with a short life like fads and fast fashion. 2. In terms of food waste prevention, respondent has suggested a focus on hotels and outlets which offer buffet service as research has proved that post-consumer food waste generated from buffets is three times that of an a-la-carte service. It has been suggested that hotels be encouraged to adopt a percentage discount to people who pre-book their dinner. In the case of a-la-carte restaurants, emphasis should be placed on the correct portion sizes since this is directly correlated to food waste. Suggestion for further studies into food portions in Malta compared to the European counterparts. Information about food portions should also be extended to households. 3. While eliminating waste is impossible, it is important that the institutions training chefs and other hotel staff, are trained about food waste during the preparation stage. 4. Initiatives with regards to single use plastics are lauded. However, more effort is required to eliminate the ubiquitous small plastic bag. Effort should also be extended to reduce the consumption of plastic film (which presently represents the second largest rejects stream from mechanical sorting pg. 215). Alternatives for this material exist both for catering establishments and households. 5. In the case of textile waste, educational activities on waste prevention should take account of fast fashion and the manner this is influencing 	<ol style="list-style-type: none"> 1. These topics will feature in upcoming outreach communications. 2. All catering establishments will be targeted through an upcoming campaign and training on food waste prevention and separation ahead of the mandatory separation and collection. The suggestion for studies into portion sizes in Malta relative to European counterparts will be explored. 3. Agreed, please see above feedback. 4. This suggestion has been noted and will be considered as a key part of the next phase of the Saving Our Blue Campaign. 5. It is intended that communication and outreach through the repair and reuse centres and swap shops will encourage these conversations. These issues will also feature in educational initiatives.
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		<p>consumption trends in clothes and other fashion apparel, particularly since these have shifted from durable to (quasi) disposable items. In this case education is key, particularly in children. However, adult-focused programmes are also important if a change in consumption trends is to be established.</p> <p>6. Industries must also be assisted to review their packaging methods and their operational processes to reduce waste generation. Authorities should also incentivise a shift from the use of disposal items towards more durable items. Common practices like the use of disposable plastic containers used for deserts during buffets and the extensive distribution of toiletries need to be reviewed since alternatives are already available.</p> <p>7. Initiatives to target supermarkets are welcome since these make it possible to reach a large amount of people with extensive and factual initiatives. It is important that the proposed ecolabel is sufficiently ambitious as this would influence its impact. It is also important to create measurable indicators that motivate applicants to set targets for the reduction of waste.</p> <p>8. The construction industry continues to have a prominent role within the Maltese economy contributing to circa 4% of GDP. However, the statistic should be taken in relation to other industries. Furthermore, for a holistic picture to be obtained, externalities generated by the industry need to be acknowledged in the national accounts. In this manner, a complete picture of the benefits and the costs the industry is responsible for is obtained. This point is applicable to every industry, since account is taken of their economic contribution but then hardly held accountable for the waste externalities they generate. Therefore, it is crucial that the true cost of the management and treatment of different waste streams is</p>	<p>6. In the case of disposable plastic food containers, these will be subject to action under the Single Use Plastics Directive. Regarding toiletries in hotels etc., your feedback is noted and will be considered.</p> <p>7. Indicators will be discussed together with stakeholders.</p> <p>8. The C&D Waste Strategy published for public consultation includes a measure which will explore ways to implement the polluter-pays principle for construction and demolition waste, whereby developers, as the waste producers, would bear the costs of waste management, including for the necessary infrastructure and its operation.</p> <p>9. This measure is already included in the Construction and Demolition Waste Strategy published for public consultation.</p> <p>10. Refer to response for point 8 above.</p>
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		<p>established as this would be one of the means to provide a true picture of the benefits and costs various industries are responsible for.</p> <p>9. While the initiative to mandate a minimum of 15% recycled materials in buildings is positive, it is also important to promote and implement deconstruction. The government can commence by utilising deconstructed material in its own projects thus create a market and encouraging contractors to introduce this practice. The importance of Resource and Recovery Storage depots is underlined. The prices of these facilities need to be contained since deconstruction of a building is likely to increase the costs of dismantling the dwelling and therefore owners are likely to be discouraged.</p> <p>10. As noted in other strategy consultations, a direct connection between C&D waste generation and approved building permits is present. The present disposal options (quarries and dumping at sea) present considerable limitations particularly since the latter must undergo extensive studies. Measures to curb C&D waste must include the curbing of permits and limitations with regards to the depth of the excavation are established until viable solutions for C&D waste are established.</p> <p>11. A waste prevention index (page 67) should be set through the imposition of policy target in terms of waste generation per capita. This means that after the waste generation per capita for different waste streams is established, targets are set to reduce this waste. This would provide a measurable waste prevention indicator for different waste streams.</p> <p>12. The need for regionalisation in the waste collection system has been felt for a very long time. Efforts in this area are therefore positive. An important point is to review the collection routes since presently they are left to the truck drivers. Using more advanced technology would</p>	<p>11. Details on how the waste prevention index will be calculated are currently being seen to.</p> <p>12. This is already contemplated for in the Waste Collection section in the Plan.</p> <p>13. The WMP aims at introducing the concept of the polluter pays to disincentivise the generation of mixed waste.</p> <p>14. While WtE is intended to reduce reliance on Malta's limited landfill capacity for non-recyclable materials, it is in no way a substitute for comprehensive waste prevention (and recycling) initiatives. Waste prevention remains a key priority under this Plan.</p>
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		<p>assist them to have a more effective collection system, reduce complaints and reduce transport related emissions.</p> <p>13. If the country wants to achieve a cleaner economy, one that is not riddled with waste externalities, economic policies need to start accounting for waste generation at their inception. Determining how much waste is generated by different industries and the respective costs to manage their waste fractions is a first step towards establishing the true costs and benefits accumulated to the country by different industries.</p> <p>14. The proposed strategy emphasises the introduction of a Waste to Energy (WtE) plant as a recovery method. While this is a move away from landfilling, it will not free the country from the need to have a landfill. Additionally, it is important to account for the rebound effect. An example can be drawn from Denmark – the country makes widespread use of WtE facilities and boasts of an extensive recycling rate but is then burdened with the highest waste generation per capita of municipal waste in the EU. Authorities must take note that incineration does not encourage waste prevention and build measures to counteract this.</p>	
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4.	St Paul's Bay Local Council – 27/01/2021	<p>San Pawl il-Baħar Local Council raised the point that a one size fits all approach for waste management is not an ideal scenario. The boundaries of the Local Council Authority are considerably larger than other regions. Additionally the prevalence of large apartment blocks within the area make it difficult for a one size fits all approach to waste management to be implemented effectively noting the lack of available space either within condominia or on the street for collective waste management options such as communal skips for each building.</p> <p>The Local Council made reference to the need to ensure enforcement of waste management rules and legislation if the WMP is to be successfully implemented.</p> <p>The Council indicated that the WMP utilized in accurate figures with respect to number of residents and number of local council employees and number of businesses in the Locality.</p> <p>The Council in their feedback made reference to the WMP indicating that Malta could follow the waste management approaches adopted in Milan but that this comparison is flawed given the differences between Malta and Milan and in the case of San Pawl Il-Bahar the lack of available space within apartment blocks for implementing measures such as waste chutes.</p> <p>The Council highlighted that the use of split back waste collection vehicles is not suitable for their locality. The Council also made references to the proposed amendments to the collection schedules and raised question with regards to the proposed time it takes to collect waste within their locality and therefore questioning whether the proposed amendments to collection times were feasible. Likewise the Council raised concerns with regards to the switch to regionalisation for waste collection and the fact that if collection of black bags within their locality is limited to twice a day that this will result in undesirable consequences of having rubbish left on the road especially in light of minimal enforcement to prevent the disposal of waste in the street.</p> <p>To this the end the Council proposed the following amendments to the WMP:</p>	<p>One size fits all approach</p> <p>The WMP seeks to propose holistic reforms that are to the benefit of the entire country. However, it has to be recognised that currently waste management in Malta is not meeting its desired outcomes and we are not reaching our obligations in this regard. Throughout the development of the WMP the specificities of each region have been taken into account as far as possible within the context of needing to provide a holistic approach to waste management for the country. To this end whilst we take on board the valid concerns of the Local Council in this regard this must also be balance against the difficulty in adopting a plan that would be piecemeal or wholly catered for one particular region, sector or interest group. Hence, in line with the Local Government Act which stipulates that Regions are to issue waste collection tenders on behalf of Local Councils, it will be up to the discretion of the Regions to allow for (i) additional collection of organic waste [only] on Sundays and (ii) the introduction of smart waste collection solutions for residents, as long as these are equipped with restricted access control. No compromise is expected for the collection of mixed waste (black bag).</p>
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		<ol style="list-style-type: none"> 1. that the figures in the WMP with respect to resident numbers and numbers of business are accurate; 2. that a one size fits all approach will not work especially for a locality such as San Pawl Il Bahar; 3. That the Government should introduce a system of mandatory recycling through the adoption of legislation in this regard. 4. That enforcement of laws related to waste are stepped up immediately and that stricter measures and fines are introduced to penalize those breaking the law. This could include the power to issue on the spot fines. 5. that a system of property registration with the Local Council is introduced for owners of apartment that are either lived in or rented out. This would be extended to plots or unbuilt land. This register would allow the Council to know which properties are rented and by whom and thus allow them to take action against tenants whilst being fair to the landlords/owners of property. The San Pawl il-Baħar Local Council is totally against the owner of a long rented property being in any way brought in or held liable for any default that occurs by the tenant when he has registered with the Council. 6. That, the proposed reform to waste collection should be such that it helps to reduce number of trips by waste operators. The Council believe that this is best done by not replacing smaller collection vehicles with larger ones but instead by obliging residents to dispose of their household waste in a central location near the property. By reducing number of trips by waste collection vehicles the Council believe that this will improve the quality of the local environment with less traffic and less emissions. The Council suggests that the use of a barcode system to dispose of waste as well as the use of underground waste bins should be studied. 7. That the WMP should not use flawed comparisons with other European cities as best practice case studies as the applicability of such to Malta is limited in their view and therefore impacts on the validity of the overall WMP and its measures. 8. That waste collection vehicles are fitted with CCTV cameras to record waste collection operations. 	<p>Accuracy of data We thank the Local Council for highlighting the discrepancies in some of the figures with respect to number of residents and business within the San Pawl Il-Bahar local authority area. The WMP and the proposals within it are based upon the latest available data.</p> <p>Improving enforcement We recognise that enforcement of waste legislation is an important factor and a very visible and tangible element of waste management overall.</p> <p>The role of Local Council in engaging with enforcing authorities to patrol hot spots within their boundaries is one which should not be overlooked. Nonetheless, Government is committed to ensure further robustness of the enforcement system to strengthen compliance with the rules. The WMP already proposes such measures.</p> <p>Mandatory Recycling Government is committed to ensuring that we improve the recycling rate in Malta. The WMP envisages the introduction of regulations mandating that all households and commercial waste owners and operators segregate their waste at source, and failure to do</p>
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			<p>governed by different timeframes. A system of reverse vending machines are due to be in place by end of year.</p> <p>With regards to utilising a similar system for E waste at this stage such plans are not envisaged.</p> <p>Suggestion related to industrial parks There is already a system of bring in sites for the deposit of recyclables and waste metals and oils.</p> <p>On property registration The concept of introducing a local register of landlord/property owners is already being implemented at the national level by the relevant competent authority. As such this is out with the remit of the WMP. Whilst we take note of valid concerns in this regard with respect to ensuring tenants abide by waste regulations it would not be advisable to include such measures within the WMP as such but would be best addressed through other mechanisms. Nonetheless, the validity of the proposal is recognised and it will be passed on to the relevant authorities.</p> <p>Underground waste collection Underground waste collection systems are not being disregarded. Local Councils</p>
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			are at liberty to identify sites and build central points of collection as additional infrastructure as long as these have restricted access control.
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5.	Regjun Tramuntana (George Abdilla) / 28/01/2021	<p>Scenarios presented in WMP</p> <p>The Regjun Tramuntana provided considered and detailed feedback on the scenarios presented in the Data Flow Modelling chapter of the WMP. Significant concerns with regards to the validity of the scenarios presented was provided. In summary the Regjun questioned the validity of the providing a do nothing sceanrio (referred to as S1 in the WMP) due to the inherent unacceptability of this outcome.</p> <p>With regards to the S2 scenario the feedback indicates that the Regjun believes that this outcome will not meet the requirements of EU Directive 2018/851 on waste, planning for 45% landfilling by 2030 (EU target is 10% by 2035) and only 12.4% recycling of municipal waste by 2030 (EU target is 60%). The Regjun opined that aiming at low targets for 2030 will result in a continuation of Malta’s landfill burden and the exposure of Malta to EU fines for non-achievement of the targets. Additionally, the Regjun highlighted that the forecasted 52,800 tons (12.5%) municipal waste going to Energy-from-Waste (waste incinerator) or 53,869 tons of total waste, in 2030 do not seem to justify the 192,000 ton capacity of the planned incinerator. Continuing the Regjun outlined that given the pressures on landfill space, the WMP should not include the continuation of landfilling in such quantities (236,110+ tons) as a valid waste disposal option. They concluded that this quantity needs to be dramatically reduced through prevention, separate collection, reuse and recycling to solve Malta’s waste problems. The sophisticated separate collection system described in the plan and including the separate collection of organic waste from large producers also seems not to fit the plan of investment in waste treatment facilities.</p> <p>To address the above issue the Regjun suggests a revision to the WMP to include the immediate planning and investment in an anaerobic digestion plant of capacity no less than 100,000 tones per year including food waste collected from households and large producers. This ‘new’ plant should be complimented by in-vessel composting facility for the co-composting of digestate and shredded garden waste to all for the generation of composted waste within a 3-4 week period.</p>	<p>Scenarios and waste flow modelling</p> <p>The Waste Flow Model chapter in the WMP makes use of detailed scenario building as a means to forecast where waste generation will be over the lifespan of the WMP (2021 to 2030). The outcomes of the model, undertaken by independent consultants with expertise in this field, are a useful instrument for the development of waste policies. It is standard practice to model a do-nothing scenario as well as a do-something scenario. This of course does not mean that in reality the do-nothing scenario will come to fruition or the do-something scenario is the only option available to Government in terms of planning for the future. Rather they provide a valuable snapshot and forecast of where we could be in terms of waste management in 5 and 10 years’ time. The do-nothing constitutes the baseline and worst case scenario, if no action is taken. But this is far from being the Government’s vision, which has been translated into measures within the Plan. The do-something scenario is a scenario showing minimal intervention. Again, as with the case of the do-nothing scenario, the do-something scenario is not Government’s preferred option. Both scenarios were put forward as part of the waste flow modelling process required for the</p>
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		<p>any investments for Prevention, Preparation for Reuse, Reuse, Recycling (including separate collection, sorting facilities and Anaerobic Digestion/Composting) are prioritised and encouraged. Any investments in non-prioritised facilities will revert to funding from their own national budget.</p> <p>Given the above, the Municipalities of the Regjun Tramuntana where these facilities will be located, do not accept the continued emissions to air of methane and particulates which exceed both legislative and health limits from the landfill. In their opinion this can be avoided with the implementation of the correctly quantified organic waste treatment, concentrating all volumes of organic waste in the same combined installation with anaerobic followed by aerobic digestion. For the same reasons the Regjun is unable to accept a recycling target for 2030 of only 12.4% of municipal waste and 10.4% of total waste including the added burden of fines for nonachievement of EU targets.</p> <p>In the case that the national level is not willing or able to invest in an anaerobic digestion plant with larger capacity, the Regjun Tramuntana is ready and willing to plan and execute this investment itself. This offer can also be extended to include the treatment of separately collected biowaste from both small and large producers from the other regions of Malta and Gozo under an interregional arrangement as exists in other EU Member States.</p>	<p>per year are appropriate. In 2018 alone, the segment of waste that could have been diverted to this new facility stood at 234kt, higher than the chosen capacity as WasteServ is seeing this plant as an important link in a chain of other facilities intended to holistically reach EU targets. For the purpose of WtE analysis, predictions of future population growth were based on population data established on a set of forecasts used in the context of the Energy and Climate package. It should also be noted that a waste characterisation exercise was carried out over a period of 12 months in order to determine accurate waste arisings. Furthermore, the way the plant is designed we are given the flexibility to either use only one line or both – to cater for the influx of population during summer period. Therefore, the chosen capacity gives us full potential in terms of diverting waste from landfilling but at this time does not in any way limit the Islands’ recycling capabilities.</p> <p>Comments regarding additional AD and composting capacity</p> <p>The WMP includes the direction to build and commission an Organic Processing Plant using anaerobic digestion which further conditions the by-product to produce fertilisers for agricultural use.</p>
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6.	Frederick Cutajar – 28/01/2021	<p>Consider underground waste collection systems as part of the future waste management plan for Malta:</p> <ul style="list-style-type: none"> • Underground waste collections systems are the way forward given Malta's limited space, very high summer temperatures, and tourism-sensitive economy • They can be used in areas where aesthetics and hygiene are a priority • Advantages: <ul style="list-style-type: none"> ○ waste is stored underground, so smells will not be an issue; ○ above-ground chutes can be adapted according to the area (there are economical and luxury ones, depending on the environment they are being installed); ○ smart system can be installed; ○ use of disposal access chutes can be managed (accessible to all, restricted access and manageable access); ○ space-saving; ○ it blends with the aesthetics of the area; ○ depending on the system, the capacity of the underground can be up to 6.5m³ per container, which drastically reduces the collection trips to site 	<p>Kerbside waste collection is currently the method through which the majority of waste is collected. Having said so, a significant use of bring-in sites has been registered recently.</p> <p>Local Councils are at liberty to identify sites and build central points of collection as additional infrastructure as long as these have restricted access control.</p> <p>The Plan considers smart waste depots for commercial waste, and nothing precludes regional authorities from opting to have them underground, if the areas allow for that.</p>
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7.	Maria Gatt (family waste sector contractors) – 29/01/2021	<ul style="list-style-type: none"> • Fleet modernisation should allow LPG: LPG waste carriers should be an option for waste contractor which are unable to purchase an electric waste carrier. The conversion of an existing vehicle to LPG will only cost €6,000, while electric vehicle are still very expensive • Waste collection tenders could lead to small operators going out of work: we were informed 5 tenders will be issued for 10 year or more. This means only a maximum of 5 companies will be working in this sector, choosing to either use their own fleet or include some other waste contractors to help out. Small companies or contractors which used to work by getting a tender for a small locality will be out of work as soon as this WMP measure is implemented. We therefore suggest that, in keeping with the regional approach, tenders of all localities within a region should be issued and closed on the same day, with the same specifications, and allowing different contractors to bid in localities of the region, so that all contractors will have the chance to bid for work. When awarded these contractors will work according to the schedule and plan of the region the locality is part of. It will be the responsibility of the regional manager/s to check that all the contractors are working according to the plan and that targets are met. • Enforcement needed to ensure commercial outlets use waste contractors not get their rubbish collected for free through the local council collections. Some establishments mix their waste with household waste to take advantage fo the free service. Commercial premises should have to present their contracts with waste collectors. • Food waste (such as vegetables and raw ingredients) left over from farmers' markets can be used in animal feed, hence reducing importation costs. 	<p>Fleet modernisation: It is acknowledged that the electric and Euro 6 trucks will lead to higher costs. However, Malta has an EU obligation (Clean Vehicles Directive) for 10% of its waste carrying fleet to consist of electric vehicles.. Further details pertaining to fleet composition and typology of RCVs will be defined in the preparation of the terms of reference of the regional tenders.</p> <p>Waste collection tenders: The benefits of regionalisation are explained in detail in the WMP. The aim of this approach is to consolidate and modernise, hence nothing precludes smaller operators who might not have the necessary resources to bid for larger contracts on their own to join forces with others and see this as an opportunity for growth.</p> <p>Enforcement vis-à-vis commercial outlets using waste contractors not LCs' service: The role of Local Council in engaging with enforcing authorities to patrol hot spots within their boundaries is one which should not be overlooked. Nonetheless, Government is committed to ensure that the Waste Management Plan is supported by a robust enforcement system which ensures compliance with the rules. The WMP envisages the</p>
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			<p>introduction of regulations mandating that all households and commercial waste owners and operators segregate their waste at source, and failure to do so will be considered an offence. Hand in hand with this, enforcement capacity will be reinforced to strengthen the measure. Commercial outlets will have their waste collected by either of two optional systems, namely by the collector of the region using pre-paid bags (so they would not be using the collection service for free) or through the engagement of waste collectors.</p> <p>Food waste for animal feed: If this is acceptable from a legal and animal welfare perspective this could be a beneficial way forward.</p>
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8.	RRRA (Elizabeth Musu) – 29/01/2021	<p>The Resource, Recovery and Recycling Agency (RRRA) agrees that the Extended Producer Responsibility (EPR) principle should be expanded to other areas, including textiles as EPR gives producers a significant responsibility for the treatment or disposal of products that would have otherwise been landfilled. RRRA notes that unless the EPR is properly monitored and enforced, its effectiveness would be less desired, with the consequences of the recycling targets not being met. RRRA proposed to support measures on EPR in the following ways:</p> <ul style="list-style-type: none"> ▪ Together with ERA, play an active role in reviewing the current legislative framework for EPR, through the management of full impact assessment on the potential socio-economic and environmental impact of the proposed amendments to the current EPR framework. ▪ Provide support in the re-designing of current EPRs, as well as carrying out further studies on other potential EPRs, targeting different waste streams. ▪ Be a catalyst in bridging the gap between the Government and the private sector. ▪ Manage the reporting and data collection through a common IT platform. ▪ Create awareness, improve public relations among the public and private stakeholders to further promote the concept of circular economy. <p>RRRA also acknowledges that preventing food waste is one of priority areas in the Circular Economy, and is able to offer its assistance in the following actions: ‘Support the utilisation of digital channels and applications for food redistribution initiatives and food sharing initiatives within communities (WP_D5)’ and ‘Limit retail and distribution outlets from discarding unsold food (WP_L3)’. RRRA proposed collaboration in facilitating the development and management of a digital application to bring forward implementation to the short term.</p> <p>RRRA reiterates that it has been developing concepts and principles vis-à-vis the different waste streams (textiles, end-of-life tyres, construction and demolition waste) which evidently fall within the scope of the Waste Management Strategy.</p>	<p>Feedback has been noted with thanks and suggestions for collaboration will be taken onboard for the development of implementation action plans.</p> <p>Collaboration between entities is key for the successful implementation of the EPR principle.</p>
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9.	Wilson Mifsud (WM Environmental)	<p>The use of split-back vehicles cannot be applied throughout the Maltese islands mainly due to accessibility issues in village cores and other narrow roads. Moreover, the capacity of the two compartments may lead to one filling up before the other and this would result in having to cut the round short to empty the vehicle.</p> <p>From our experience, volumes of recyclables are on the increase and hence it would make sense to use larger single compartment vehicles not a split-back for such collections.</p> <p>Double shifts are difficult to operate as vehicles need to be cleaned and maintained properly. With double shifts, we are risking having vehicles not properly cleaned and with irregular maintenance.</p> <p>Ideally new regional contracts cover a 10-year period, but for the first few years (at least 4 years), Euro 5 RCVs are allowed to operate, noting that many contractors invested in these vehicles in 2020.</p> <p>Suggestions to improve the waste collection schedules include collecting organic waste using smaller RCVs, and collecting recyclables twice a week.</p>	<p>Use of split-back trucks: Accessibility issues for split-back trucks in some localities/areas are acknowledged. In light of this, the move towards split-back trucks will not be applicable throughout but consideration will be taken of areas which cannot be accessed by such vehicles. In such areas, on days when two waste fractions are collection (plastic/metal or paper/cardboard), a single compartment vehicle will pass by twice, making two collections.</p> <p>Twice-daily collections: The aim of twice-daily (day and night) collections is to maximise the utilisation of waste collection vehicles and to require for contractors a higher level of logistical ability that when necessary a different crew operates the vehicle for different rounds. This is similar to the public transport model where vehicles operate for long periods of time. The WMP does not mention specific collection times, except that there should be two shifts. This matter will be further clarified in the terms of reference of the regional tenders.</p> <p>Increased volumes of recyclables:</p>
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			<p>The volume of the grey/green bag will decrease due to a shift of a number of items to the beverage container refund scheme.</p> <p>Vehicle typology in new contracts: The typology of RCVs will be looked into further detail in the preparation of the terms of reference of the regional tenders. A transitory period will be considered commensurate with the depreciation of the vehicles.</p>
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10.	Malta Chamber – 01/02/202	<p>General Points</p> <ul style="list-style-type: none"> • The Chamber underlines it is taking firmer position on role of private enterprise in waste management being too limited. Current WMP is the least open to involvement of private enterprise compares with previous versions. Malta Chamber requests for the Waste Management Plan to create a space for discussion on the role of private enterprise and private-public partnerships. Through the space created for this discussion, the details of the role of private enterprise may be established. Inspiration is to be taken from the BCRS in this regard. • The Chamber also wishes the emphasis on Extended Producer Responsibility to be matched by appropriate End User Responsibility, especially when it comes to retail and hospitality. <p>Role of Private Enterprise</p> <p>The Chamber believes that a leading role for private enterprise is essential if the new waste management facilities being planned are to be run efficiently. The WMP speaks of allocating total cost to waste generators via the extended producer responsibility mechanism, but if facilities are not run efficiently, it should not be the private sector which shoulders unnecessary costs.</p> <p>Private initiatives for the development of WEEE dismantling plants are to be encouraged, especially the concept of a dismantling plant for Waste Electrical and Electronic Waste (WEEE) which sells, ships and treats parts separately. We understand that a WtE gate fees are substantial, possibly up to €150. This is a massive difference from the current €20. Such an increase would have a devastating effect on our economy - a discussion with the Government on how it intends to pass on the full costs to the producers of waste would be appreciated.</p> <p>The Chamber suggests that Government should consider looking at different ways of reflecting the real cost of treatment in different market sectors by potentially revising gate fees depending on types of waste, operators through an</p>	<p>Role of Private Enterprise</p> <p>The Plan identifies the promotion of further involvement of the private sector in waste management as one of its strategic objectives.</p> <p>It is not Government’s intention to invest in WEEE dismantling plants as suggested in the feedback provided by the Malta Chamber. In fact, at present, certain waste management facilities are authorised by ERA for the dismantling and treatment of WEEE.</p> <p>Gate Fees</p> <p>Reflecting further the true cost of waste management is not only another of the Plan’s strategic objective, but an obligation</p>
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		<p>ongoing dialogue with the Chamber. An innovation forum for green solutions and sustainable production would also add a lot of value.</p> <p>As regards EPR & the role of PROs, the Chamber points out that of crucial importance is the statement that “Producers of products to bear the full costs of waste management”. Today the PROs are already paying these costs. The difference is that the current amounts may not be the 'true costs', for lack of transparency. As the Waste Management Plan proposes, the amount to be paid by the PROs is solely at the discretion of Local Councils, Regional Regions and Wasteserv. This means that all inefficiencies, poor quality etc will be financed by the PRO. The Chamber feels that this is not an acceptable situation in a free market, especially when there is little room for private sector involvement.</p> <p>The Chamber observes that this effectively includes:</p> <ul style="list-style-type: none"> • Cost to collect and deliver waste to a facility; • Cost of the treatment (for example sorting at an MRF) through a gate fee; • Cost of exporting the recycled products (some of which are currently at a negative value); • Cost of incinerating the resultant RDF at the local incinerator (post 2023) and therefore paying the gate fee; • & cost of landfilling any remaining items that are not suitable for either recycling or incineration. <p>Since, most facilities are state owned and run. It is a fact that the private sector can operate a facility at a lower cost than the state, the Chamber questions whether the Government intends to privatize certain aspects of waste management. The Chamber considers the Beverage Container Refund Scheme to be a good example.</p> <p>The Chamber emphasises that it wishes to avoid a situation where due to delays or lack of enforcement, that it is the producers who end up paying the price. A</p>	<p>emanating from the Waste Framework Directive.</p> <p>The position of the Malta Chamber is somewhat inconsistent on this matter. On one end, it puts emphasis on matching Extended Producer Responsibility by appropriate End User Responsibility, especially when it comes to retail and hospitality, and on the other end, it notes that increases in gate fees would have a devastating effect on our economy. Changes in gate fees are a reflection of End User Responsibility.</p> <p>The WMP states that gate fees shall be revised, after careful consideration of the impacts such would have on the economy, and more importantly such fees would be differentiated with the ultimate scope being incentivising waste separation by all end users.</p> <p>Dialogue with interested parties will be held as a matter of principle.</p> <p>EPR and the role of PROs Producers are obliged at law to finance the management of waste generated as a result of their placement on the market. The full costs of waste management include</p>
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		<p>case in point would be if Malta were to be fined by the European Union and this cost is translated to producers. The Chamber believes in an increased role for PROs in other waste streams such as tyres, mattresses, and other areas where synergies and opportunities may be identified proactively.</p> <p>The Chamber also cautions against applying EPR in a heavy-handed manner leading to producers ending up bearing the cost of illegal dumping and the littering of products they produce in a way which is outside of the producer's control. This should not be the way to tackle illegal activities, as it goes far outside the scope of producers' operations. While this is all linked to EPR costs under the Single Use Plastics Directive, and the EU Commission will be conducting a study to determine the cost calculation model, if the costs are at the sole discretion of parties other than the PRO, then there is a barrier to the free market.</p> <p>Public-private partnerships and Different Waste Streams</p> <p>The Chamber acknowledges that due to Malta's size and therefore also due to waste volumes, there are limitations to the role of private enterprise in certain projects, especially those requiring scale, where there is thus less room for competition. In such cases, however, the minimum expectation is the pursuit of public-private partnerships aiming at maximum economic efficiency and efficiency in material recovery, including of organic waste, in order that the EU targets are achieved and fines are avoided. The Chamber is recommending that through such initiatives, the private sector be given the opportunity to handle different waste streams and produce higher quality waste products as resources.</p> <p>The Chamber underlines that MRFs and WEEE treatment plants offer potential opportunities for such partnerships in the public interest. Synergies with the private sector are to be pursued in whichever innovative and promising means and structures are available. It suggests the establishment of a public-private partnership to create a dedicated facility for the transformation of organic waste into compost and a separate dedicated facility or facilities (MRFs) for the sorting and sale for recycling of dry recyclables (plastic, paper, card, glass, metal).</p>	<p>as listed by the Chamber the various stages of the waste management cycle, hence what is being reproduced corroborates with the obligations at law and does not include any provisions beyond that.</p> <p>Expanding the EPR framework as suggested by the Malta Chamber to include other waste streams is a concept which is already included in the WMP for various waste streams. Please refer to the following measures: WMRO_EPR24, WMRO_EPR25, WMRO_EPR27, WMRO_EPR28 and WMRO_EPR29.</p> <p>The size of the country results in singular facilities for certain specific waste streams. At this stage, Government still considers such singular facilities to be operations of last resort, the management of which is still best served by WasteServ.</p> <p>Whilst Government positively acknowledges the Chamber's contribution towards the BCRS project, it considers it prudent to await the implementation phase of the scheme in order to establish the efficiency levels the private sector can achieve in the context of an operation</p>
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		<p>The Chamber feels that current plans for organic waste bear scrutiny, maintaining that they envision the production of digestate which will then be dried. It proposes that a more advantageous economic solution would be to allow the private sector to invest or co-invest with a public entity, in a facility which will produce digestate and compost it with garden waste to produce a high grade compost with market value. Out of 100kT of waste entering, one is able to get 30kT of compost. At 30T applied per hectare per year, 1000 hectares can be treated per year. This will also increase the organic matter in the soil, which increases water absorption, decreasing flooding during heavy rain events and increases the capacity of the soil to grow vegetables, trees and other plants, therefore having an economic and environmental value. The Chamber proposes that unwanted compost could be exported.</p> <p>While the Chamber understands that the Government plans to build an anaerobic digestion plant with a pasteurization process to produce digestate that is acceptable for use with soil, it notes that no plans were presented to tackle green waste. It underlines that green waste can easily be treated in an in-vessel composter, acknowledging however that Malta has had a bad experience with the in-vessel composter in Ta' Qali or a windrow system. It proposes that with such a system in place, digestate can then be mixed with composted green waste at the windrow system to create a better compost that could offer biodiversity gains when the resulting compost could instead be applied to land, with the added benefit of carbon capture and storage in soils and the production of a local product with economic value.</p> <p>It also proposes gifting compost to farmers (10cm thick layer 2x/year) and training them not to till the soil, as tilling emits CO₂ whereas applying 1 ton of compost sequesters (absorbs and stores) 30kg Carbon instead.</p> <p>The Chamber also proposes the introduction of clothing and textiles sorting facilities in Malta.</p>	<p>where there is one operator. Should such positive outcomes ensue, Government will consult with stakeholders at the appropriate time it feels there is the potential for other state-run facilities to be devolved to the private sector.</p> <p>In the meantime, Government's sensitivity to help in reducing the cost of waste management to producers is enshrined in the regionalised model for waste collection which aims to achieve better economies of scale.</p> <p>Public-private partnerships</p> <p>More private sector investment in WEEE and textile treatment facilities are welcomed and in line with the Plan.</p> <p>Government aspires to meet its recycling targets and as such will be commissioning both an MRF and an OPP with the latter's process reflecting the ideas put forward by the Chamber.</p> <p>Extended User Responsibility</p> <p>As suggested by the Malta Chamber, incremental gate fees at the Magtab landfill are contemplated through</p>
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		<p>Construction and Demolition Waste</p> <p>With regards to the proposals within the WMP to amend the Building Regulations the Chamber suggests the following:</p> <ul style="list-style-type: none"> • We need to define the percentage as percentage of volume. • This should be a short-term measure implemented immediately. • Government needs to incentivise by means of tax reduction or stamp duty reduction for buildings with a high percentage of recycled materials and even further reductions for buildings using 60% recycled materials. • Government projects need to lead by example and stipulate a minimum percentage of recycled material used. <p>Additionally, the Chamber opines that C&D waste cannot simply be regulated solely by adhering to a percentage of a whole building construction project including recycled materials. In their opinion a major problem for Malta is that most of the C&D waste is wasted and not reused which is a missed opportunity. To this end the Government should legislate for ensuring such wastes are recycled.</p> <p>Further to this The Chamber suggest that materials used to build and finish the building should be composed of at least 60% recycled material by 2030. This is a different approach than that of the building that should contain a percentage of recycled material, as that in of itself will not balance the flow present nationally on C&D waste. With carbon emissions in mind, The Malta Chamber is proposing a doughnut economics approach to address the usage of materials in different industries, in order to establish the level of recycling material used for each industrial stream. Over the next 3 years, Malta would develop a different carbon emissions doughnut for different industries, and then shift towards a monitoring approach.</p>	<p>Construction and Demolition Waste</p> <p>The Construction and Demolition Waste Strategy is an integral part of the Waste Management Plan, and provides for specific measures for the management of C&D waste.</p> <p>The Construction and Demolition Waste Strategy for Malta published for public consultation aims to identify options for the management of waste arising from construction and demolition activities, by primarily addressing the current issues within the sector as well as highlight the possible short term and long-term measures to be adopted, with a view to shifting the treatment of such waste from backfilling to the re-use and recycling.</p> <p>One of the measures presented in the Strategy is to develop a new regulatory framework directed at the management of C&D waste, including the insertion of minimum targets, with the aim to properly manage C&D waste, promote a transition towards a circular economy and promote the development of secondary markets for end-of-life resources.</p>
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<p>11.</p>	<p>Green MT (Joe Attard) – 01/02/2021</p>	<p>Holistic Recommendations:</p> <ul style="list-style-type: none"> • Increase landfilling fee to its real cost within three years 2021-2024 • Landfill fee to be paid by commercial sector and introduced through Local/Regional Councils by 2025 latest • Legislate mandatory separation of waste at source for commercial establishments and residents with immediate effect. • Build the required infrastructure to meet the Plan with the involvement of the private sector through different scenarios available on the market. <p>EPR</p> <ul style="list-style-type: none"> • Define correctly Extended Producer Responsibility through an All Actors Approach. Extended Producer Responsibility is not Exclusive Producer Responsibility • All Actors Approach is to identify roles of all actors and their related responsibility • Mandatory separation of waste at source remains the backbone of the success of EPR schemes • Enforcement of EPR obligations by Authorities and or legislation leading to a clearing house would aid future success in this field. • Market still needs to be driven by competition despite economies of scale issues. • The establishment of a clearing house is required to manage existing PROs and future PROs (if any) • The introduction of more DRS' will impinge on the operational present costs of schemes and since DRS' are now the EU's preferred option of managing end-of-life products, the final plan needs to meet the current EU targets. • The document highlights a discriminatory approach to different waste streams in relation to the financing of schemes related to the current scenario: <ul style="list-style-type: none"> ○ In relation to Packaging and Packaging there is an insistence to move towards one operator, one PRO , in WEEE a fee issued by the Competent Authority to the PRO so that it can only charge 	<p>Holistic Recommendations:</p> <ul style="list-style-type: none"> • The WMP addresses the revision of facility gate fees which are intended to be introduced in the medium term. The implementation of this measure necessitates stakeholder dialogue and an assessment on the impacts of such on the economy. • Once introduced the revised gate fees will be payable by both the commercial sector and the Local/Regional Councils. • The WMP commits to the enactment of legislation mandating obligatory separation in the short term. • The size of the country results in singular facilities for certain specific waste streams. At this stage, Government still considers such singular facilities to be operations of last resort, the management of which is still best served by WasteServ. Whilst Government positively acknowledges the private sector's contribution towards the BCRS project, it considers it prudent to await the implementation phase of the scheme in order to establish the
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		<p>Packaging and Packaging Waste</p> <ul style="list-style-type: none"> • The setting up of a Clearing House to ascertain a fair and level playing field for any operator both current and future. • Enforcement of regulations through an ‘Enforcement Team’ financed by both producers and Authorities. • Authority (ERA) to audit individual producers with those in breach of legislation (normally reduced declarations) facing legal proceedings and penalties. • Change in legislation to ascertain that any on line purchases fall in line with Packaging Regulations. • Increase economies of scale by allocating through ‘the Clearing House’ Regional collections to Individual Schemes with same obligations to all Local Councils within that region without the further need for individual Local Councils or Regions to issue any tendering. The introduction of a new service level agreement. • Individual Schemes to pay Regions for actual recyclable waste collected in weight. • The establishment of a ‘National Bring in Site Policy’ in line with today’s societal needs. The provision of one site for every 3000 residents should be reduced to one site for every 1000 residents. <p>WEEE</p> <ul style="list-style-type: none"> • The introduction of an ‘All Actors Approach’, shared responsibility to include retailers and also distributors/ EEE installers, so that actors are identified further in the loop. • Current F Gases regulations to be regulated by ERA and not MCCA. • Establish a WEEE collection system from Households independent of Bulky refuse system. • ‘Clearing House’ to identify which Scheme collects door to door from any Local Council. • WEEE collected from Local Councils by approved Scheme to be diverted to Authorised facilities registered and permitted with the Clearing House 	<p>Regulations), namely the responsibilities of all actors involved in any EPR scheme must be clearly defined. The new measures on EPR, in fact, need to be read and construed with the new Legal Notices transposing the amended Union waste package.</p> <ul style="list-style-type: none"> • The WMP does not a priori restrict the role that private economic operators can play in the course of the next ten years. On the contrary, the government is fully aware of the importance of private operators for the Country to move towards a true circular economy. In this context and in line with the EPR principle, by no means the proposed measures indicate that producers/PROs should make use of the government-run waste management infrastructure. • Enforcement of EPR obligations is the exclusive responsibility of the national regulator on the environment, that is ERA. • As per amended Waste Framework Directive, in case of competing PROs, Member States shall appoint at least one
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		<ul style="list-style-type: none"> • Government should consider the devolution of CA Sites to operational Schemes in relation to WEEE and a number of other waste streams. • The Competent Authority needs to cease from issuing Environmental permits for any kind of WEEE storage or dismantling or treatment at currently or future permitted scrap metal facilities. • CENELEC Standards for treatment facilities to be implemented in a stepped time frame in order to ascertain that current bona fide operators involve themselves step by step in this upgrade. • The making available of EU funds for training, technical expertise for both regulatory personnel and operators. • Enforcement across the sector needs to be improved radically from regulatory to on the ground implementation. 	<p>body independent of private interests or entrust a public authority to oversee the implementation of extended producer responsibility obligations. As such, the overseeing of the implementation of the EPR principle cannot be entrusted to anybody featuring representatives of PROs.</p> <ul style="list-style-type: none"> • By way of clarification, the establishment of deposit-refund schemes is highlighted in the new waste legislative package as an example of those measures that Malta might take to reflect the concept of waste management hierarchy (e.g. to encourage the reuse of packaging) and not as the preferred option for managing all end-of-life products. Similarly, the aforementioned package does not include any obligation on Malta to establish additional deposit-refund schemes. • With regards to the proposed measure WMRO_EPR14, the intention is to ensure that the fees charged to producers by PROs are reflective of the full costs of the management of the
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			<p>WEEE arising from the EEE placed on the national market by the relevant producers, with a view to ensuring the financial sustainability of the entire system in the long run. With respect to batteries and accumulators, the study referred to in the proposed general measure WMRO_EPR1 will inter alia look at the financing of the current EPR system on batteries. In addition, the Construction and Demolition Waste Strategy published for public consultation is introducing a measure to explore ways to implement the polluter-pays principle for construction and demolition waste, whereby developers, as the waste producers, would bear the costs of waste management, including for the necessary infrastructure and its operation.</p> <ul style="list-style-type: none">• With regards to ELVs, it is to be noted that to date, there are no PROs established; the EPR principle is implemented differently in the ELV sector when compared to other streams (to note that the ELV
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			<p>Directive will be reviewed shortly); one of the most important measures proposed is the carrying out of a comprehensive review and assessment of the ELV sector, which will also look at its financing. This review, which will form an integral part of the overall review of the EPR framework in Malta, might result in legislative initiatives to improve the implementation of the EPR principle at the national level.</p> <ul style="list-style-type: none">• Details pursuant to EPR on SUPs will be tackled through the legislative initiatives that the Government will undertake to transpose the related articles of the EU SUP Directive.• To date there are no EPR schemes established at the national level for waste oils, tyres, textiles and non-packaging paper and therefore such details should be dealt with in the context of the potential legislative initiatives that the government might take to implement the measures proposed in the new waste management plan.
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		<p>Waste Prevention</p> <ul style="list-style-type: none"> • Fiscal incentives have to be in place for repair and reuse centres in relation to resale of products with a lesser VAT rate or VAT free. After all at the beginning of their life cycle these products would have paid VAT . This would mean that whilst it is expected that individuals leave a product which could be repaired and resold at a centre for free, the centre would be able to sell this product VAT free but documents the sale. • Retailers should not be made to reduce their earnings if they support an environmental cause. • Eco Labels are a standard issue across The European Community and they are driven by private initiatives and not through Government ‘owned’ labels • Hotels and tourist accommodation should have a guideline to follow but no standard waste prevention messaging should be in place. One has to realise that in 2021 individuals make well informed choices. • Individuals should have the exclusive option of whether to receive or otherwise, unaddressed mail. It is however important that this is latched with fees relating to EPR Schemes on paper. • EPR Schemes and Retailers should lead this initiative and Government should only facilitate [WP_EA5 Encourage the display of lifespan information and repairability information on electrical items at the point of sale.] In this respect individuals make choices as to where they purchase their final products. • Establish legislation differentiating between a ‘best before date’ and an ‘expiry date’. • The removal of VAT on the sale of repaired products or products who are sold for a second time should be removed. Legislation should be in place through amendments to VAT Act. • Paper free offices is a futuristic target for many countries, however it is imperative that an overhaul of legislative measures is studied prior to taking up such initiatives. 	<ul style="list-style-type: none"> • The two main PROs read the provision related to one or more PROs in a diametrically opposite manner. This can only lead to the reinforced notion that Government has not taken a decision in this respect. <p>Waste Prevention</p> <ul style="list-style-type: none"> • The introduction of fiscal incentives to promote repair and reuse is envisaged as per WP_EI2. The implementation details will ensue at a later stage. • The development of standard messaging for hotels is a voluntary measure and one intended to provide assistance. • With respect to unaddressed mail, WP_L5 stipulates that legislation will be introduced to enable people to opt-out from receiving such mail. • Paper-free offices are indeed something to aspire to in the future hence its inclusion in the long term to enable proper assessments in the meantime. • Discussions related to measures on the prevention of C&D waste will be framed within the context of the Construction and Demolition Waste Strategy.
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		<ul style="list-style-type: none"> • Packaging free products placed on the market that are currently VAT applicable should be studied to decide whether it would create a feasible approach if these no longer paid VAT . One needs to assess the cost of the environmental damage created against the payment of VAT and packaging waste fees and accordingly take balanced decisions. • Introduce environmental eco tax on products that are virgin, ie limestone stone blocks, (increase the price by an eco tax) in order to promote sale or manufactured stone blocks or reconstituted stone products emanating from C&D waste. • Retailers should not be burdened with costs relating to holding on to unsold food as thus would further entail additional costs on commercial sectors. • Discussions to be held with stakeholders from an early stage to define which materials or products attribute to the 15% threshold, and with a time frame to meet the said 15% threshold. A consultation document should be issued in this respect prior to any implementation. • The removal or reduction of VAT on such initiatives would be an incentive in the right direction and should be considered as a short -term measure. In a consumer orientated society we tend to use clothes only a few times before we either hand them over freely at no cost to others or forward them to re-use or re -loan shops. It is a measure which could easily be addressed in the short term. <p>Waste Collection</p> <ul style="list-style-type: none"> • Local Councils should remain the administrators of waste management within their localities through a Regional approach. • Local Councils should be provided with a time framed target to reduce mixed waste from black bag, increase organics and separated waste (recyclables), through Regions • Whilst most Local Councils can meet the twice weekly collection there would still be those Local Councils who would initially need more than 	<ul style="list-style-type: none"> • The implementation details of various measures will be discussed with interested parties in specific fora, the objective of the WMP2021-2030 is to provide the strategic direction. We note your suggestions with respect to implementation. <p>Waste Collection</p> <ul style="list-style-type: none"> • The roles and responsibilities of local councils and regions are defined in the Local Government Act. Further delineation of such roles and responsibilities when it comes to the finer details fall within the responsibility of the respective Ministry. • The allocation of targets to Local Councils is not contemplated in the Plan in the short term since the focus is on the stabilisation of the regionalisation process. The request to allocate targets to Local Councils conflict with the request to accommodate /entertain additional collections of mixed waste for certain LCs. • The WMP seeks to propose holistic reforms that are to the benefit of the entire country.
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		<p>two collections of mixed waste. This requirement would need to be assessed and entertained.</p> <ul style="list-style-type: none"> • One assumes that PRO's will lose a quantity of plastic, metal and glass through the introduction of the Beverage Container Refund System and as such this would primarily reduce kerbside collection to the extent that one collection weekly might not even be required. • A weekly collection for paper and board would be required inclusive of non- packaging paper . Whilst EPR is being considered for non-packaging paper its collection is already being made by existing PRO's 'free of charge' to those producers placing non packaging paper on the market. • Local Councils should have a three/five-year target to meet these targets. Targets are to be set by Regions according to population and should targets be met compensation is made available to Local Councils through a prior agreed methodology. • Local Councils via Regional Councils should employ through Government funds Street Environmental Officers, through a community Scheme in line with current Community Police project which has proven to be a success. • Local Councils have diverse needs and as such a holistic approach to Waste Management would not be the right direction. Whilst economies of scale might appear to be feasible on paper through regionalization it is not feasible in practice in Malta's social dimension at present. As thus whilst Regions should establish a contract for a number of Local Councils , Local Councils will remain responsible for administration issues. • The establishment of garbage points should be removed from the waste management plan. • The introduction of a free black bag to residents should not be part of the plan. Collection and treatment of mixed waste comes at enormous fees and as such black bags should be bought from retail establishment at a price which includes a high environmental fee. Enforcement of any kind should be made on ascertaining that right bag is used on the right day with legislation also including the contents of the individual bags. 	<p>Throughout the development of the WMP the specificities of each region have been taken into account as far as possible within the context of needing to provide a holistic approach to waste management for the country. To this end whilst we take on board the valid concerns these must also be balanced against the difficulty in adopting a plan that would be piecemeal or wholly catered for one particular region, sector or interest group. Hence, in line with the Local Government Act which stipulates that Regions are to issue waste collection tenders on behalf of Local Councils, it will be up to the discretion of the Regions to allow for (i) additional collection of organic waste [only] on Sundays and (ii) the introduction of smart waste collection solutions for residents, as long as these are equipped with restricted access control. No compromise is expected for the collection of mixed waste (black bag).</p> <ul style="list-style-type: none"> • With respect to the collection of recyclables, same principle
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		<ul style="list-style-type: none"> • The additional environment tax included in the bag would be hypothecated towards Local Councils via Regions in order to increase their income for establishing better waste management. • Local Councils via Regions should have increased funding to establish underground bins for all waste streams which would be utilised against a card payment system. In this way residents who have unorthodox hours for disposing of their waste have no excuses. In addition communities today face societal changes that cannot be harmonized and as such services should be available round the clock against payment. • Producer Responsibility Schemes should now be able to be provided with Regional collections both for Packaging and Packaging Waste, Non Packaging Paper Products, Textiles, WEEE, and Glass . PRO's should be responsible for Region or Regions allocated to them by the Competent Authority. PRO's should now be able to discuss with Regions payment for services against weight collected instead of trips made by individual carriers as it stands today. This should incentivise collections to be done in a correct manner. • Local Councils via Regions should have increased funding for waste collection so that tenders can include for Euro 5 and Euro 6 vehicles and also for the introduction of Electric vehicles for certain roads. Tenders at all Local Councils should include a high standard level of service provision and a time frame is established nationally through TM for use of Euro 5 vehicles and at a later stage Euro 6 vehicles. • The wording New collection vehicle fleet should be changed to an upgraded vehicle fleet to meet current obligations. Whilst there are a good number of vehicles, RCV's that are not Euro 5 operating in the market, Euro 5 vehicles should be provided with a time frame to be agreed beyond which only Euro 6 or better vehicles can be used for collection contracts of Local Councils and also at private sector level. • This a time frame is to be established in liaison with TM to ascertain that the sector will not be jeopardized. A number of waste carriers have last December bought Euro 5 vehicles against bank loans which need to be 	<p>applies. Since harmonisation is the principle being followed, one would establish what's feasible and then complement with additional services where there is the need.</p> <ul style="list-style-type: none"> • Yes, the weekly collection of paper would be inclusive of non-paper packaging. • The suggestion of extending the Community police project should be taken up together with the responsible Ministry. • Regionalisation is the way forward as established in the revised Local Government Act. The role and responsibility of the Local Council as being the contact point for residents, will be retained, the management of the new waste collection contract will fall under the responsibility of the Region, but this does not preclude Local Councils from being part of its implementation. • The WMP does not mention garbage points. • Within the context of the commercial waste reform, it is envisaged that in line with Government policy not to burden residents with the cost
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		<p>met. Eliminating such Euro 5 vehicles with a stroke of a pen would be detrimental at this stage</p> <ul style="list-style-type: none"> • In addition any tender issued for Regions should include experience and also the provision of log books of vehicles (RCV's) issued by TM and made available at bidding stage. This is imperative if Government wants to show the sector that it intends to give current operators a change to continue operations although with an upgraded standard of service • The vehicle type to be used for the services needs to be discussed by Regions with Local Councils individually. Although holistic approaches are sometimes deemed as setting parameters for economies of scale, in countries as small as Malta where society has different needs and also logistics require different service provisions it would be detrimental to cut a straight line. The use of split RCV's or otherwise should be determined after discussions with waste carriers and Local Councils. • Regions and Local Councils and waste carrier need to affect a time study to determine time frame taken to effect actual collections in each Locality and base RCV usage or shift allocation as required at different Local Councils. Regions have small Local Councils and large Local Councils and as thus logistics have to be planned differently. • The plan requires Local Councils to have a Bring in Site every 3000 residents. This is a far cry from the EU's technical guideline of 1 for every 526 residents. Schemes shave requested one bring in Site per 1000 residents which is the better scenario. • Local Councils via Regions should adopt a National Policy guideline in relation to Bring in Sites, a national policy which needs to be part of this final plan. • Local Councils via Regions should be allowed to charge residents for waste disposal. This would be a medium-term measure so that it gives stakeholders ample time to ascertain well planned implementation. This would be in the form of charging residents for the mixed waste sent to landfill divided per capita through Local Council Billing. Billing would be affected according to residents register available at Arms Limited for billing Water and Electricity. The cost of disposal according to the Landfill 	<p>of waste management, free bags will be distributed in a manner that it reflects the character of MSW. This means that if citizens generate an average amount of waste and diligently separate it, the likelihood is that they will not incur any additional expenses from buying extra bags. If however, individuals fail to separate their waste, they will automatically require to purchase waste bags at market prices incurring costs for their actions accordingly.</p> <ul style="list-style-type: none"> • The deployment of smart bins with access control is already contemplated in the Plan, initially for commercial establishments. • The relationship between the PRO and the Region is one whereby the PRO will be held financially responsible to finance the collection of recyclable fractions. • The phasing in of Euro 6 vehicles to allow for the use of Euro 5 RCVs is being considered. • Suggestions relevant to the content of the tender
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		<p>Directive would need to be established and each Local Council to pay gate fees accordingly,(a full cost of waste disposal) and not the current Euro 23.60 per ton (VAT included).</p> <ul style="list-style-type: none"> • Collection Schedules within Local Councils should be the prerogative of the Regional Council. However, collection schedules are to be agreed between individual Local Councils within the Region • Local Councils should encourage the setting up of Bottle Recycling centres within their Localities once the Beverage Container refund system comes into being. • Regionalization tenders for waste management should be issued in 2023 and should start of operations in 2024 thus providing enough time for stakeholders to formalise discussions. In addition, the 6th Region will only be in place in September 2021 and administratively operational in January 2022. In the meantime, all Local Councils will only extend tenders on a year to year basis only. 	<p>documents for the regional waste collection are noted.</p> <ul style="list-style-type: none"> • The establishment of a denser network of bring-in sites is being discussed in another forum, being there legislative provisions in this respect, policy guidelines are not deemed necessary as specifications will be embedded in the legislation. • Within the context of the commercial waste reform, it is envisaged that in line with Government policy not to burden residents with the cost of waste management, free bags will be distributed in a manner that it reflects the character of MSW. • The intention is to have a harmonised national schedule. The required consultation with Local councils is ongoing. • The WMP is currently addressing the legal obligations enshrined in the Local Government Act. <p>Commercial Waste:</p> <ul style="list-style-type: none"> • The free collection of organic waste from tourism zones in weekends is an interim measure, other than that none
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		<p>Commercial Waste:</p> <ul style="list-style-type: none"> • Commercial waste should be paid for at a landfilling gate fee to be established in line with the Waste framework directive. The current abuse is detrimental to both Local Councils and waste carriers and also to Compliance EPR Schemes. The plan should outline that current collection systems from commercial establishments being made for free need to stop in order for private industry to ascertain that such function be made by the private sector. Government entities cannot be allowed to offer services to commercial establishments free of charge for any waste stream. • The proposal for free Saturday and Sunday collections of organic waste in tourism zones is uncalled for. Commercial catering establishments need to ascertain that they are registered with a waste carrier who has the obligation to be collect their waste and get payment for his services. Such an introduction of a service would add insult to injury in respect to current operations. • The provision of educational support is a welcome initiative and if done in the short term might prove beneficial to the commercial sector awareness. • Mandatory separation of organic and recyclable waste from all households and commercial outlets – this proposal was made to Government for the 2014-2020 Waste Management Plan and it did not come into being. Mandatory separation of waste by all generators is a must and should be the first legislative mood of this waste management plan. • To this extent the recovery of full cost of waste management should keep in mind the operator of the service. Private commercial sector establishments contract a waste carrier who can provide a decent service at a decent cost. However, Wasteserv gate fees would need to rise in coming years to meet the cost of investment in the pipeline and also to meet recurrent expenditure. In order to set a balance for this gate fee, stakeholders need to discuss a cost methodology that would be 	<p>of the collections for commercial waste is contemplated to be free of charge.</p> <ul style="list-style-type: none"> • The free collection of organic waste from tourism zones in weekends is a incentive to induce separation of organic waste and is a temporary measure. • Awareness raising campaigns, and specific training to industries will be provided for free to equip the workforce with the required skills. We are sure that the GreenMT will support such initiatives as also suggested from your end, to reach out to as many as possible. • The WMP commits to the enactment of legislation mandating obligatory separation in the short term. • The WMP addresses the revision of facility gate fees which are intended to be introduced in the medium term. The implementation of this measure necessitates stakeholder dialogue and an assessment on the impacts of such on the economy.
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		<p>acceptable to both parties. The business community continues to insist that any Government led operation is more expensive than that done by the private sector and as thus the private or commercial sector should not be made to pay for operations at a fee which is exorbitant.</p> <ul style="list-style-type: none"> • In addition the plan does not include enough space for the private sector to be involved in proper waste management issues. Investment does not mean purchase of collection vehicles or hardware. Private industry has shown interest in investing from scratch, land use included, in the setting up of an MRF facility. Government however has opted to take this issue into his hands due to the fact that it is considered an infrastructural project which is of national need. Thus Government does not want to be at the whim of the private sector. The operation of such facilities lies squarely by private industry providing the material feed at all times and as such there could be an agreement between Government and the private sector over such important issues. • Standard waste bags, transparent and in different colours depending on waste stream should come at a cost to everyone, residents and commercial with different bags having different price tag. As outlined these bags should all have an Eco tax included in their cost in order to sustain waste collection and related treatment where required. • There should be no free of charge provision of waste bags of any nature, both for residual or organic. • Smart Waste Depot should be the prerogative of Regions and they should be made available to both the commercial sector and residents against identified access and against payment. • Registration of establishments with Local Councils should take place in the short term and such establishments are all those who do not have an environmental permit. As such legislation has to be established to ascertain that all kinds of establishments will register with the Local Council who will intron forward all information to the Regional Council in order for this information to be used for tendering purposes too. Such registration should take place by mid calendar year 2022. 	<ul style="list-style-type: none"> • The size of the country results in singular facilities for certain specific waste streams. At this stage, Government still considers such singular facilities to be operations of last resort, the management of which is still best served by WasteServ. Whilst Government positively acknowledges the private sector's contribution towards the BCRS project, it considers it prudent to await the implementation phase of the scheme in order to establish the efficiency levels the private sector can achieve in the context of an operation where there is one operator. Should such positive outcomes ensue, Government will consult with stakeholders at the appropriate time it feels there is the potential for other state-run facilities to be devolved to the private sector. • Within the context of the commercial waste reform, it is envisaged that in line with Government policy not to burden residents with the cost of waste management, free bags will be distributed in a
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			<p>manner that it reflects the character of MSW.</p> <ul style="list-style-type: none"> • Smart waste depots shall be the prerogative of the regions, however as a first stage these are contemplated for use by the commercial community. • With respect to registration for commercial establishments with Local Councils, the intention is to target the smaller establishments not governed by the environmental permitting process as mentioned in your suggestion. <p>Compliance and Monitoring:</p> <ul style="list-style-type: none"> • Enforcement of EPR obligations is the exclusive responsibility of the national regulator on the environment, that is ERA. • Dialogue with other authorities has been and will be further undertaken to ensure stronger enforcement action. • As per the measures listed in the WMP, it is envisaged that the enforcement capacity within ERA will be strengthened. • The name-and-shame approach has been included in the measures of the WMP.
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		<p>Compliance and Monitoring</p> <ul style="list-style-type: none"> • A centralised WEEE Collection point – this facility is already being built and as such should not even have been a part of the plan. The said facility at Hal Far intends to house incoming WEEE and other waste streams. • Enforcement is a crucial issue and needs to be supplemented by EPR Schemes or DRS Schemes. Enforcement should not only be perceived to be made but it should be seen to be made and EPR (PRO’s) should be a part of enforcement methodology. • Changing waste legislation in Malta takes far too long and whilst the plan correctly points this shortcoming, one needs to ascertain quicker legislative changes if we are to meet our environmental obligations. • The importance of having other Authorities on board beyond the Competent Authority, ERA is crucial to the success of the plan. • Illegal dumping is an issue which needs to be addressed both legally and on the ground. Whilst it is difficult to catch perpetrators, it is essential that on the road inspectorate division within ERA increases. Payment for the services should be made through fees related to waste management permits that currently need no fee for obtaining. Enforcement comes at an expense and as such it needs to be sustained in the best way possible. • A name and shame approach should be in place in order to ascertain that wrong doers are exposed to public and social media • It is recommended that an individual that does not comply to the above (increase the administrative fee for de-registration of any vehicle not disposed of at an authorised treatment facility) cannot have any vehicle license renewed. This would be additional legislation to the current contravention system. Unpaid contraventions result in the non issuance of road licenses and it should be the case here too. • Economic incentives need to ascertain extremely good practice certified by non -Governmental third party certification. Otherwise we would end up with entities applying for economic incentives where the environment has not gained anything at all. 	<ul style="list-style-type: none"> • Discussions on enforcement action on ELV management with TM are ongoing. • The development of privately-owned storage depots is not intended to promote larceny as that is what we are aspiring to clamp down. Rather such depots would be permitted and monitored and data on waste management activities therein would be reported to the authority. • Competition issues are regulated by a specific body with whom you may wish to take up this matter.
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		<ul style="list-style-type: none"> • Problematic waste streams within the plan need to be identified at an early stage and discussions with relevant authorities should take place to tackle the technical and financial and environmental solutions to these problematic waste streams. • This measure (Encourage the development of legal privately-owned storage depots for temporary storage of unsorted waste streams, including through an economic incentive) is to be addressed with extreme caution. From the beginning it is to be said that we should not be encouraging or setting up a system whereby we authorise current larceny and do it yourself illegal facilities. At face value this approach is unacceptable both to the environment at large and to bona fide operators. We cannot introduce privately owned depots at a cost to the environment. The plan in itself is an avant garde one and we would not like to see this approach being ruined by such an initiative. • Whilst the words are boldly outlined, past experience has shown that Wasteserv Malta Limited, although an operator of a last resort has over the years taken over operations which were previously done by the private sector and has also entered into direct unlawful competition with the private sector. There are many operations being done today by Wasteserv which can be handled by the private sector. Whilst private operators welcome the plan there is need for translating words to facts in relation to economic incentives for waste management private operators. 	
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12.	Friends of the Earth Malta, Moviment Graffiti – 01/02/2021	<p>Appreciates the effort of this new Waste Management Plan to put emphasis on reducing waste generation, as per EU Waste Hierarchy. Respondents express concern about the delivery of such measures and the time period for which they are envisaged. Concerned also with the focus on individuals and households. The strategic objectives do not make it clear that waste prevention is a priority or what the overall objectives are. Urges the caution of relying on “awareness-raising campaigns” considering the urgency of the waste situation in Malta and that costs/efficiency of past public awareness-raising (such as “Don’t waste waste” or “Save our Blue” or “Sort it Out”) should be considered to see how efficient they have been and to go further. In addition to awareness-raising campaigns, regulations are required for mandatory measures for waste-reduction and recycling for commercial and industrial sectors. An awareness campaign should this time include details on composite materials, thin plastic films, pharmaceutical products, textiles, etc.</p> <p>Wishes to stress that while it is important to maximise value from waste, it is also important to remember the economical, social and human costs behind the destruction of nature through the production of waste and these alone should suffice to justify the change. This plan should be linked to other policies and plans such as tourism and development increase, amongst others.</p> <p>Concerned about the accountability of public authorities to ensure implementation and reaching of targets. How does this government guarantee that future legislative and private operators be held accountable?</p> <p>Stresses the importance of breaking down the targets to local council region level and supporting local councils to help reach these targets with a realistic budget. Local councillors should be given the opportunity to propose a plan for enforcement to help reach such targets.</p> <p>To improve accountability, suggests that bi-annual reviews should be established, with the publication of progress, including KPIs and next steps, to build upon measure MC_WMF3 “Set up a system for publicly disclosing compliant and non-compliant offenders”</p>	<p>Timeframes have been estimated to be realistic and some require preparatory actions to be completed. Continuous awareness-raising is necessary to keep up public engagement. Campaigns will focus on End of Life Vehicles and Waste Oils in alignment with new EPR measures – two topics which have not yet been targeted nationwide. The new phase of the Saving Our Blue campaign will be focused on hidden plastics in items such as coffee cups (composite) and textiles (microfibers from synthetic fabrics).</p> <p>Details on accountability and enforcement of private operators are outlined under Chapter 7: Ensuring Compliance and Chapter 8: Data Management. MECP will be responsible for ensuring the implementation of the measures laid out in this Plan.</p> <p>MECP is working closely with Local Councils and Regions to develop the most effective way forward particularly on waste collection measures.</p>
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		<p><u>Waste prevention and reuse</u></p> <p>Suggests a stronger commitment to fiscal incentives to encourage repair and reuse activities and that an educational campaign should promote second-hand buying over fast fashion purchasing. Requests whether promotion of repair and reuse activities will include the development of structures such as second-hand shops to reuse clothing and that repair activity should be exempt from VAT, including activities which are currently taxed at 5% such as minor repairing of: a) bicycles; (b) shoes and leather goods; (c) clothing and household linen (including mending and alteration).</p> <p><u>Specific streams:</u></p> <p>1. <u>Food waste</u></p> <p>a. There is no mention of a measure to limit food waste from restaurants, processing and manufacturing. WP_RD3 “develop a reporting methodology for monitoring food waste” (page 101) lacks an explanation on the result of such reporting: what actions might be put in place following the collection of such data? Proposes a legislative change - please refer to the “Food Waste in the Maltese Retail Sector” report which was commissioned by Friends of the Earth Malta in 2020. https://foemalta.org/foodwastereport</p> <p>b. Policies should be in place to ensure that hospitality and retail are not allowed to dispose of leftover food which is in good condition. It must be donated to food banks or charities.</p> <p>c. Households and educational institutions should be educated and encouraged to compost food waste. Systems may be set up for communal composting stations. It can then be sold or used for landscaping in the community. Composting bins in schools would take up this initiative of having more awareness raising on the issue.</p>	<p><u>Waste prevention and reuse</u></p> <p>Regarding structures for second-hand items, measure WP_EI1 “Support the establishment of a re-use and repair centre to promote such practices” will see the establishment of a dedicated facility, with the intention to expand into a network.</p> <p><u>Specific streams:</u></p> <p>1. <u>Food waste</u></p> <p>a. Measures to limit food waste from all commercial establishments are outlined in Chapter 6.8: Addressing Commercial Waste, including training on food waste prevention. In addition, the waste prevention measure WP_V1 “Develop an eco-label or accreditation for supermarkets, retail stores and catering establishments participating in environmental initiatives” will involve collaboration with the sectors on this matter. WP_RD3 “develop a reporting methodology for monitoring food waste” will be developed in line with the ‘common EU methodology to measure food waste’</p>
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		<p>d. In education and awareness raising, MECP presents the problem of coffee cups to illustrate that single-use plastics are sometimes not obvious. Therefore, we suggest going further than the Single Plastic Directive and banning such cups (or other items containing “invisible” single-use plastic).</p> <p>e. There is also no mention on the amount of reverse vending machines that are planned to be installed and if they will fall under the responsibility of the local council or region.</p> <p>f. We believe that measures such as WP_V3 “introduce a voluntary agreement to encourage commitments to reduce waste across various commercial sectors” (page 96) should be planned in the short term and not medium term. Indeed, since it does not require a change in legislation and is not extremely ambitious compared to the targets Malta has to reach, it should be put forth earlier.</p> <p>g. Our concern is indeed that sometimes the timeline does not seem ambitious enough. Indeed, measures such as WP_L9, mandating a minimum of 15% recycled material in buildings (page 95), is scheduled to be enforced as of 2027.</p> <p>h. Gleaning networks can be implemented as soon as possible as this is not a project that requires infrastructure.</p> <p>2. <u>Collection</u></p> <p>a. Regarding the conversion of at least 10% of electric vehicles in Malta’s collecting fleet, it is indicated that it may be worth considering converting the whole fleet to electric vehicles (rather than the required 10%). (page 135). When will such a decision be taken, and when will further details to back this decision be published?</p>	<p>b. This issue will be tackled under the following measures, for which further information can be found in the Plan:</p> <ul style="list-style-type: none"> • WP_L2 “Develop legislation for the diversion of food waste from landfill” • WP_L3 “Limit retail and distribution outlets from discarding unsold food” • WP_D5 “Support the utilisation of digital channels and applications for food redistribution initiatives and food sharing initiatives within communities” – this measure will aim to facilitate the redistribution of surplus food from retail outlets to food banks and charities. <p>c. The policy towards organic waste management is centralised treatment of this waste stream.</p> <p>d. The existence of hidden plastics in items such as coffee cups and textiles will be addressed under the next phase of the Saving Our Blue Campaign.</p> <p>e. The BCRS will be rolled out later this year.</p> <p>2. <u>Collection</u></p>
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			<p>a smoother transition into the new requirements. The obligatory separation is still scheduled to be implemented in the short term, prior to 2023.</p> <p>c. Measure MC_WMF1 is in reference to operators such as private recycling facilities.</p> <p>d. Rather than prohibiting commercial businesses from using the free household collection system, a system is being devised whereby smaller commercial establishments can make use of this system by registering and contributing to its cost. This makes logistical sense particularly noting that the composition of such waste is similar to household waste.</p> <p>e. This is included under WMRO_19: “To assess the feasibility of introducing a hierarchy of fees for facility gate fees to ensure full cost recovery for operational and environmental costs” to determine the most effective way forward.</p> <p>5. <u>Recycling</u></p>
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		<p>f. Figures show wood is not being recycled. Why is this? Civic amenity sites receive lots of furniture items and should be well-suited to processing them. It must be ensured that the facilities are well-equipped.</p> <p>6. <u>EEE and Batteries</u></p> <p>a. Encourage repair centres and retailers to invest in precious metal extraction and the correct sorting of electronic waste. Malta is not restricted by the Waste Electrical and Electronic Equipment (WEEE) regulation directly, however limitations on WEEE should be directed towards retailers. The collection targets can be applied to them and they will become collection centres. Can also apply to battery collection. No systems are currently in place to discourage the public from disposing of EEE with usual household waste.</p> <p>b. We believe that 2027 for a plan on battery recycling/collection is too far away. Such a plan means that we will not be reaching the EU's 2016 collection targets for at least 11 years. The document is not giving any more info on the plan, it just says that a study will be conducted. There are other points not mentioned, such as the current method of disposing (landfill and incineration are banned across the EU). Currently industrial and automotive batteries have no collection targets, since usually those who are discarding such batteries are professionals and will hand over the battery back to the producer. Is this really happening? Is there a database regarding this?</p> <p>7. <u>Industrial Waste and Oil Waste</u></p> <p>It is unsafe for industrial waste to be landfilled so this should be unacceptable. Industries must sort waste and if no system is currently in place to manage their hazardous waste, they should be constrained to manage or export the waste themselves. In all cases where there might be alternative, less-harmful or less-wasteful materials for the industry to use, incentives should be provided for selecting these methods.</p>	<p>requirements for producers of EEE and batteries or third parties acting on their behalf to set up collection systems.</p> <p>In addition, producers or third parties acting on their behalf are required to take the necessary measures to achieve the minimum collection targets laid down in the legislation.</p> <p>In addition, although there are no collection targets for industrial and automotive batteries, producers of such batteries are still required to report on the amount of batteries placed on the market, collected and recycled.</p> <p>Furthermore, as laid down in the WEEE Regulations and the Waste Batteries Regulations, any person disposing of WEEE and waste batteries in the form of unsorted municipal waste is subject to a fine.</p> <p>7. <u>Industrial Waste and Oil Waste</u></p> <p>Feedback has been noted.</p> <p>8. <u>Construction Waste</u></p> <p>Following the feedback received on the Construction and Demolition Waste Strategy public consultation document,</p>
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		<p>8. Construction Waste</p> <p>We are aware of the plan “Construction and Demolition Waste Strategy for Malta, 2020-2025”. However, this plan is too short when taking into consideration the increase in rate of the construction industry. Moreover, this plan does not seem to have started being implemented, despite that we are already in 2021. All PA applications (or those for medium - large developments) should present a study on the construction waste to be generated and a plan for its use/disposal. Those who do not adhere to the plan should be penalized. Dumping construction waste at sea should not be allowed, under no circumstances. With regards to construction waste, we propose:</p> <ul style="list-style-type: none"> • More enforcement and heavier fines for illegal dumping of construction waste in valleys, garrigues, ect to protect biodiversity. • Separation of construction waste so as to recycle material from the building industry when possible, such as mixed mineral waste, iron, wood, glass, textiles, gypsum, ceramics and plastics. • Setting up of stone depots to recycle maltese limestone. • Government incentives to use recycled material in construction such as recycled concrete. Moreover, the government should use recycled materials in infrastructure projects, hence increasing demands for such materials. • When handling construction waste, risk assessments must be carried out to minimise particulate matter emissions. • Surveying more quarries for disposal of construction waste and ensuring proper dumping so as to avoid increasing the particulate matter emission in the surrounding areas. 	<p>the Strategy will cover the period 2021-2030 and will be an integral part of the Waste Management Plan. The C&D Waste Strategy document will present the measures in the strategy as:</p> <ul style="list-style-type: none"> - short-term measures (2021-2025); - long-term measures (2026-2030); and - ongoing measures. <p>Most of these measures are catered for in the C&D waste strategy in a way or another, which Strategy is an integral part of the WMP. In fact the Strategy will include measures such as:</p> <ul style="list-style-type: none"> - Establish Standards for the Construction Industry; - Improve Waste Classification and Source Separation; - Recognise the need for Resource Recovery and Storage Depots; and - Enforce Recovery through Restoration of Void Spaces.
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13.	MHRA – 01/02/2021	<ul style="list-style-type: none"> • Role of private enterprise too limited: the role of private enterprise in waste management is extremely limited compared to previous waste management plans. The government should open up the market and allow for innovative solutions to waste management through public-private partnerships and various initiatives similar to the concept adapted for the Beverage Refund Scheme. This would help to address the quality of waste as a resource through technical issues such as shifting the organic waste product from being digestate to compost, with a market value. The indication is that with what the government is suggesting as target, we will still end using the landfill, thus EU will impose penalties on the country. <ul style="list-style-type: none"> ○ WMP should be led by a PPP: The Waste Management Plan should be innovative and efficient lead by a private-public partnership and not the government alone, as having the private more involved in the implementation of the plan is important to be similar to the process carried out for the BCRS because it will bring costs down and eliminate government inefficiencies. • No higher gate fees: Gate fees should not be increased, as the industry is not able to curb more expenses due to the impact by the COVID-19 pandemic, and if the need arises, then fees should be increased gradually by time. • Lack of space for commercial establishments to store separated waste: Waste separation at source is going to impact both on the resources and storage space, as the majority of MHRA members do not have the necessary space to store waste until collection. After discussions with various stakeholders involved in waste management companies, the feedback given is that our members are ready to do careful planning and tapping into new technologies, however the government should take control that the collection, which will be more frequent, does not generate higher costs on the industry in order to adjust to the greater number of waste streams collections. • Separate collection costs should not exceed existing costs: the separate collection system should be designed in such a way as to render the costs 	<p>Limited role of private enterprise: The size of the country results in singular facilities for certain specific waste streams. At this stage, Government still considers such singular facilities to be operations of last resort, the management of which is still best served by WasteServ.</p> <p>Whilst Government positively acknowledges the private sector’s contribution towards the BCRS project, it considers it prudent to await the implementation phase of the scheme in order to establish the efficiency levels the private sector can achieve in the context of an operation where there is one operator. Should such positive outcomes ensue, Government will consult with stakeholders at the appropriate time it feels there is the potential for other state-run facilities to be devolved to the private sector.</p> <p>Government invites MHRA to put forward proposals on how to translate these principles into tangible action that have the support of its membership and ideally that of any other social partners who represent any other stakeholder group involved in waste management operations.</p>
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		<p>of collection equal to or less than the existing mixed waste collection costs.</p> <ul style="list-style-type: none"> • Not acceptable that organic collection is offered at cost: Most of the accommodation properties currently pay €9.20 daily for waste collection for mix waste. The organic waste collection can only be offered against another cost which the industry feels it is not acceptable since all the accommodation properties contribute by paying the Eco-Contribution for the fact that the industry generates far more than domestic, therefore the industry is already contributing for the generation of their waste. Moreover, the industry is not offered the possibility to have the recycling collection, since again, there will be another charge which is still not acceptable. • Industry needs to be trained on waste separation: to prevent costs going up for our members, the government should invest heavily in giving training to the industry on how the separation at source is implemented so that this will help to keep the costs sustainable for the industry by appointing technical people in the matter and they help the industry to seek solutions to avoid cost increases. The current situation is already very precarious due to the pandemic - the industry cannot carry any more costs to implement the WMP. 	<p>Gate fees: The WMP's plans regarding gate fees will be undertaken from 2024 onwards. Adequately accounting for the true cost of waste disposal is an obligation listed in the Waste Framework Directive. All those involved with this measure will be informed in due time and will be given an indication of what the fees will be within an opportune time window.</p> <p>Lack of space: The volume of waste generated will remain the same, or even decrease. Our aim is for commercial establishments to be aware of what is being thrown away and introduce ways by which they reduce volume of waste being generated. Space limitations should not constitute an insurmountable barrier to waste separation. For commercial establishments which engage their own contractors, the frequency of collection is entirely up to them and stipulate such in their agreement. They can reduce the frequency of collecting mixed waste and instead opt for the collection of organic waste. The point which is not questionable is that waste is to be collected separately. Organic and recyclable waste cannot be mixed.</p>
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			<p>separately by the region according to a schedule in pre-paid bags. This mechanism will be introduced irrespective of the eco-contribution paid by accommodation properties.</p> <p>Industry training on waste separation: As part of the WMP's measures on commercial waste, and in order to support the transition towards the new regulatory framework for the sector, the Environment Ministry will be providing information and training on ways to minimise waste generation, including plastics and food waste, as well as how to correctly separate waste. The Ministry will, together with industry and business representatives, develop and distribution educational material to inform commercial outlets on the new requirements and offer formal guidance on how to properly separate waste streams for recycling.</p>
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14.	Chamber of SMEs – 01/02/2021	<p>Waste Carriers</p> <p>Waste Management plan: “Reform the collection system to increase economies of scale, harmonise collection practices and modernise the collection fleet”</p> <p>Chamber of SMEs believes that while operators in the sector recognise such need and usefulness, there is currently a substantial gap into reaching this, more ideal, standard of operation. There is little opportunity and financially viable options to invest in modernising the existing fleet. In line with this, the strategy should cater for the gradual transformation of the industry. The strategy should cater for aid to assist operators in the transformation and continuous support in changing the market conditions in order to facilitate maintaining this investment and making it feasible. Apart from grants, the Government can also consider tax incentives in this regard.</p> <p>Chamber of SMEs is concerned on the validity of the proposal for split-back RCVs, While recognising certain positive points coming out of this, overall the operators see more negatives, with the Chamber underlining that split-backs will be difficult to get into all areas of numerous localities that will require additional assistance to collect waste effectively. Using this kind of vehicle would also necessitate an increase in the number of trips per day since each section has lower level capacity and there will be scenarios where one side will fill up before the other side fill up and before the collection of that particular waste is complete.</p> <p>The SME Chamber believes that some form of reward/incentive for waste carriers would encourage this sector in taking a stronger stand at source and avoid problems later on in the chain. This would also help greatly in injecting energy into a sector that has been left to its own to tackle the impossible market conditions for decades.</p> <p>Waste Management plan: “Malta’s collection fleet should consist of 10% electric vehicles and increase to 20% by 2025”.</p> <p>The Chamber of SMEs agrees in investing in clean energy but notes that cannot disregard the existing vehicle complement. No vehicles below the level of Euro4/5 should be allowed to operate on one hand. On the other hand however</p>	<p>Waste Carriers:</p> <p>Vehicle typology in new contracts:</p> <p>The typology of RCVs will be looked into in further detail in the preparation of the terms of reference of the regional tenders. A transitory period will be considered commensurate with the depreciation of the vehicles.</p> <p>Use of split-back trucks: Accessibility issues for split-back trucks in some localities/areas are acknowledged. In light of this, the move towards split-back trucks will not be applicable throughout but consideration will be taken of areas which cannot be accessed by such vehicles. In such areas, on days when two waste fractions are collection (plastic/metal or paper/cardboard), a single compartment vehicle will pass by twice, making two collections.</p> <p>Commercial Waste</p> <p>As presented in chapter 6.8 of the WMP, commercial waste will be addressed through a system which incentivises waste prevention and waste separation at source, with fees dependent on volume generated. Whilst the details are not included in the WMP 2021-2030, since by its very nature it is a strategic document which should define direction rather than implementation, more dialogue and</p>
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		<p>the implementation of the strategy will kick off with the use of such vehicles and a specific and agreed plan needs to be put in place of how the changeover and introduction of electric vehicles will gradually take place. The Chamber of SMEs underlines that the Waste Management Plan should also ensure that during the changeover to the Regional Approach, the only focus should be how the change can be achieved through current operators. A system that will facilitate the wiping out of existing operators and their market replacement will not be accepted by the SME Chamber and it would also be a poor choice to make considering all the experience the private operators have gathered along the many years. As such, any procurement process for regional collection of waste must show extensive knowledge of the existing national market, experience in working in it for numerous years and also have already available vehicles to start the works within the immediate (existing not new vehicles).</p> <p>Commercial Waste</p> <p>The Chamber of SMEs underlines that it would like to see and support sensible reforms when it comes to commercial waste collection that takes into consideration the current market depression, which will take long to recuperate, and other limitations.</p> <p>It suggests an incentive driven approach in order to change the mentality and encourage separation at source and achieve positive cooperation. This does not mean that disincentives should not also be present, but disincentives alone will only cater for the negative impact and not the positive attitude this strategy should seek to foster. The reform should be accompanied by a transition period during which an intense education campaign would run.</p> <p>The SME Chamber believes that there is increased appreciation of environmental issues both at commercial and citizen level. It is therefore being suggested that a scheme is created to reward compliance where businesses adhering to an agreed waste regime and positive implementation of the strategy would be certified and benefit from free marketing and exposure as businesses that are committed to</p>	<p>information to interested parties will be provided as the operational model will be fully ironed out.</p> <p>The mechanism identified as described in phase 3: introduce a Pay-as-You-Throw system in the Plan is based on two options. The first is the retention of existing waste collection agreements from commercial outlets with licenced waste carriers, who shall ensure that waste collected is separated. The revised gate fees will incentivise recyclable and organic waste over mixed waste, with the latter being the most expensive. The second option is registering with the local government collection system and making use of standardised waste bags. The fees for the latter will be according to the volume and type of waste to again incentivise waste prevention and waste separation, with black bags being the most costly.</p> <p>Awareness raising campaigns, and specific training to industries will be provided for free to equip the workforce with the required skills.</p> <p>Gate Fees</p> <p>Reflecting further the true cost of waste management is not only another of the Plan’s strategic</p>
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		<p>reduce their waste footprint. The SME Chamber will cooperate in coordinating this initiative.</p> <p>The SME Chamber points out that another point put forward by commercial operators is the responsibility of the waste separation in terms of onus. In some cases due to condominium agreements there might be the creation of situations where the commercial establishments takes care of its waste obligations and then this is mixed by the landlord or condominium operator. Such situations should be discussed and catered for from the outset, the SME Chamber suggests.</p>	<p>objective, but an obligation emanating from the Waste Framework Directive.</p> <p>The WMP states that gate fees shall be revised, after careful consideration of the impacts such would have on the economy, and more importantly such fees would be differentiated with the ultimate scope being incentivising waste separation by all end users.</p> <p>Dialogue with interested parties will be held as a matter of principle.</p>
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15.	GreenPak – 01/02/2021	<p>Recommendation 1: GreenPak recommends that <u>only one PRO should be licensed per waste stream</u>. Should there be competition at PRO level, competing PROs would focus on survival rather than performance. Malta’s poor track record in post-consumer recycling is largely due to this situation.</p> <p>With waste collection responsibility being assigned to the Regional Councils, and funded by multiple PROs, through apportionment of costs, the vital link between the PROs and the waste operator would be broken affecting quality of service. The PRO becomes a mere conveyor of money transfer from the producers to the Regional Councils. The PRO loses any incentive or motivation to improve and innovate. Worst still, despite being legally responsible to producers under the EPR, has no means to influence collection rates and quality, both being requirements in reaching the recycling targets. The PROs will be rendered a hollow shell.</p> <p>As Regional Councils will be blindly funded by PROs, they would have no need to negotiate good deals or any incentive to improve quality, prevent or minimise waste. One PRO per waste stream would restrict the current freedom enjoyed by free riders to under declare, shop around between PROs or not register at all. GreenPak believes in innovation and raising Malta’s profile in the sector. The investment in iBins is technologically innovative in the waste sector as well as internationally on the forefront of Smart Cities. Such innovative projects cannot happen should regionalisation be carried out with multiple PROs. With one PRO, performance will improve as has been the case with batteries. Regionalisation will only work if one PRO is licensed per waste stream.</p> <p>Recommendation 2: GreenPak recommends <u>the EPR requirement of non-packaging paper is placed on the packaging PRO</u>, given the similarity in nature of this material. In certain localities, GreenPak already operates kerbside collections of clean paper and cardboard aimed primarily at small commercial outlets. Should the coop also become responsible for the collection of this waste stream, GreenPak</p>	<p>Recommendation 1: The two main PROs read the provision related to one or more PROs in a diametrically opposite manner. This can only lead to the reinforced notion that Government has not taken a decision in this respect.</p> <p>Recommendation 2: With respect to the proposed measure WMRO_EPR29, it is to be noted that the wording indicates the Government’s intention to establish a new EPR scheme for non-packaging paper. The modalities whereby such an EPR scheme is established are yet to be decided and will be subject to public consultation once a concrete proposal is formulated.</p> <p>There are no objections in principle for the allocation of the obligations for implementing EPR on non-packaging paper and board to the to the PRO/s responsible for packaging. Given the similarity in the nature of this material with packaging, economies of scale may be achieved.</p> <p>Recommendation 3: The capacity of the national regulator on the environment needs to be significantly expanded from both a quantitative and qualitative points of view. This is aptly reflected in the draft</p>
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		<p>is able to extend this service nationwide, if it solely carries the EPR requirement of non-packaging paper. GreenPak believes that its collection systems will do away with single-use plastic bags and still be able to deliver separated clean paper/cardboard to the treatment facility.</p> <p>Recommendation 3: GreenPak endorses the expansion of the EPR model to other sectors and understands first hand how intricate the model is. The demands on ERA will increase, as not only will it be required to oversee more EPR systems but also would need to guide and direct novice PROs that are surely to join the sector. With only two PROs, ERA has at times struggled to fulfil its role as the Competent Authority, since like the PROs themselves this was all a new experience. With the addition of more PROs, <u>ERA needs to be sharper and better equipped to fulfil its increase role.</u></p> <p>The WMP is placing heavy – but essential – responsibility on ERA to ensure all PROs operate in an accountable manner. This means ERA needs to employ specialists competent in understanding the business side of PROs and not just the material flows. To this end, GreenPak is amiable towards sharing with ERA the intricate nature of operating a successful PRO for many years and which has already fulfilled the enw requirements set in the WMP.</p>	<p>plan, notably concerning measure WMRO_EPR9, MC_IC1 and MC_IC4.</p>
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16.	Joseph Sammut, Paul Xuereb – U-Recycle	<ul style="list-style-type: none"> ○ Role of private sector: Not enough importance being directed to the role of private industry for the attainment of the WMP's targets. A clear demarcation is needed between roles and responsibilities of Central Government (through its operating arm, WSM) and private industry in waste management. Certain operations of WSM should be hived off onto private industry where solutions already exist ○ Gate and landfill fees: Current landfill and gate fees need to undergo serious and immediate review. Current fees means it is cheaper and more efficient for industry to dispose of recyclable fractions in a landfill rather than separating it for recycling. One way of ensuring industrial recyclable waste is segregated and recycled is by revising the landfill tax to heavily tax waste going into landfill. ○ Assistance to private sector: High port charges, shipping costs, ERA charges and compliance fees are giving local recycling facilities a disadvantage when competing with foreign competitors. Government should seriously consider assisting local Private Recovery Facilities. ○ Compliance and regulation: Rather than just being a regulatory body, ERA should have an arm to assist facilities in achieving their reporting goals and permit conditions. ERA should ensure a level playing field for all facilities and should heavily penalise illegal waste management facilities. 	<p>Role of private sector: The Plan identifies the promotion of further involvement of the private sector in waste management as one of its strategic objectives. Currently, the waste operations which are Government-owned through WasteServ, include the treatment of residual and organic waste, the sorting of co-mingled recyclables and the temporary storage of bulky and other wastes in its civic amenity sites.</p> <p>Gate and landfill fees: Reflecting further the true cost of waste management is not only another of the Plan's strategic objective, but an obligation emanating from the Waste Framework Directive.</p> <p>The WMP states that gate fees shall be revised, after careful consideration of the impacts such would have on the economy, and more importantly such fees would be differentiated with the ultimate scope being incentivising waste separation by all end users.</p> <p>Dialogue with interested parties will be held as a matter of principle.</p> <p>Assistance, compliance and regulation by ERA: Measures MC_IC1 and MC_IC2 will aim to increase and strengthen both the</p>
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			administrative capacity and technological capacity within ERA.
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17.	Local Councils' Association –	<p>Regionalisation of Waste Collection: The Local Councils' Association favours regionalisation of waste collection by a delegation of authority from Local Councils to Regional Councils to contract for, and administer, waste collections allowing for improvements both in procurement and in day-to-day coordination of collection services. It is against a total legislative devolution of the current responsibilities and authority of Local Councils.</p> <p>Collection System: The Local Councils' Association regrettably notes that this long-term plan does not foresee changes in the current sack-based collection system which renders footpaths inaccessible, dangerous, unpleasant and unhygienic. The system hinders efforts to promote walking as a sustainable mode of mobility.</p> <p>The Association proposes a gradual shift from the current sack-based, door-to-door collection to point collection system through a well-planned and easily accessible network of waste containers groups according to the nation separation strategy sized to the targeted volumes per type of waste. The containers should integrate in the urban environment with refined aesthetics and allowing space for customisation. The containers must be specially designed to house technology elements such as remotely monitored volume, activity sensors and smart locks. Available technology related to access control and volume monitoring provides the administrator and all stakeholders with valuable data to facilitate planning, educational campaigns and better enforcement. These proposed modes of collections present significant space and infrastructural challenges in addition to service and maintenance management. However, we are equally convinced that meeting these ambitious targets could be more accelerated with the active involvement of local councils, residents and community stakeholders.</p>	<p>The WMP identifies an upgrade in the door-to-door collection system, which in itself reduces the collection frequency of mixed waste and includes the notion of central points for mixed and organic waste for commercial establishments. The latter would be the smart waste depots with controlled-access to be seen as an introduction to the concept.</p> <p>Unregulated access goes against the scope of the WMP whereby no restrictions are posed on the waste generator as to how much mixed waste is disposed of. We aim to limit that and instead increase separated fractions.</p> <p>Pilot projects to test the participation levels of residents to the collection point system versus the door-to-door system would provide valuable information.</p>
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FEEDBACK RECEIVED LIVE DURING ONLINE PUBLIC CONSULTATION SESSIONS HELD ON 12/01/2021

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Mary Gaerty – Green Skip Services	<ul style="list-style-type: none"> • How will repair and reuse be integrated into recycling? • What happens to expired food waste? • What happens to the local waste collection workforce when waste collection is regionalised? / • Who is entitled to funds for new/better refuse collection vehicles (RCVs)? • Malta North (MN) – what is the situation of this site? • Currently some bio-degradable material is not being accepted in MN. Will this be accepted in the new site • How will tipping fees be calculated? We need prior notice about these. • Since there will be free organic waste in weekends, should touristic areas keep all their organic waste till the weekend? And where does EPR feature here? • We need more information on new bins and bags • Euro 6 and electric RCVs involve higher purchasing and maintenance costs – this has to be taken into consideration. • Gate fees: what will happen to private operators who have their own facilities. Will we remain in competition with the government. We must be told what the gate fees will be and we cannot remain in competition with the government. Waste collection has to be at commercial rates. Moreover, waste being collected from commercial outlets should fall under EPR. Waste collection from shops or restaurants should be covered by such outlets which produce the waste. 	<p>Repair and reuse: As stipulated in the Waste Framework Directive, recycling is a waste management operation whereas reuse and repair are operations that only pertain to any item which has the status of product. Hence, such operations are not linked to one other. Having said so, it is to noted that the new Union waste <i>acquis</i> emphasises the importance of reuse and repair as key actions to prevent waste from being generated and thus requires that Malta takes effective measures to achieve this objective.</p> <p>Expired food waste: Expired food waste is collected with organic waste and treated in organic processing plants from which clean energy is derived.</p> <p>Current waste collection contractors: Nothing precludes operators to join forces and put forward joint offers in response to the call for proposals.</p> <p>Funds to help purchasing of new RCVs: we are exploring funding opportunities, information further to which will be provided in due course.</p>

			<p>Current situation of Malta North (MN): Malta North is expected to remain functioning even when the new OPP is commissioned.</p> <p>Bio-degradable material: Waste streams to be accepted in the different plants are being identified through a number of ongoing studies</p> <p>Tipping fees: Tipping fees are currently being studied more in depth. There will be due prior notification before tipping fees are introduced.</p> <p>Free organic waste collection: While a free service will be offered on Saturdays and Sundays, commercial establishments are still expected to take their organic/mixed waste out for collection during the week and pay for the service of the waste collector.</p> <p>New bags: new standards for waste bags are being designed. Further information will be provided in due course.</p> <p>Higher cost of Euro 6/electric WCVs: We acknowledge that the new trucks will lead to higher costs. But the direction we</p>
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			<p>are aiming at is modernising the fleet and going for low emission vehicles.</p> <p>Gate fees: Stakeholder consultation on the matter will be undertaken.</p>
2.	George Abdilla – Regjun Tramuntana Executive Councillor	<ul style="list-style-type: none"> • Regional waste collection: How will the system work for food and beverages and commercial waste vis-à-vis regional waste collection? • Commercial outlets: Commercial establishments are already obliged to collect waste, will the WMP be step back? • Can we have more information on the harmonisation of waste collection? • The WMP indicates you want to reach targets for 50% recycling and 50% treatment of organic waste – however this does not seem to be targeting producers and is focused on households. • The Marsa incinerator has only been in use for 13 years – what justification is there for this to be moved away from an industrial area and to Maghtab? • Waste generation of municipal waste is calculated in the WMP is shown at 1,000kg per person – let’s be realistic, this does not make sense. The EU average is 400kg per person. Waste generation will be reduced once we introduce more waste separation. • Will waste treatment involve anaerobic digestion? • Why wait till 2024 to invest in Organic Waste Treatment Plant? Can’t the collection of organic waste start now? 	<p>Regional waste collection: The WMP is proposing that the regions, rather than individual Local Councils, publish waste collection contracts. Such a provision is currently in place in the Local Government Act, which stipulates that waste collection tender shall be published by 2022.</p> <p>Commercial establishments waste collection: The WMP is setting out two methods in terms of how commercial waste can be collected. Small businesses which currently are making use of the Local Council collection system can register with the envisaged regional system and have their commercial waste collected with that of the region. Alternatively, businesses which already have arrangements with a private contractor won't have this system disrupted - they will be able to retain such an arrangement, as long as waste is collected separately. The emphasis is not of who will collect the waste, but on how</p>

			<p>it will be collected - i.e. waste must be separated.</p> <p>More information on harmonisation of waste collection? The chapter on waste collection provides for different schedules of collection which were studied and on careful consideration, Schedule B is noted to provide for increased waste separation from households.</p> <p>Do targets for 50% recycling and 50% treatment of organic waste also target producers, or just households? Targets are set on a national basis transposing those emanating from EU Directives and are applicable to specific waste streams. For example there are targets for municipal solid waste which includes both household and commercial and then there are targets for packaging waste which include plastic, metal, glass, paper and wood, there are targets for batteries, for end-of-life vehicles, for waste electric and electronic equipment and the list goes on. All targets are explained in detail in the Plan.</p> <p>Why is the Marsa incinerator being relocated? This is part of a bigger holistic plan, the ECOHIVE Project. It will complement both the existing and the new plants that will fall within the ECOHIVE Complex. The Marsa</p>
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			<p>plant is ageing and in 5 years' time would be meeting its design expectances. Moreover, since the Marsa plant was built, technology advancements in this sector were substantial. Technological improvements would give Malta a better environmental performance.</p> <p>Figures for waste generation per capita: Scenario S1 presented in the WMP presents a scenario where there is status quo, i.e. Malta will continue to heavily rely on the landfilling of municipal waste; Scenario S2 is based on the investment in new infrastructure such as the WtE. S2 also has its limitations, as although one can observe an improvement in the recycling rate and a decline in the landfilling rate, it does not take into account any behavioural changes of various economic operators, including households. One of the assumptions made by the model is that the <i>waste generation is not affected by any incremental behavioural changes taking place</i>. Thus waste prevention, separation and source and reuse, are not taken into account in both Scenarios. Both scenarios were put forward as part of the waste flow modelling process required for the development of more</p>
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			<p>ambitious waste policy measures, which are then listed in the subsequent chapters of the WMP.</p> <p>Anaerobic digestion treatment: Currently organic waste is already treated by means of anaerobic digestion in the treatment plant at Maghtab and at Sant'Antnin. More capacity will be added in 2024 in the new organic processing plant.</p> <p>Timeframe for Organic Treatment Plant: The OPP will complement the Malta North anaerobic digester, adding capacity. Works on this project already commenced.</p>
3.	David Thake – Nationalist Party MP	<ul style="list-style-type: none"> • A Strategic Environmental Assessment must be carried out before new infrastructure is put in place. • The plan will lead to a reduction in the number of waste collection operators. Bettering equipment is all well and good, but putting out of business several small operators (who have invested in their operations) requires more discussion. • What will tipping fees consist in? • Pay-As-You-Throw: what are the financial burdens for the industry? • Enforcement: whilst wider and more focused waste separation is good, these will be worth nothing if there isn't more enforcement 	<p>SEA: The Strategic Environmental Assessment process for the WMP has already started, as mandated by law, and the Scoping Report in this regard has already been published in the Government Gazette</p> <p>Waste collection operators: The aim of the measures is to have consolidation of services in place of fragmentation. Operators will be free to join together and present a joint offer for their waste collection services.</p>

			<p>Tipping fees: Studies are being undertaken to determine when tipping fees should be introduced and what they should consist of. There will be due prior notification before such tipping fees are introduced.</p> <p>Financial burdens to industry of PAYT: Reflecting further the true cost of waste management is not only another of the Plan's strategic objective, but an obligation emanating from the Waste Framework Directive.</p> <p>The WMP states that gate fees shall be revised, after careful consideration of the impacts such would have on the economy, and more importantly such fees would be differentiated with the ultimate scope being incentivising waste separation by all end users.</p> <p>Dialogue with interested parties will be held as a matter of principle.</p> <p>Enforcement: The WMP is placing significant emphasis on upping the game when it comes to enforcement, and dedicates a section specifically to this.</p>
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4.	Timothy Alden – Malta Chamber	Why will the Organic Processing Plant be built so far into the future and why is there no planning for more organic treatment capacity?	<p>Organic Processing Plant: The OPP will be complementing the anaerobic digester which already exists at Malta North - it will be added capacity to what is already in place. Works on the new OPP already commenced.</p>
5.	Christina Cassar – Moviment Graffiti	<ul style="list-style-type: none"> • 80% of waste generated is construction waste. There are no concrete proposals on recycling construction waste in the WMP – the emphasis should not be on incentives for the construction industry but on [imposing] mandatory requirements. / • Regarding the commercial sector, the separation of waste should be mandatory and enforcement should be high • Waste-To-Energy should be considered as a last solution 	<p>Construction waste: There is not major focus on construction and demolition (C&D) waste in the WMP because when it comes to such waste there is already, in a more advanced stage of development, another strategy which specifically deals with such waste. A strategy on C&D waste has already been issued for public consultation and the policy is now in an advanced stage and should be issued in its final form in the next months.</p> <p>Mandatory separation of waste: One of the principles of the WMP is for waste separation to be mandatory for every individual, entity and organisation, be it a home or a commercial outlet.</p> <p>Waste-To-Energy plant: The WMP emphasises that recyclable material, particularly that which is already separated at source, will not go to the Waste-To-Energy plant - it will go to the MRF which is one of the new infrastructures which will be built. The</p>

			WtE will only deal with non-recyclable materials.
6.	Wilson Mifsud – WM Environmental	<ul style="list-style-type: none"> • Day and night waste collections: how will this take place and how are such waste collection vehicles to be utilized both in the morning and night, when the morning collection ends late afternoon? • Split-back trucks: split-back trucks cannot be used in all localities or in all roads, because such vehicles are wider than single-partition trucks. • Cost of new waste collection vehicles: the WMP is pushing for more modern waste collection vehicles – which is good - and for 10% of waste collection vehicles to be electric. However, it does not follow that this will lead to a reduction in costs, since electric and Euro 6 vehicles are substantially more expensive than other (Euro 4 and 5) vehicles, and maintenance costs are also excessively high. And what will happen to companies which have invested in older trucks? 	<p>Twice-daily collections: The aim of twice-daily (day and night) collections is to maximise the utilisation of waste collection vehicles and to require for contractors a higher level of logistical ability that when necessary a different crew operates the vehicle for different rounds. This is similar to the public transport model where vehicles operate for long periods of time. The WMP does not mention specific collection times, except that there should be two shifts. This matter will be further clarified in the terms of reference of the regional tenders.</p> <p>Use of split-back trucks: Accessibility issues for split-back trucks in some localities/areas are acknowledged. In light of this, the move towards split-back trucks will not be applicable throughout but consideration will be taken of areas which cannot be accessed by such vehicles. In such areas, on days when two waste fractions are collection (plastic/metal or paper/cardboard), a</p>

			<p>single compartment vehicle will pass by twice, making two collections.</p> <p>Waste collection vehicle costs: The WMP's financial analyses enters into different cost scenarios according to different systems which were studied. The WMP does not claim costs will be reduced, but that at the same cost or with a slightly increased cost, the waste collection service offered can be changed to one which utilises a modern fleet. The step towards having 10% of the fleet being electric emanates from an obligation in the EU's Clean Vehicles Directive, which specifies that waste collection tenders are 10% for electric vehicles.</p>
7.	Ryan Portelli (private citizen)	Separation of organic and recyclable waste: what action will be taken to ensure that households and commercial outlets follow this requirement?	Mandatory separation: The WMP will introduce mandatory waste separation.
8.	Christopher Abela Mizzi – MCCA	Construction and demolition waste: C&D waste is one of the biggest sources of waste. The WMP proposes a minimum of 15% recycled materials used in buildings – but this must be done in accordance with EU regulations. We must ensure not to in any way incentivize the use of non-compliant construction products. /	Construction waste: A specific strategy on construction and demolition waste has been published for public consultation.

9.	Vanya Veras – VIVACITY CEO / Municipal Waste Europe secretary general	<p>The WMP includes a top of the range separate collection system, including not only the existing separate collection of organic waste from households, but also adding the separate organic waste from commercial outlets. As per the experience of many European countries and cities documented and followed by zero-waste Europe, in a country in Malta’s geographic location, demographics and culture, 50% of MCW is organic waste. Therefore, the question is: why, with this top of the range separate collection system, is Malta aiming so low when it comes to recycling levels.</p>	<p>Organic waste targets: A large portion of Municipal Solid Waste consists in organic waste. In light of this, the aim behind the ECOHIVE complex, part of which is the Organic Processing Plant, is to improve the managing of organic waste in such a way as to allow it to be recycled and used in Malta’s fields.</p> <p>The main objective of the WMP is to implement policy measures to prevent waste, increase source separation of waste to increase recycling and hence reduce drastically reliance on landfilling so that Malta complies with its waste targets.</p>
10.	Joe Attard – Green MT / WEEE Malta	<ul style="list-style-type: none"> • Implementation of the 2014-2020 WMP: While it has been stated in the new WMP that 80% of the older plan was implemented, we are still at the bottom of the EU when it comes to recycling and collection results. Can you explain this? • EPR: EPR refers to “extended”, not “exclusive” producer responsibility. Importers or producers have to finance all planned waste streams, and taking into consideration that the WMP says it will do all it can to incentivise the private sector, the initiatives in which the private sector can be involved will be limited by operations which will be handled by the government. There is nothing in the WMP on the implementation of clearing house through which sector operators can manage themselves. EPR works in an equitable way if all the stakeholders involved in EPR are represented in terms of decisions. • Regionalisation – is this still on the cards that this comes in place on 1 January 2022, or is this still open for discussion? 	<p>WMP 2014-2020: An exercise was undertaken to determine which measures were implemented and which were not. A number of measures are still ongoing and were integrated into the new WMP.</p> <p>EPR: The proposed measures under the EPR section in the WMP are drafted in such a way to be fully in line with the concept of Extended Producer Responsibility as stipulated in the amended Waste Framework Directive and related lex specialis pieces of Union and national legislation, namely that producers of products are solely responsible of the products they place on the national market. The new measures on EPR, in fact, need to be</p>

			<p>read and construed with the new Legal Notices transposing the amended Union waste package.</p> <p>Regionalisation: As stated in the WMP and specified in the Local Government Act, the intention is to have regionalised waste collection tenders published in 2022.</p>
11.	Laurie Zammit – KIP Gozo	<ul style="list-style-type: none"> • Split-back trucks present a big problem, especially for Gozo, since they fit in practically none of the villages. Gozo should be considered on its own, because it faces particular problems. One of the issues is transporting waste to Malta. • The WMP will sound the death knell for existing waste collection contractors. It will make it hard to compete when Euro 6 and electric vehicles are required. More meetings with waste collectors are needed. 	<p>Waste collection vehicles’ accessibility: Accessibility issues for split-back trucks in some localities/areas are acknowledged. In light of this, the move towards split-back trucks will not be applicable throughout but consideration will be taken of areas which cannot be accessed by such vehicles. In such areas, on days when two waste fractions are collection (plastic/metal or paper/cardboard), a single compartment vehicle will pass by twice, making two collections.</p> <p>Waste collectors: the WMP aims to see an improvement in service and the modernisation of all services. It will strive to lead to the consolidation of services offered and the elimination of fragmentation.</p>

12.	Mario Fava – Local Councils’ Association	<p>Inaccessible sidewalks: If the WMP covers a 9/10-year period, we must look beyond today. By 2030, we can’t remain the only country in Europe where sidewalks are rendered inaccessible due to waste bags. Sidewalks are there for people to be able to use. Moreover, system to reduce the number of waste collection trucks on streets is needed.</p>	<p>The WMP identifies an upgrade in the door-to-door collection system, which in itself reduces the collection frequency of mixed waste and includes the notion of central points for mixed and organic waste for commercial establishments. The latter would be the smart waste depots with controlled-access to be seen as an introduction to the concept. Unregulated access goes against the scope of the WMP whereby no restrictions are posed on the waste generator as to how much mixed waste is disposed of.</p>
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