

Comments on the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA)

Application No:PA/04863/22

ERA ref:EA/00042/20

Proposal:The proposed construction of a Material Recovery Facility (MRF) for the processing of grey bag and recovery of different streams of materials. The proposal includes ancillary office space, staff quarters and parking spaces.

Location:Site at, Ecohive Complex, Tul il-Kosta / Triq ir-Ramla, Triq ta' Saverja, Naxxar

1. ERA comments

A. Comments on the Coordinated Assessment Report

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply	Reply																												
1.	2.3.1	30	This section refers to a 2019 waste characterisation survey. Kindly annex said characterisation study to the EIA Report. ERA is aware of a more recent survey undertaken by WSM, as well as the studies carried out by ERA is 2022 and 2023 on the green/grey bag and the black bag respectively, results of which were shared with WSM. The report should also assess whether the more recent surveys would affect the chosen capacity (i.e. 70,000 tonnes). Page 42 specifies that the waste feedstock shall be source separated grey/green bags. Using latest available NSO data, the green/grey bag generation of 41kg per capita in 2023 would need to increase to 115kg by 2030 to reach the capacity of 70,000 tonnes, taking into consideration the predicted population increase of 33,500 indicated in page 30. Kindly clarify further the expected increase separately collected recyclable waste by 2030.	WSM is aware and has in hand the most recent characterisation studies carried out by ERA. Whilst there are some differences between results produced in table 3 of attached report versus results from ERA studies (see figure below), it is clear that the overall material specific difference is negligible thus the configuration and capacity of the said plant would not be affected. <table><tr><th></th><th>Environment & Design Results</th><th>ERA Annual Average Study</th><th>Difference</th></tr><tr><td>Plastics</td><td>24.54%</td><td>26.37%</td><td>-1.83%</td></tr><tr><td>Cardboard & Paper</td><td>49.05%</td><td>47.47%</td><td>1.58%</td></tr><tr><td>Metals</td><td>5.24%</td><td>5.99%</td><td>-0.75%</td></tr><tr><td>Glass</td><td>1.68%</td><td>1.91%</td><td>-0.23%</td></tr><tr><td>Rejects</td><td>18.41%</td><td>17.25%</td><td>1.16%</td></tr><tr><td>WEEE</td><td>0.27%</td><td>0.84%</td><td>-0.57%</td></tr></table> In addition, the feedstock of the plant will not only be grey/green bags but also BI Sites and C&I recyclable waste thus the capacity of 70,000 tonnes is identified as required in order for the country to attain the recycling performance required.		Environment & Design Results	ERA Annual Average Study	Difference	Plastics	24.54%	26.37%	-1.83%	Cardboard & Paper	49.05%	47.47%	1.58%	Metals	5.24%	5.99%	-0.75%	Glass	1.68%	1.91%	-0.23%	Rejects	18.41%	17.25%	1.16%	WEEE	0.27%	0.84%	-0.57%	The inclusion of reference to waste from bring in sites and civic amenity sites as waste feedstock for the MRF is noted. The coordinated assessment should also refer to C&I recyclable waste if these are also considered as the input feedstock. The reply refers to a report which has not been attached. This is to be provided for ERA to further understand the capacity and additional feedstock from the BI Sites, Civic Amenity sites, and the C&I recyclable waste.	WSM reconfirms that the feedstock of the plant will not only be grey/green bags but also BI Sites and C&I recyclable waste. With regards to the said report, this has been submitted.	-	-
	Environment & Design Results	ERA Annual Average Study	Difference																																	
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2.	2.3.1	30	The Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40) sets reduction targets on Member States, such that packaging waste is to be reduced by 5% in 2030, 10% in 2035, and 15% in 2040 per capita over the reference year of 2018. Kindly clarify whether this has been taken into consideration when calculating the capacity?	No, the characterisation exercise and sizing of the facility was carried out in 2020 prior to the entering into force of the new EU Packaging and Packaging Waste Regulation (PPWR), officially adopted as Regulation (EU) 2025/40 in 2025.	No further comments.	-	-	-																												
3.	2.4.1	35	This section states that ‘<i>The waste feedstock at the MRF shall be source separated in grey/green bags collected by Refuse Collection Vehicles (RCVs) from households and local business around the Maltese Islands.</i>’ Noting the capacity of 70,000 tonnes, will waste from bring in sites and civic amenity sites also be considered as feedstock in other to reach such a capacity?	Yes, confirmed.	Addition noted. No further comments.	-	-	-																												
4.	Table 3	26	It is understood from section 2.4.1 (page 36) that ferrous and non-ferrous metals will also be treated at the MRF, hence metals are to also be included in Table 3. With regards to the plastics that can be treated at the MRF, would WSM be able to report the output according to Table 3 of Annex XII the Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40)? <table><tr><td>Plastic</td><td>PET rigid</td></tr><tr><td></td><td>PE rigid, PP rigid, HDPE and PP rigid</td></tr><tr><td></td><td>Films/flexible</td></tr><tr><td></td><td>PS, XPS, EPS</td></tr><tr><td></td><td>Other rigid plastics</td></tr><tr><td></td><td>Biodegradable (rigid and flexible)</td></tr></table>	Plastic	PET rigid		PE rigid, PP rigid, HDPE and PP rigid		Films/flexible		PS, XPS, EPS		Other rigid plastics		Biodegradable (rigid and flexible)	Table 3 has been updated. Yes, WSM would be able to report the output according to said Table 3.	Amendent and replies noted. No further comments.	-	-	-																
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5.	2.4.2.5	39	Reference is made to: ‘<i>It is expected that a considerable area outside the MRF site will be necessary to provide sufficient space for these activities, however, the specifics could only be determined once the EPC Contractor is chosen.</i>’ Although the specifics can only be determined by the EPC Contractor, emphasis is to be made that any areas outside of the MRF site, should be disturbed ground and are to be restored or rehabilitated to a better state once works are completed. The	Noted and included.	Noted. No further comments.	-	-	-																												

			use of areas within the confines of the ECOHIVE Complex is highly encouraged.					
6.			Reference is made to ' <i>The structure hosting the new MRF will be developed over around 27,200m² with..</i> ' Section 2.2.1 states that 'The footprint of the entire site earmarked for development is around 21,373m ² , whereby the MRF building shall occupy 11,900m ² ...whilst the remaining 5,500m ² shall be used for manoeuvring and access of vehicles.' Kindly clarify discrepancy.	Noted and revised to 11,900m2 to refer to the building footprint only.	Noted. No further comments.	-	-	-
7.	2.4.4	46	With regards to ' <i>The area may be utilised by Wasteserv Malta for other waste management operations as deemed fit at that time of decommissioning.</i> ', any future use of the site shall be subject to any necessary assessment required at the time.	Noted	Coordinator statement is to be updated.	Revised	No further comments.	-
8.	Figure 16	48	A clarification is required on the access to the MRF site using external roads. Figure 16, indicates in red, access through Triq ir-Ramla and a dirt road branching from Triq ir-Ramla. A clarification and justification is required as to why access is not envisaged from the 'ECOHIVE Complex Zwejra Entrance', through tarmac roads.	WSM confirms that access to MRF will be through the existing tarmac road from Zwejra Entrance. Kindly refer to the revised plan.	Noted. No further comments.	-	-	-
9.	2.4.8.2	52	This section states that ' <i>Any excess inert material can be backfilled in quarries permitted to accept such waste given that leachate results also reveal full compliance with the EU limits stipulated in 2003/33/EC.</i> ' In line with ERA's previous comment on the related Method Statement, if backfilling in quarry void spaces will be explored as an option for the excavated material, it needs to be demonstrated that such material is uncontaminated by comparing with the residential limits of the Italian Decreto 152 of 3rd April 2006.	Noted, the comparison with the residential limits of the Decreto has also been undertaken. The material characterisation report and the CA have been updated accordingly.	Amendments noted. No further comments.	-	-	-
10.	3.1	54	It should be noted that the siting of the MRF within the ECOHIVE complex was determined through the Waste Management Plan. Reference is to be made to this document.	Noted and added.	Noted. No further comments.	-	-	-
11.	4.1 Table 8 Table 12	64 66 67	The sea cover and uses was scoped out.	Revised.	Noted. No further comments.	-	-	-
12.	4.1.2.1	70	Reference is made to: ' <i>The Complex can be accessed from two entrances</i> '. Kindly identify the two entrances as only one entrance is being describes.	Revised.	Noted. No further comments.	-	-	-
13.	/	/	/	/	Reference is made to 'Ta' Hammud vegetation report II (AGL Design Landscape Architects, 2018)'. Said report is to be annexed to the Coordinated Assessment.	This will be included in Appendix 3 in the PDF version	Noted.	-
14.	4.2.2	78	Reference is also to be made to the Thermal Treatment Facility.	Added.	Noted. No further comments.	-	-	-
15.	4	/	Include the Impact assessment criteria (Section 4.2, 4.3, 4.4, 4.6, 4.7 and 4.8).	Included.	Noted. No further comments.	-	-	-
16.	Figure 46	102	List the ' <i>Areas of Ecological Importance (A-G) around the site are marked with a green outline (PA Geoserver)</i> ' referenced to in the caption.	This comment is unclear. These sites are listed in the text before the quote figure.	Include a legend and describe each area, as only a description for Site A has been provided.	Some additional detail regarding the protection status assigned to each area is now included in the text.	Noted.	-
17.	/	/	Reference is made to ' <i>Terrestrial Ecology Baseline Study and Impact Assessment (Doublet & Zammit, 2022)</i> '. It should be noted that ERA had requested and issued Terms of Reference for a terrestrial ecology baseline study and not an impact assessment. Said study is to be annexed to the Coordinated Assessment.	Revised and included.	Reference is to be amended throughout the document.	Revised	Noted.	-
18.	4.5.2.1	108	Reference is made to ' <i>A number of invasive species have naturally colonized the spaces in between the native trees.</i> ' Efforts are to be made to remove and replace any invasive species. This should be carried out in line with ' <i>Guidelines on managing non-native plant invaders and restoring native plant communities in terrestrial settings in the Maltese Islands</i> '.	The comment is noted by WSM.	No further comments.	-	-	-
19.	Table 25	118	Include quantities for each species.	This table includes various vegetative species which are encountered in great numbers across the site. Counting each individual is beyond the scope of the broad-brush survey. Instead, the EIA reports provide quantities of the protected trees present in the Aol in the subsequent table.	Original comment still stands. The Coordinated assessment should clearly indicate the number and types of trees present on site. In this regard, Table 25 is to be updated to include all species present on site, together with their quantities.	Indicative quantities of vegetative species are now included. Quantities of trees are now also included in this table.	Noted. No further comments.	-
20.	4.6.1	121	Reference is made to the list of Natura 2000 sites (i.e MT0000008, MT0000007, MT0000022 and MT0000112). Natura 2000 site - SAC MT0000022 (Il Gżejjer ta' San Pawl Selmunett) was excluded from the study at Method Statement	In the Avifauna TS, CA and AA reports references to SAC MT0000105 have been included where relevant. References to the SACs MT0000022 and MT0000002 have been removed as requested by ERA.	Noted.	-	-	-

			stage in view that these are considerable far away from the proposed site. ERA had requested the inclusion of MT 0000105 (Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u il-Qaliet). In this regard, assessment is to be carried out for the following Natura 2000 sites: • SAC MT00000007 – Is-Salini. • SAC MT00000008 – L-Ghadira s-Safra u l-Iskoll tal-Għallis. • SAC MT0000105 (Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u il-Qaliet, • SPA MT0000112 (Żona fil-Baħar ta' Madwar Għawdex). In view of the above, kindly amend the Avifauna technical study together with the respective sections in the Coordinated Assessment.					
21.	4.0 5.0	/	Include a section on the marine environment, as relevant. This should assess any potential impacts from the construction and operational phases of the facility, including any potential run off, assessing also impact on the above mentioned SACs.	The avifauna impact assessment already considered a number of marine environmental impacts. Further detail has been included in the terrestrial ecology impact assessment to consider the effects of rainwater runoff to sea.	No further comments.	-	-	-
22.	4.9	/	This is to be revised in line with the comments provided below in the Noise Technical study section.	Noted and revised accordingly.	No further comments.	-	-	-
23.	5.0	/	The impact significance (not significant/ minor/ moderate/major) are to be included and should reflect the impact significance in the tables in section 6.	Noted and revised accordingly.	Noted. See related pending comments below.	Amended	Noted.	-
24.	5.1.2	152	Reference is made to section 5.1.2 Operational phase – were assessment is being carried out on the hydrological features. Section 6.1 makes reference to increased pollution onto surrounding agricultural land and extreme events (such as oil leaks/spills, accidents, flooding, fires, site failure etc) onto existing roads, adjacent trees plantations and agricultural land. Kindly correlate these 2 sections accordingly.	Section has been revised accordingly.	Noted.	-	-	-
25.	5.2.1	/	Include impact significance. This should be in line with the summary of impacts table.	Impact significance was already included in Section for 5.2.1 for all impacts mentioned in the text. Alignment with the summary of impacts table also actioned.	Amendments in Table 6.2 noted. No further comments.	-	-	-
26.	5.2.1	153	Reference is made to <i>'The visibility of construction activities... interfere with the skyline. This is particularly true for VP3 and VP4... any intersecting machinery or equipment.'</i> Said impact in Section 5.2.1 is being assessed as major adverse, whereas in section 6.2 'Reduced visual amenity during construction works at VP1, VP3, VP4 & VP7 is assessed as moderate. Kindly revise the impact significance and residual impact, as necessary.	The summary of impacts table has been revised.	Noted. No further comments.	-	-	-
27.	5.2.1	154	With regards to VP 2, 5 and 6, the same impact as above is assessed as moderate adverse in Section 5.2.1, and major adverse in Section 6.2. Kindly revise the impact significance and residual impact, as necessary.	As above.	Noted. No further comments.	-	-	-
28.	5.3.1	164	This section is to be revised and should include a description of the impacts and their significance as summarised in Section 6.3 (Table 56).	Section 5.3.1 has been revised to include further information about the impact significance.	Ensure that all impacts identified in Section 5.3.1 are listed in Table 6.3. Include all impact significance in Section 5.3.1.	Revised Section 5.3.1 and Table 6.3 accordingly	Noted. Kindly ensure that all mitigation measures listed are feasible.	Revised ERA reply No further comments.
29.	5.3.1	164	Provide a summary of the conclusion of the Material Characterisation report in the Coordinated Assessment.	Added to Sections 5.3.1 and 5.4.1	Noted. Include any related impact significance. Include also in Table 6.3.	Revised	Noted.	-
30.	5.3.2	164	Include a description of the impacts and their significance as summarised in Section 6.3 (Table 56).	Section 5.3.2 has been revised to include further information about the impact significance.	Section 5.3.2 deals with operational impacts, however includes impacts related to the removal of strata from the site which are considered as part of the construction phase.	Impacts related to removal of strata and soil from the site have been removed.	Noted.	-
31.	5.4.1	/	Include impact significance. This should be in line with the summary of impacts table.	Added.	Noted. Included impact significance related to the material characterisation.	Revised	-	-
32.	5.4.2	/	Include impact significance. This should be in line with the summary of impacts table.	Added.	Noted. No further comments.	-	-	-
33.	5.5.1	/	Include impact significance. This should be in line with the summary of impacts table.	Added.	Noted. No further comments.	-	-	-
34.	5.5.1	166	Include all species present on site that shall be intervened upon, together with their quantities. List should not be limited to protected species.	This table includes various vegetative species which are encountered in great numbers across the site. Counting each individual is beyond the scope of the broad-brush survey. Instead, the EIA reports provide quantities of the protected trees present in the Aol in the subsequent table.	Original comment is being reiterated.	Revised table.	Amendment to Table 26 are being noted.	-

35.	5.5.1	166	The landscaping scheme is to be amended and intensified further and should include references to compensatory planting.	The area available for the project is restricted to avoid taking further agricultural land for the plant requirements. Mature trees may be transplanted, or when this is not feasible due to site conditions, relocated to the perimeter of the site, which will feature a landscaping scheme of circa 2,690 sqm. Compensation for removed trees will follow guidelines from the Environment and Resources Authority (ERA).	Noted. No further comments at this stage.	-	-	-
36.	5.5.2	/	Include impact significance. This should be in line with the summary of impacts table.	Added	Noted. No further comments.	-	-	-
37.	5.5.2	167	It is unclear how the increase in vehicular traffic will affect the terrestrial ecology.	This is already explained in the second paragraph of Section 5.5.2. Further detail has been added in the first paragraph to clarify.	Noted.	-	-	-
38.	5.6.1	/	Include impact significance. This should be in line with the summary of impacts table.	A sentence has been added, including the impact significance in line with the impact table in the Avifauna TS and AA reports.	Noted.	-	-	-
39.	5.6.1	167	Reference is made to ' <i>The proposed development will result in a temporary (localised and short-term) loss of potential breeding habitat.</i> ' and ' <i>The construction phase will cause temporary habitat loss and disturbance, potentially affecting foraging...</i> ' - ERA is not in agreement that the loss of habitats/ destruction of (disused) agricultural land ODZ is assessed as temporary. The presence of machinery and associated construction related activities are considered temporary, not the actual loss of habitat/agricultural land <i>per se</i>. Kindly amend as necessary, in this section and section 6.6. - The mitigation measure proposed in Section 6.6 (i.e. 'keep time short, keep footprint low, avoid (if possible) reproductive season, habitat restoration) for said impact is not considered comparable to the related impact. The proposed mitigation measure is more likely to be effective vis-à-vis the presence of machinery and associated construction related activities (as outlined above). Kindly amend as necessary, in this section and section 6.6.	Noted and amended.	Amendments noted. 'Keep footprint low' is also not considered as a mitigation measure if this is not possible, when noting the alternative siting, technologies and layouts considered in the Coordinated assessment.	There is no mention of mitigation measures in Section 5.6.1. Mitigation measure in Section 6.6, "keep footprint low" has been reworded for further clarity.	Revision noted. This is also to be amended in Table 6.1 'minimise construction site size'.	-
40.	5.6.1	/	Include impacts related to noise and vibration.	Added	Noted.	-	-	-
41.	5.6.2	/	Include impact significance. This should be in line with the summary of impacts table.	Added	Noted. Impact significant related to ALAN in the text is assessed a moderate while in Table 6.6 is assessed as major. Kindly amend and distinguish between the impact significance related to nocturnal migrating birds and seabirds. The text states that there are 'no mitigation measures in place' regarding ALAN. On the other hand, mitigation measures are listed in Table 6.6. Kindly amend accordingly.	The operational impact significance of ALAN in the text is described as major adverse, and this coincides with Table 6.6. The impact related to nocturnal migrating birds is a construction impact and is classified as a moderate adverse impact. The 2 nd comment is referring to Section 5.6.1. The text states that there could be negative consequences IF works are carried out at night with no mitigation measures. Therefore, Table 6.6 provides appropriate mitigation measures.	Noted.	-
42.	5.6.2	/	Include impacts related to noise and vibration.	Added	Noted.	-	-	-
43.	5.6.2	/	/	/	Reference is made to the 'moderate beneficial impact' when compared to the current situation of open landfill. In Table 6.6 the impact is listed as both adverse and beneficial. Kindly amend.	The text is referring to a reduction in GHG emissions as a moderate beneficial impact when compared to the current open landfill. This is identical to what is stated in Table 6.6 Regarding the risk of plastics being spilled into the surroundings, the text refers to this impact as moderate adverse. The table refers to it is a moderate adverse impact, but clarifies that it is beneficial when compared to open landfill situation. This part is added to the text now. The impact has been revised to a beneficial one.	No further comments.	-

44.	5.6.2	/	Risks associated with fires as described in Section 5.6.2 are to be include in Section 6.6	Added	Inclusion of impact significance in section 5.6.2 is noted. Include in Table 6.6.	Added	-	-
45.	5.7.1	170	This section is to be revised and should include a description of the impacts and their significance as summarised in Section 6.7 (Table 60).	Added	Noted.	-	-	-
46.	5.7.2	170	This section is to be revised and should include a description of the impacts and their significance as summarised in Section 6.7 (Table 60).	Added	Noted.	-	-	-
47.	5.8	171	This section is to be revised and should include a description of the impacts and their significance as summarised in Section 6.8 (Table 61).	Added	Reference is made to dry-stone huts and related impact. Kindly include these in Table 6.8.	Added in Table 6.8.	Noted.	-
48.	5.8.1	171	Reference to ' <i>Taž-Žebbugija</i> ' Megaliths is only mentioned in this section of the document. Further information is to be provided in Section 4.8. Information in Section 4.8 should not be limited to the site itself but also to the Area of Influence.	Added further detail in Section 4.8.2	Impact significance for ' <i>Taž-Žebbugija</i> ' in Section 5.8.1 is assessed as 'no direct impact' while in Section 6.8 impact is assessed as minor. Kindly amend. Reference to Ta' Hammud is to be included in Section 5.	Revised Section 6.8 accordingly. Ta' Hammud has been added to Section 5.8.1.	Noted.	-
49.	5.8.2	/	/	/	Section 5.8.2 refers to ' <i>Taž-Žebbugija</i> ' while Section 6.8 refers only to <i>Ta' Hammud</i> . Kindly amend accordingly.	Ta' Hammud is included in Section 5.8.2. Taz-Zebbugija is included in Section 6.8, impact table.	Noted.	-
50.	5.9	/	This is to be revised in line with the comments provided below in the Noise Technical study section.	Revised as necessary.	Noted.	-	-	-
51.	5.9	/	This section is to be revised and should include a description of the impacts and their significance as summarised in Section 6.9 (Table 62).	Revised.	Original comment stands. Impact significance levels are to tally.	The impact significance levels tally with the ones shown in the impacts table.	In section 5.9.1 impacts related to construction are assessed as minor, while in Table 6.9 impacts are assessed as minor and not significant.	Revised ERA reply No further comments.
52.	5.11	/	Include impacts related to climate change and climate change adaptation in the summary of impacts table.	Added	Include impact significance in Section 5.11 as per Table 6.11.	Section 5.11 has been revised to reflect the impacts in Table 6.11.	Noted.	-
53.	5.12 Table 47	178	Reference should also be made to fire hazard risk and contamination of the Mean Sea Level Aquifer.	These risks were already included in the Table. These risks are now also mentioned in the text in Section 5.12.	Inclusion in Section 5.12 noted.	-	-	-
54.	5	General	Include a section on the overall cumulative impacts.	Added in Section 5.14.	Noted.	-	Ensure that the cumulative impacts take into consideration the approved and proposed projects (as outlined in the Waste Management Plan)	Revised ERA reply No further comments.
55.	5.14.1	/	/	/	Reference is made to the mitigation measures listed. These are: - Related more to the impacts resulting from dust rather than the change in land use; and - Do not correlate to the measures listed in Table 6.12.	Mitigation measures removed from this section.	Noted.	-
56.	5.14.2	/	/	/	Summary is to be provided.	Reference to Section 5.2.2 is now included.	Original comments still stand. A summary of the impact is to be provided.	Added ERA reply No further comments.
57.	6	General	Include a summary of impacts table related to cumulative impacts.	Added in Section 6.12	Noted.	-	Ensure that the cumulative impacts take into consideration the approved and proposed projects (as outlined in the	Revised ERA reply No further comments.

								Waste Management Plan)	
58.	6.9	/	This is to be revised in line with the comments provided below in the Noise Technical study section.	No changes were necessary	Noted.	-	-	-	
59.	7.0	/	This is to be revised in line with the comments provided below in the Noise Technical study section.	No changes were necessary	Noted.	-	-	-	
60.	7.1	General	Ensure that the mitigation measures listed in this section are listed in the summary of impacts table.	Noted and included.	Ensure that all mitigation measures listed are implementable. The proposed mitigation 'keep footprint low' is not considered as a mitigation measure if this is not possible, when taking into account the alternative siting, technologies and layouts considered in the coordinated assessment. This is to be amended throughout the document.	Noted and revised	Mitigation measures listed in the summary of impacts tables are to be included in this section.	Added ERA reply No further comments.	
61.	7.2	General / all sub-sections	Include the residual impact significance.	Added	Include section on Archaeology and cultural heritage.	Added	Include the residual impact significance.	Revised ERA reply No further comments.	
62.	7.2.3 7.2.4	203	Section 7.2.4 related to Water bodies seems to replicate several impacts related to geology and geomorphology, which are already outline in section 7.2.3. Kindly amend accordingly.	Revised.	Noted.	-	-	-	

B. Comments on the Non-Technical Summary (comments apply for both the English and Maltese version)

Ref No	Section	Page	ERA comment	Reply	ERA reply
1.	2.3	9	It should be noted that the siting of the MRF within the ECOHIVE complex was determined through the Waste Management Plan. Reference is to be made to this document.	Included.	Noted.
2.	/	/	The NTS is to be revised as per comments provided in the Coordinated Assessment Report (particularly, but not limited to sections 4.0, 7.0, 10.0).	Revised as necessary.	Noted.
3.	/	/	Include a section on the overall cumulative impacts.	Added.	Noted.

C. Comments on the Technical Study – Archaeology and Cultural Heritage Technical Study

Ref No	Section	Page	ERA comment	Reply	ERA reply
1.	8.0	51	Reference is made to the ' <i>overall impact significance</i> ' in Table 8.0 where impact significance is described as ' <i>moderate to major</i> '. On the other hand, Table 6.8 of the Coordinated Assessment, the same impacts are assessed as major. Kindly clarify said discrepancy.	Revised.	Noted.

D. Comments on the Technical Study – Site Clearance and Land Contamination Investigations

Ref No	Section	Page	ERA comment	Reply	ERA reply
1.	3.1	16	While the tables currently indicate that the limit for the parameters C10 – C40 is 'N/A', the limit for C>12 should be applied. In this regard, there would be exceedances in the residential limit in a number of the samples, hence material excavated from areas represented by such samples would not be suitable for backfilling in a quarry excavation void. Excavated material (from site) can be used as backfill on site, in view that the industrial limits have not been exceeded. Should there still be an excess of excavated material exceeding the residential limits, end-of-waste recovery options could be explored, as well as use as landfill daily cover.	Noted and revised.	Amendments noted. No further comments.
2.	3.3	27	Further to the above, if backfilling in quarry void spaces will be explored as an option for the excavated material, it needs to be demonstrated that such material is uncontaminated (by comparing with the residential limits of the Italian Decreto 152 of 3rd April 2006). In view that this is one of the options considered, table 5 should also compare the results to such limits to confirm that the excavated material can be backfilled in a quarry excavation void.	Noted, the comparison with the residential limits of the Decreto has also been undertaken. The material characterisation report and the CA have been updated accordingly.	Amendments noted. No further comments.

E. Comments on the Technical Study – Noise technical study

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply
1.	/	/	The construction noise was scoped out.	A full construction noise and vibration assessment was not required due the distance away from the receptors, and construction noise impact at the receptors would be masked by existing operational noise as well as road traffic noise. Although only a qualitative assessment of construction noise was requested by the ERA, a high-level construction noise assessment has still been undertaken as a precaution.	Noted. No further comments.	-
2.	6.1 and where applicable	25	Kindly amend the NSR03 description, as revised for the Noise Thermal Treatment Facility (TTF) Study, by including the phrase "representative of NSR04", and amend the NSR04	Detail has been added in the appropriate sections and tables to clarify which monitoring locations are	Noted. Kindly amend par 4. under table 25 to read 4dB instead of 3dB in view of the following statement:	Revised

			description, as revised for the Noise TTF Study, by including the phrase "representative of NSR03". This should be applied throughout the entire report, as was done for the Noise TTF Study_V3, to clarify that NSR03 and NSR04 were shifted during the baseline monitoring locations.	representative of each NSR.	"At NSR01 during the night-time Table 25 indicates that the cumulative rating level is + 4dB above".	ERA reply No further comments.
3.	7.2.4	35	Appendix B. Provide the Operational Daytime Noise Model Output, to show the resulted noise level at NSR2 to 4 as well as the Operational Night time Noise model output.	Now included.	Noted. No further comments.	-
4.	7.2.5	35	Kindly provide the total predicted specific noise level at the site used for predictions at the NSRs.	Site specific sound levels used in the prediction of specific levels are now included.	Noted. No further comments.	-
5.	7.2.6	38	Table 18. Amend the LA90 and difference values for NSR03 to align with the baseline measurement results, where NSR03 corresponds to NSR04 i.e., 54 instead of 56 for LAeq, and -24 for the difference.	Noted and amended.	Noted. No further comments.	-
6.	7.2.6	38	Table 19. Kindly correct to be in line with previous comment, -24 instead of -2 for daytime NSR03	Noted and amended.	Noted. No further comments.	-
7.	9.2	45/46	Table 24. The IC2 development should not be added as part of the cumulative operational noise assessment considering that no noise impact is envisaged from this development during the operational phase. Furthermore, the noise study for IC2 assessed only the construction noise impact. Kindly revise total cumulative values as part of this amendment.	The IC2 development has been removed from the cumulative operational noise assessment.	Noted. No further comments.	-
8.	9.2.1	45/46	Table 25. Kindly add a rating level of (+3) to the night-time specific sound levels, in order to align with the outcomes of the qualitative studies for the OPP and WtE facilities. Although no rating penalties were concluded for the TTF and MRF during night-time, it is considered likely that these rating levels will be present on site once all facilities become operational. In this regard, results are to be revised, using the corrected figures for the cumulative levels (deducting IC2) and including the night-time rating penalties. As a result of these amendments, the conclusion would need to be updated accordingly, including revision to the bullets in page 39.	In accordance with BS 4142:2014+A1:2019, the cumulative specific sound level associated with the proposed developments has been calculated at 40 dB. This is 7 dB below the measured night-time residual sound level of 47 dB at NSR01. Given this significant margin, the specific sound is not expected to be readily distinguishable from the residual acoustic environment. In this case, the cumulative sound level is sufficiently masked by the residual sound, and no distinctive acoustic features are anticipated. Therefore, a character correction of +3 dB is not applicable. With regard to the WtE, a +3dB correction was applied to the night-time specific levels, to account for the stack as potentially distinctive against residual sound levels. However, this correction was applied as a precautionary measure; interrogation of the noise model indicates a specific level of only 25 dB from the stack, which is 22 dB below the residual night-time level at NSR01 and very unlikely to be audible. Therefore +3 dB has not been applied to the cumulative specific level for the night-time.	The justification provided would only fully apply if the assessment followed the BS 4142 methodology as intended, where the specific sound level is derived from actual monitoring and calculated by subtracting the residual from the ambient level. In this case, however, the specific sound was not measured since the facilities are not yet operational. Instead, it was based on literature and modelling assumptions. When all plants become operational and cumulative noise levels are assessed, the evaluation must include any applicable rating corrections for all facilities and be compared against the background sound level, as required by BS 4142. This is essential for determining the true impact on sensitive receptors. However, given that the +3 dB adjustment for the WtE was included as a precautionary measure to assess the worst-case impact from the stack, it is acknowledged that, since the noise level from the stack is 22 dB below the residual night time level at NSR01, it is unlikely that the background level will be exceeded due to the character correction. No further comments at this stage. Any further possible mitigation measures will remain subject to the outcome of the noise monitoring study under the IPPC permit once all sites are fully operational.	Noted ERA reply No further comments.
9.	9.2.1	47	Bullet 1. In view of the above night-time revision, consultant may need to justify further the worst case scenario and where applicable provide mitigation measures for NSR01 during night time.	In view of the above, further mitigation measures are not considered to be necessary.	Noted as above.	-

F. Comments on the Technical Study – Avifauna technical study

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply
1.	/	/	Reference is made to the title page – ‘ <i>Appropriate Assessment and Environmental Impact Assessment for EA/00042/20 regarding avifauna</i> ’ This should read ‘Avifauna technical study’.	This has been amended	Noted.	-	-
2.	1.0 2.1	4 5	Reference is made to the list of Natura 2000 sites (i.e MT0000008, MT0000007, MT0000022 and MT0000112) in section 1.0, and the list of Natura 2000 sites in Section 2.1 (i.e. i.e MT0000002, MT0000007, MT0000008, MT0000022 and MT0000112) Natura 2000 site - SAC MT0000002 (L-inħawi ta’ Pembroke) and SAC MT0000022 (Il Gzejjer ta’ San Pawl Selmunett)’ were exculeded in view that these are considerable far away from the proposed site. ERA had requested the inclusion of MT0000105 (Żona fil-baħar bejn il-ponta ta’ San Dimitri (Għawdex) u il-Qaliet). In this regard, assessment is to be carried out for the following Natura 2000 sites: • SAC MT0000007 – Is-Salini. • SAC MT0000008 – L-Ghadira s-Safra u l-Iskoll tal-Għallis. • SAC MT0000105 (Żona fil-Baħar bejn il-Ponta ta’ San Dimitri (Għawdex) u il-Qaliet, • SPA MT0000112 (Żona fil-Baħar ta’ Madwar Għawdex). In view of the above, kindly amend the Avifauna technical study together with the respective sections in the Coordinated Assessment Report and Appropriate Assessment Report.	In the Avifauna TS and AA reports references to SAC MT0000105 have been included where relevant. References to the SACs MT0000022 and MT0000002 have been removed as requested by ERA.	Noted.	-	-

3.	3.1.2 3.2.2	31 32	The assessment of light pollution on avifauna should not be limited to Aol-2, especially in the context of the EIA.	Noted and amended.	This has not been addressed. Section 3.1 Construction phase refers to the following: - Noise and vibration within Aol- 1 - Light pollution within Aol-2 Section 3.2 Operational phase refers to the following: - Habitat loss, noise and vibrations within Aol-1 - Light pollution within Aol-2. In this regard, original comment still stand.	Revised. The light pollution assessment encapsulates all areas, not just Aol-2.	Noted. ERA reply No further comments.

G. Comments on the Technical Study – Ecology technical study

Ref No	Section	Page	ERA comment	Reply	ERA reply
1.			Include a section on the marine environment, as relevant. This should assess any potential impacts from the construction and operational phases of the facility, including any potential run off.	Added	Noted.

H. Comments on the Appropriate Assessment

Ref No	Section	Page	ERA comment	Reply	ERA reply	Reply	ERA reply	Reply
1.	/	/	Kindly note repetitive number of tables within the document and amend accordingly including any in-text references.	Revised.	Noted.	-		-
2.	/	/	The scope of the AA is to assess the impacts of species and natural habitats within a Natura 2000 site. In view that the site is not within a Natura 2000 site, said inclusion is not deemed relevant. In this regard, the AA should be revised to assess solely impacts on species, natural habitats within, and the integrity of the Natura 2000 sites.	Noted and revised.	Amendments noted, however further revisions are necessary.	Revised.		-
3.	/	/	The assessment should also include the marine ecology for which the Natura 2000 site below are designated for.	Added.	Noted.	-	-	-
4.	3.2.2	13	Reference is made to the list of Natura 2000 sites (i.e MT0000008, MT0000007, MT0000022 and MT0000112). Natura 2000 site – SAC MT0000022 (Il Gzejjer ta' San Pawl Selmunett)' was excluded in view that it is considerable far away from the proposed site. ERA had requested the inclusion of MT 0000105 (Żona fil-baħar bejn il-ponta ta' San Dimitri (Għawdex) u il-Qaliet). In this regard, assessment is to be carried out for the following Natura 2000 sites: • SAC MT0000007 - Is-Salini. • SAC MT0000008 - L-Għadira s-Safra u l-Iskoll tal-Għallis. • SAC MT0000105 - Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u Il-Qaliet, • SPA MT0000112 - Żona fil-Baħar ta' Madwar Għawdex. In view of the above, kindly amend accordingly the AA together with the respective sections in the Avifauna technical study.	Revised.	Noted.	-	-	-
5.	4.1.1 4.1.2 4.1.3	/	The information provided in these sections are not considered suitable in the AA in view that the main scope was not to assess Natura 2000 sites, their habitats, species or its integrity.	Removed.	Noted.	-	-	-
6.	Figure 13	31	Figure is to be updated to illustrate also 'l-Iskolla tal-Għallis'.	Updated	Noted.	-	-	-
7.	4.2	32	The list of Natura 2000 sites is to be updated as per comment 4 above. Natura 2000 site – SAC MT0000002 (Pembroke) and SAC MT0000022 (Il Gzejjer ta' San Pawl Selmunett)' were excluded in view that it is considerable far away from the proposed site. ERA had requested the inclusion of MT 0000105 (Żona fil-baħar bejn il-ponta ta' San Dimitri (Għawdex) u il-Qaliet).	In the Avifauna TS, CA and AA reports references to SAC MT0000105 have been included where relevant. References to the SACs MT0000022 and MT0000002 have been removed as requested by ERA.	Noted.	-	-	-
8.	4.2.1	32	Reference to breeding landbirds within the Aol-1 should not be assessed in the AA in view that these species are not the species for which the relevant Natura 2000 site was designated.	Removed.	Noted. This is to be reflected in Section 5.1.2.	All references to AOI-1 have been removed from Section 5.1.2.	Noted.	-
9.	4.2.2	/	Reference is made to 'Mediterranean Storm-petrel <i>Hydrobates pelagicus melitensis</i> ' and 'Yellow-legged Gull <i>Larus michahellis</i> ' In view that these species is not a trigger species for the Natura 2000 site identified above, it is recommended that said inclusion is omitted.	We would argue in favour of retaining the two species. Despite not being listed as trigger species, both can hold significant numbers in the relevant areas, L. michahellis has been reported breeding in the Aol-2 and H. pelagicus is listed on Annex I of the birds directive and is sensitive to threats such as ALAN.	Noted.	-	-	-
10.	4.2.3	/	The information provided in these sections are not considered suitable in the AA in view that the main scope was not to assess Natura 2000 sites, their habitats, species or its integrity.	While the relevant Natura 2000 sites are mentioned, the main scope in these sections lies on the Aols. We therefore argue in favour of retaining the information in these sections.	Noted.	-	-	-
11.	5.1.1	54	The assessment of the construction phase on the terrestrial environment is to focus on how the proposed works will affect/impact habitats and species located within, and the integrity of the designated terrestrial Natura 2000 sites.	Additional detail has been included.	Original comment still stands. Section is to be revised to solely refer to aspects related to the Natura 2000 site.	Revised.	Noted.	-
12.	5.1.2	57	The assessment of the construction phase on avifauna is to focus on how the proposed works will affect/impact habitats and species located within, and the integrity of the designated Natura 2000 sites.	Two sentences focusing on this specifically have been added.	Noted.	-	-	-
13.	5.2.1	58	The assessment of the operational phase on the terrestrial environment is to be limited to how the proposed works will affect/impact habitats and species located within, and the integrity of the designated terrestrial Natura 2000 sites.	Additional detail has been included.	Noted.	-	-	-
14.	5.2	/	Include a section on the impacts on avifauna during the operational phase.	Noted and included	Noted.	-	-	-
15.	5.4 Table 4	690	The summary of impacts table is to be revised to include solely the impacts on the species, natural habitats and the integrity of the Natura 2000 site as a whole.	Revised.	Noted.	-	-	-
16.	6.1.1	62	Reference is made to Table 1 in the avifauna section. Kindly amend tables numbering as per comment 1 above.	Noted	Noted.	-	-	-
17.	6.1.1	62	This section is to be revised and proposed mitigation measure for potential impacts that are assessed in Section 5.1.2 (following amendments as per comment 12 above), and should only take into account those species for which the Natura 2000 sites cite above are designated for. Ensure that mitigation measures listed in the summary of impacts table are cross-referenced.	Added and revised.	This is to be revised further and should include mitigation measures related to impacts affecting species, habitats and the integrity of Natura 2000 sites.	Some mitigation measures which are not applicable have been removed.	Section 6.1.1 - last bullet is referring to operational impacts while the section is on construction related impacts.	Amended ERA reply No further comments.

18	6.1.2	64	This section should be limited to impacts on Natura 2000 sites, their designated habitats and species.	Revised	This is to be revised further and should include mitigation measures related to impacts affecting species, habitats and the integrity of Natura 2000 sites.	Some mitigation measures which are not applicable have been removed.	Noted.	-
19	6.1.3	66	Reference is made ' <i>To reduce the residual impact</i> '. Kindly clarify whether the proposed mitigation measures are to mitigate the 'overall' or 'residual' impact significance.	Revised	Noted.	-	-	-
20	6.1.3	66	The ' <i>recommendations</i> ' listed in this section, can be considered as mitigations measures. Kindly amend accordingly.	Revised	Noted.	-	-	-
21	6.1.3	66	It is considered that the 'recommendations' listed in this section can apply also to avian species for which the Natura 2000 sites were designated for, not just 'local terrestrial breeding bird populations'.	Noted and amended.	Noted.	-	-	-
22	6.2	66	This section is to be revised and proposed mitigation measure for potential impacts that are assessed in section 5.2.1 (following amendments as per comment 13 above vis-à-vis terrestrial ecology and comment 14 vis a vis avifauna), and should only take into account those species for which the Natura 2000 sites sited above are designated for.	Revised and amended.	Noted.	-	-	-
23	6.2	66	Include reference to potential noise related impacts and mitigation measures during operation.	Noise disturbance had been mentioned already. This has been amended further.	Noted.	-	-	-
24	7.0	69	The AA should assess the cumulative impacts from the developments within the Aols including the identification of the overall cumulative residual impact significance.	Cumulative impacts from the developments have been assessed further in Section 7.12.	- The section on cumulative impacts needs to distinguish between overall impacts and residual impacts, after the implementation of mitigation measure. - Quantification of the terms 'positive/negative cumulative effects' whether these are significant or not. - A conclusion on the overall residual cumulative impacts.	The cumulative impacts section has been moved to a new section under Heading 5.4. The impacts are classified as significant and non-significant.	Comment still stands. Section 7.1.2 does not tackle impacts from ALAN.	Section 5.4 and Section 7.1.2 have been revised accordingly. ERA reply No further comments.
25	7.1.1	69	Kindly clarify the following: ' <i>Despite the comprehensive adoption of the recommended mitigation measures, a number of unavoidable residual impacts are still expected to arise, namely...</i> ' in view that the ' <i>residual impact significance</i> '. In the summary of impact table, such are assessed as 'not significant' or 'none', with the exception of 'Loss of terrestrial ecosystems in Aol' which goes beyond the scope of the AA, and is to be revised as per comment 15 above.	Wording changed to 'insignificant' in Section 7.1.1.	Noted.	-	-	-
26	7.2	69	Compensatory measures are to be included only in case when the residual impact significance following the implementation of mitigation measures is significant. In this regard, a clarification is required whether compensatory measures are required.	Refer to Section 7.2	Reference is made to the title. Kindly amend accordingly. Furthermore, since the tree species are not part of a Natura 2000 site, Section 7.2 should not refer to compensatory planting.	Section 7.2 has been removed.	Noted.	-
27							Section 7.2 - reference to the engagement of a tree specialist goes beyond the scope of the AA.	Removed ERA reply No further comments.
28	9.0	73	The conclusion is to be revised in light of the above comments, mainly but not limited to: • Omission of terrestrial environment not within a Natura 2000 site • Inclusion also reference to Special Areas of Conservation • Inclusion of Site Specific Conservation Objectives • Conclusion whether the proposal is envisaged to affect the species, natural habitats and the integrity of the Natura 2000 sites as a whole.	Revised and further detail has been provided.	Conclusion should focus specifically on the species and habitats for which the Natura 2000 site was designated together with its integrity.	Revised	-	-