



Public Consultation Submissions & Responses

Intent and Objectives: Update to Malta's Noise Action Plan

July 2019

Environment & Resources Authority



CONSULTATION FEEDBACK

| Ref No. | Name of Stakeholder / Date | Comments Received | Response / Remarks |
|---------|-------------------------------|--|--|
| 1 | Rio Sammut 18/06/2019 | It is unacceptable to have to suffer weeks on end of hammering into the rocks for digging garage spaces beneath new buildings. The constant loud hammering and earth tremors are a cause of frustration and depression for elderly and sick people, shift workers, pregnant mothers, handicapped persons and other vulnerable folk.; not to mention pets. All rock cutting in residential areas should be done by electric machines, which are much less noisy, safer and cause no unearthly tremors. | This comment is noted however construction noise is outside the scope of the Environmental Noise Directive. |
| 2 | Patrick Calleja 19/06/2019 | The shooting range at San Blas Valley in Nadur Gozo is a terrible nuisance as far as noise is concerned. This is supposed to be a protected valley and part of the Natura 2000 natural heritage area. The valley once enjoyed a tranquil setting. The shooting range has been a horrific nuisance to all residents of the area with shooting going on all day even on weekends! The whole thing makes a mockery of the little natural heritage we have left. | Noise from shooting ranges is beyond the scope of the Noise Action Plan under the reporting obligations of the Environmental Noise Directive and is considered more of a nuisance rather than noise pollution. |
| 3 | Frank Vella 23/06/2019 | Kemm nigded l attenzjoni ta min hu ikkocernat dwar muzika qawwija li qed tinstghema fl inhawi tal mosta tard bil lejl igifieri anke fis 2 and 3am. Ta min wiehed jindirizza din il problema speċjalment minhabba dawk li jridu jqumu ghax xoghol filghodu | Dan l-ilmont ma jaqax fl-ambitu tan- <i>Noise Action Plan</i> , u qiegħed jiġi ndirizzat permezz tal-mezzi xierqa. |

| | | | |
|---|--|--|--|
| 4 | A Darmanin 23/06/2019 | Dear Sir, just wondering whether something could be included to include the noise emanating from the compressors of Air conditioners especially the ones installed in shafts or yards and whether this could include those already installed especially those fixed under the windows of main bedrooms. | This comment is noted. However, noise emission by outdoor equipment is outside the scope of the Environmental Noise Directive. |
| 5 | Jimmy Fenech 23/06/2019 | Go Ta' Qali qed isir daqq ta' muzika veru storbuza fil-weekend li jinstemgha mill-Mosta sas-sieghat bikrin ta' filghodu (sat-3.30am) ta'nhar il-Hadd kienu ghadhom ghaddejjin, anqas tieqa ma stajna nifthu. Dan vera mhux sew, jekk iridu jdoqqu muzika gholja jaghmluha fil-maghluq u bis-sound proof mhux idejjqu il-mistrieħ ta'haddieħor. Nispera li tittieħed azzjoni. Grazie. | Dan l-ilment ma jaqax fl-ambitu tan- <i>Noise Action Plan</i> , u qieghed jigi ndirizzat permezz tal-mezzi xierqa. |
| 6 | Karen Mifsud 24/06/2019 | I live in Hope street and last night was impossible to sleep, kept hearing loud music till the early hours couldn't sleep at all. The only suggestions I can think of is doing these types of parties indoors with ac and sound proof or doing a silent disco where people are given wireless headphones and they can dance till whatever time they want. the silent disco is common abroad . the last suggestion could be starting a petition for mosta residents to sign about the noise pollution which is making it impossible for mosta residents to get a good night's sleep. | Comment is noted however the matter does not fall within the scope of the Noise Action Plan, and is being addressed through the appropriate channels. |
| 7 | Gertrude Buttigieg Malta Health Network 26/06/2019 | The Malta Health Network (MHN) is an umbrella organisation representing over 40 health related organisations, counting over 20,000 families. MHN welcomes actions to address the management of environmental noise issues especially in view of the harmful effects on human health. Special consideration should be given to vulnerable populations including patients and elderly persons in health care and residential facilities and also in their own residences. We hope that industrial noise is meant to include noise arising from construction as this is a major issue in Malta which needs to be addressed urgently and | Comments have been noted. Through the implementation of the Noise Action Plan, noise reduction and prevention measures will be considered for potential locations with high noise levels inducing harmful effect on human health. Priority shall be allocated to hot spot areas which include noise sensitive receptors such as schools, hospitals as well as old people's homes and children's parks. |

| | | | |
|---|---|--|---|
| | | <p>comprehensively. We would also recommend to also urgently address 'noise as nuisance' since, despite not being considered as 'pollution' in your write up, it is important for quality of life and well being. The World Health Organization 2018 Environmental Noise Guidelines for the European Region recommends a precautionary approach to prevent exposure above the guideline values for average noise and single-event and impulse noise exposures.'</p> <p>It is important that whatever measures are taken to ensure reduction in noise pollution, these are supported with doable and adequate enforcement regulations.</p> | <p>The industrial noise sources do not cover construction noise but as defined in article 4 of the Assessment and Management of Environment Noise Regulations (S.L. 549.37) are limited to sites of industrial activity such as those defined in Annex I of the Integrated Pollution Prevention and Control Regulations (S.L. 549.77).</p> <p>Regarding noise as nuisance from both construction and neighbourhood noise, it is to be noted that this falls outside the scope of the Environmental Noise Directive.</p> |
| 8 | <p>Gordon Vassallo</p> <p>Mount St Joseph Retreat House</p> <p>01/07/2019</p> | <p>We were pleased to note that ERA, in collaboration with MESDC, is preparing an updated Noise Action Plan (NAP) under the Environmental Noise Directive.</p> <p>First and foremost we strongly support all the objectives as set out by NAP in view of the long-term plan aiming to prevent and reduce environmental noise.</p> <p>We are aware through various published reports that noisy areas extend considerably throughout most of the Maltese Islands as compared to some 50 per cent in most other EU Member States. We are also aware of the significant adverse health effects of those exposed to noise levels, often exceeding the EU noise levels thresholds.</p> <p>Amongst the adverse health effects as published by WHO (Guidelines for Community Noise) are:</p> <p><i>Noise-induced hearing impairment; Interference with communication; Sleep disturbance effects; Cardiovascular and psychophysiological effects; Mental health effects;</i></p> | <p>Comments have been noted. The WHO has recently published an update to the Community Noise Guidelines. Please refer to the WHO Environmental Noise Guidelines for the European Region [http://www.euro.who.int/en/health-topics/environment-and-health/noise/environmental-noise-guidelines-for-the-european-region].</p> |

| | | | |
|--|--|---|---|
| | | <p><i>Effects on performance; Annoyance responses and Effects on social behaviour.</i></p> <p>Within the above context, we hereby submit our feedback and comments on the intent and objectives of this programme with particular reference to the “preservation of relatively quiet areas in the agglomeration and in open countryside through the identification and delineation of such areas.”</p> <p>Although we are extremely sensitive and support all initiatives to reduce ‘noise pollution’ over all the Maltese Islands it is understandable that our comments are strongly focused and limited on the preservation of Mount St Joseph Retreat House, being a rare and unique place of restful silence in the open countryside. Our aim is to safeguard Mount St Joseph Retreat House (hereinafter referred to as ‘the House’) and ensure it is included in NAP’s long- term plan which aims to “prevent and reduce environmental noise’ which can seriously harm this unique House. Incidentally, the House has been designated by MEPA as a Grade 2 Scheduled Property in view of it being the most outstanding example of mid-20th century.</p> <p>We hereby give you a brief overview of the House to be able to appreciate our concern for its preservation in view of its’ extensive service to the Maltese nation as a House contributing to the development of the whole human person, not only on the spiritual level, but also including the psychological, emotional and physical wellbeing. Naturally, maintaining the House as a ‘place for restful silence, unencumbered by surrounding noise which pose a serious threat to the ambient of the House, is highly conducive in achieving its aims..... to give some rest to people living in our noisy world.</p> | <p>The specific concern with regards to noise preservation at Mount St Joseph has been noted and is certainly considered as a noise sensitive receptor. However, kindly note that preservation of quiet areas in the agglomeration are generally applicable to recreational open areas used by the general public.</p> <p>Nevertheless, through the implementation of the Noise Action Plan, noise reduction and prevention measures will be considered for potential locations with high noise levels inducing harmful effect on human health. Therefore, priority shall be given to hot spot areas which include noise sensitive receptors such as schools, hospitals as well as old people’s homes and children’s parks.</p> |
|--|--|---|---|

| | | | |
|---|--------------------------------------|--|---|
| | | <p>Mount St Joseph is situated on the outskirts of Mosta, with over 6,000 annual visitors. For the past 50 years it has served as a haven for meditation, contemplation, guidance and counselling and a place of rest.</p> <p>Mount St Joseph can accommodate up to 78 people in twin-bedded rooms, and its facilities include three conference rooms, chapels and prayer rooms. The property is surrounded by countryside. Its grounds include spacious gardens replete with walkways and benches in its efforts to provide an ideal place for reflection and/or meditation.</p> <p>Mount St Joseph is a “place of restful silence for those seeking to pause the fast pace of modern life and enter to a haven of peace and quiet”</p> <p>It is precisely because of the nature of the House and its’ well-being purposes among so many Maltese which raises serious concern over any future neighbourhood development.</p> <p>It would be an immense loss for Malta and the Maltese if Mount St Joseph would not be preserved and included in NAP’s long-term plan which aims to “prevent and reduce environmental noise” , which noise will, undoubtedly seriously harm this unique House.</p> | |
| 9 | <p>Maria Axiaq</p> <p>03/07/2019</p> | <p>I think that the new policy should consider the loud noise produced by entertainment venues such as wedding venues, pool parties and of course party venues. Several urban areas are effected by loud music on a regular basis. Such venues function till 4.00am to the detriment of residents who cannot keep a window open. Loud music gets louder as time progresses, and this could be caused by the fact that as party goers start leaving the venue, the sound tends to spread over a wider area.</p> | <p>This comment is noted however entertainment noise is outside the scope of the Environmental Noise Directive.</p> |

| | | | |
|----|--|---|---|
| | | <p>Therefore, besides lowering the legal level, it should also be stipulated that sound level should be at lower levels at later times and organizers should provide soundproofing for the venues.</p> <p>Living near such venues causes sleepless nights and therefore a very stressful life.</p> <p>Organizers of such events should consider residents of nearby villages and it is not fair on the general public to suffer so that they earn money.</p> <p>It is also in the public interest to safeguard the health of citizen and tourists visiting the island.</p> | |
| 10 | <p>Jeanette Carabott</p> <p>07/07/2019</p> | <p>Please find below my proposals concerning the above open consultation vis-à-vis discos held such as Gianpula (limits of Rabat), Numero Uno (limits of ta' Qali) and various discos held around Malta, as well as bars and roof parties). The below proposals should be considered when drafting legislation.</p> <p>Proposals for the short-immediate term</p> <ul style="list-style-type: none"> • Inspectorate should add a limiter on the amplifier (such as for example a range of decibels). Thus if the sound exceed the decibels threshold, the limiter would cease the amplifier and the music would stop. • Introduce a timing difference in the sense that, for example, after 12:00 am the different decibels would apply. • Re-alignment of speakers • Use of modern acoustic wall panels – These would be highly useful in bars located at urban areas. • Penalties apply according to business ownership and their turnover. Example - Large discotheques are to pay a hefty fine, whilst small bars are to pay less. • Random spot checks to be carried out by police force to ensure compliance with requirements. | <p>Comments have been noted. Entertainment noise is outside the scope of the Environmental Noise Directive.</p> |

| | | | |
|--|--|---|--|
| | | <ul style="list-style-type: none"> • Sound controls would benefit both for locals who wish to sleep and rest at night as well as to party people who are not exposed to such high volumes. <p>Proposals for the Long Term</p> <ul style="list-style-type: none"> • Conifer trees should be planted one next to each other, in the perimeter of the Disco against the prevailing wind (Most common wind North West in Malta) to reduce noise. In addition to that, trees have various aesthetic advantages, improve air quality, gives shade and attracts fauna. • Creating awareness and education on the consequences of noise pollution. The creation of awareness on noise pollution and its effects on both humans and wildlife can generate positive outcomes on efforts to reduce noise pollution. Perhaps if most people could be aware that noise pollution can lead to hearing loss and mental stress, then majority will invest in ways to reduce noise pollution. | |
|--|--|---|--|

LATE COMMENTS

| | | | |
|---|--|---|---|
| 1 | <p>Marie-Therese Camenzuli</p> <p>Kummissjoni Interdjoċesana Ambjent</p> <p>15/07/2019</p> | <p>In December 2015 the KA had published a set of proposals inspired by the Encyclical <i>Laudato Si`</i> of Pope Francis on the Care of Our Common Home. The KA had invited Government, the Planning Authority and the Environment and Resources Authority to ensure that the environment is safeguarded for the enjoyment of the public in search of peace and quiet.</p> | <p>Comments have been noted. Entertainment noise is outside the scope of the Environmental Noise Directive (END).</p> <p>Nevertheless, it should be clarified that the delineation of such quiet areas under the END will only be designated in areas where there is no or limited noise from noise sources, in particular road</p> |
|---|--|---|---|

| | | | |
|--|--|--|--|
| | | <p>The KA appealed for the publication and implementation of proper noise pollution regulations. The open countryside and the seaside are a main source of relaxation for people. It is a fact that, in certain areas of the country, the peace and quiet of the environment is impaired by the long uninterrupted noise that breaks the evening and night silence especially by music from hotels and open-air discos, among other sources, whether on or close to beaches or inland.</p> <p>The KA had noted that it is especially egocentric for some operators of hospitality and entertainment establishments to allow music to be heard over a wide-ranging area that goes far beyond the precincts of their premises.</p> <p>The KA holds that the peaceful enjoyment of the countryside and the seaside is an asset for everybody. People who cannot afford a holiday abroad and cannot therefore enjoy the peace and quiet offered by large swathes of land should not be deprived of the enjoyment of a peaceful and quiet environment in Malta because of the narrow considerations of some.</p> <p>The KA therefore recommends that:</p> <ul style="list-style-type: none"> • ERA invites people to inform it of the places that are causing noise nuisance on a regular basis; • ERA carries out a study of the noise emitted from such places to determine whether such noise falls within the scope of the Environmental Noise Directive (END); and • if such noises do not fall within the scope of END, then ERA needs to draw up an action plan to deal with such noises that on a daily or weekend basis are consistently negatively affecting many people. | <p>traffic in the agglomeration or open country, as per the requirements under the Directive.</p> <p>On the comment related to enforcement, It is to be clarified that S.L. 549.37 deals with assessment and management of specific noise sources, namely road traffic, aviation and industry over a continuous exposure time (annual averages). Therefore, neighbourhood noise, noise nuisance, entertainment and construction noise do not fall within scope of S.L. 549.37.</p> |
|--|--|--|--|

| | | | |
|--|--|--|--|
| | | The KA invites ERA to include in the updated Noise Action Plan the number of enforcement actions and the cases they addressed under the Assessment and Management of Environment Noise Regulations (S.L. 549.37). In this way it would be easier to evaluate the effectiveness or otherwise of the current Plan. | |
|--|--|--|--|