

The Executive Chairperson
Planning Authority
St. Francis Ravelin
Floriana

Date: 10 August 2026
ERA Ref: EA 00042/20

Dear Sir/Madam,

Planning Ref.: PA/04863/22

Description 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

Reference is made to the Environmental Impact Assessment (EIA) and Appropriate Assessment Reports submitted as part of the proposal in caption. Attached to this correspondence please find:

- Annex I: Summary of the EIA and AA Reports; and
- Annex II: ERA Conditions.

1. Introduction and Case Background

PA/04863/22 is a full development application for a Material Recovery Facility (MRF) within the ECOHIVE Complex for the processing of grey bag and recovery of different waste streams of materials.

Proposal has been assessed by ERA through the Environmental Impact Assessment (EIA) process. Such EIA was requested following screening in accordance with the EIA Regulations (S.L. 549.46), specifically the following criteria in Schedule I, Category II:

- Section 1.0.2.1 (*Development with a site area of 2ha or more*); and
- Section 13.0.2.1 (*Any change to, or extension of, projects (even if the project is already authorised, executed or in the process of being executed), particularly projects covered by Category I or Category II, where the change or extension itself does not fall under Category I but may have significant adverse effects on the environment*).

The proposal was also assessed by ERA through an Appropriate Assessment (AA) following screening in accordance with the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44) in view of its location within the following Natura 2000 sites:

- MT0000007- Is-Salini designated as a terrestrial Special Area of Conservation via Government Notice 1379 of 2016;

- MT0000008 - L-Għadira s-Safra u l-Iskoll tal-Għallis designated as a terrestrial Special Area of Conservation via Government Notice 1522 of 2019, in accordance with the Flora, Fauna and Natural Habitats Protection Regulations (S.L.549.44);
- MT0000105 - Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u Il Qaliet designated as a marine Special Area of Conservation of International Importance via Government Notice 682 of 2018;
- MT0000107 - Żona fil-Baħar fil-Grigal, designated as a Special Area of Conservation via Government Notice No. 1311 of 2016; and
- MT0000112 - Żona fil-Baħar ta' Madwar Għawdex designated as a marine Special Protected Area via Government Notice 1311 of 2016.

A concise summary of the EIA and AA process, its ancillary process and the salient findings is annexed.

The consultants' EIA and AA reports along with all the relevant documentation can be accessed from the ERA website, through the following link: <https://era.org.mt/era-project/pa-04863-22/>.

2. Overview and main findings of the EIA Report

The EIA Coordinated Assessment has identified various moderate and major residual adverse impacts on agricultural land, change in land use and loss of geological material, terrestrial ecology, landscape character and visual amenity, archaeology. Several residual beneficial impacts were also identified including the diversion of material from landfill, reducing of GHG emissions, and increase in Malta's waste recovery capacity.

Land use, geology, agriculture and terrestrial ecology

- The change of land use is *major adverse*;
- The loss of rock strata is *moderate adverse*;
- The loss of agricultural land, resulting in decrease in overall ODZ land resulting from the excavation of the site and construction of the facility is of *moderate to major adverse significance*; and
- Loss of terrestrial habitats and species (circa 244 tree individuals) is *moderate adverse*.

Landscape character and visual amenity

- Deterioration of the landscape value during construction from Viewpoints 1 to 7 due to the presence of construction and excavation machinery, cranes, dust, noise, vibration and associated works on the landscape elements is *moderate adverse*;
- Deterioration of the landscape value during operation from Viewpoints 1 to 7 due to the presence of the MRF Building and take up of agricultural land on the landscape elements is *major (slight reduction)*;
- Reduction of the visual amenity of potential visual receptors from Viewpoints 1, 3, 4 and 7 due to the presence of construction and excavation machinery, cranes, dust, noise, vibration and associated works is *moderate adverse*; and

- Reduced visual amenity due to the presence of MRF Building and take up of agricultural land on potential visual receptors is assessed as follows:
 - o Viewpoints 3 and 6: moderate adverse impact; and
 - o Viewpoint 4, 5 and 7: *major adverse impact*.

Archaeology and cultural heritage

- Loss of features and change in the context and cultural landscape resulting from excavation and demolition/ dismantling of rural structures and dry-stone huts is *moderate adverse*;
- Potential damage to cultural and/or archaeological features below the ground during excavation works is assessed as *moderate adverse*; and
- During operation, the deterioration of the cultural landscape value on Taż-Żebbuġija and Ta' Ħammud archaeological sites due to the presence of the MRF building is *major adverse*.

Beneficial impacts

- Reduction in greenhouse gases from open landfill is *moderate beneficial*; and
- Increase Malta's waste recovery capacity is *major beneficial*.

Cumulative impacts

The following are the impacts from the simultaneous construction and operation of the waste management facilities listed in the Waste Management Plan within the ECOHIVE complex, including the Waste-to-Energy, Organic Processing Plant, Materials Recovery Facility and Thermal Treatment Facility:

- Change of land use and loss of natural land including flora (trees), fauna and habitats is *major adverse*;
- Fragmentation and loss of agricultural land are *moderate adverse*;
- Loss of features and change in the context and cultural landscape resulting from excavation and demolition/ dismantling of rural structures is *moderate adverse*;
- Deterioration of the landscape value during construction from Viewpoints 1 to 7 due to the presence of construction and excavation machinery, cranes, dust, noise, vibration and associated works on the landscape elements is *moderate adverse*;
- Reduction of the visual amenity of potential visual receptors due to the presence of construction and excavation machinery, cranes, dust, noise, vibration and associated works is assessed as *minor to moderate adverse*;
- Deterioration of the landscape value and reduction of visual amenity during operation from Viewpoints 1 to 7 due to the presence of the MRF Building and take up of agricultural land on the landscape elements is *major (slight reduction) adverse*;
- Flooding of the water catchment resulting from paving of agricultural areas is *moderate adverse*; and
- Expanded capacity for recycling and reduction of landfilling practices is *moderate beneficial*.

3. Overview and main findings of the AA Report

The AA report concluded that no significant impacts are expected on the terrestrial SACs due to their distance from the site. Potentially significant impacts on the nearby marine SPA, particularly from

construction and operational noise, vibration and artificial light affecting seabirds, as well as risks associated with fire incidents, will not be significant following mitigation. The project is also expected to provide a beneficial contribution to climate change mitigation through improved waste management and reduced greenhouse gas emissions.

Residual impacts on habitats, protected species, and ecological processes are insignificant. Consequently, the integrity of the Natura 2000 sites is not expected to be adversely affected, and the conservation status of protected species will remain unchanged. The proposed mitigation measures are consistent with the sites' conservation objectives, ensuring that habitat protection and species conservation targets remain fully achievable.

4. ERA's Assessment and Recommendations

The proposal would result in various significant adverse residual impacts on land use, geology, agriculture and terrestrial ecology, landscape character and visual amenity, and archaeology and cultural heritage. With respect to the latter, the ERA has the following conclusions and recommendations:

- a) Regarding land take-up and impacts on terrestrial ecology, it is acknowledged that the proposed development would result in moderate to major significant adverse effects. However, given the strategic need to consolidate waste management facilities within the ECOHIVE Complex, similar impacts would arise under all alternative site configurations considered and are therefore unavoidable. Where feasible, existing trees should be transplanted to suitable receptor sites prior to the commencement of works to minimise habitat loss.
- b) On the loss of geological material, the proposed excavation will generate approximately 51,462m³ of material. Approximately half of the excavated material will be reused on site or utilised as daily cover, while the remainder may require disposal at an authorised facility.
- c) Landscape character and visual amenity – the photomontages illustrate that the visual intrusion is major despite the mitigation measures proposed in the design. The presence of the facility will also negatively affect the cultural landscape value of Taž-Žebbuġija and Ta' Hammud archaeological sites. Nevertheless, the existing baseline is already characterised by the prominent presence of the adjacent landfill, which forms a dominant backdrop within the wider landscape. While the visual effects remain significant, it is recommended that additional design refinements and landscaping be explored during the finalisation of the project to further minimise these impacts.
- d) With regard to the loss of existing archaeological features and potential damage to unknown archaeological remains below ground, the impact is moderate. Such impact can be effectively minimised through the preservation of existing cultural heritage features *in situ* where feasible, or through their relocation to another suitable location where preservation is not possible. In addition, all ground-disturbing works should be subject to archaeological monitoring to minimise the risk of adverse effects on both known and previously unidentified cultural heritage features.

Any works affecting archaeological or cultural heritage features shall be undertaken only following the necessary clearance and approval from the Superintendence of Cultural Heritage (SCH), and in accordance with any conditions it may impose.

The proposed Material Recovery Facility is considered a high-priority project in Malta's efforts to strengthen the national waste management sector, achieve environmental targets, and fulfil its climate change obligations. It is identified in the Long-Term Waste Management Plan (2021–2030) as a key project to support the country's long-term vision of meeting the European Union's recycling targets. The proposal aligns with the objectives of the Plan by addressing the need to centralise and modernise Malta's waste management infrastructure, enhance resource recovery, and promote a more efficient and sustainable waste management system.

Cumulative impacts arising from the development of the Waste-to-Energy Facility (WTE), Organic Processing Plant (OPP), Material Recovery Facility (MRF), and Thermal Treatment Facility (TTF), as identified within the Waste Management Plan (2021–2030), are acknowledged.

The cumulative adverse significant impacts are related to land take-up and excavation, changes in land use, loss of agricultural land, terrestrial ecology, landscape and visual amenity. Such impacts are an inherent consequence of the centralisation approach established through the Waste Management Plan. The ERA notes that alternative design options have been assessed and that the proposed configuration incorporates appropriate mitigation measures. Furthermore, the do-nothing scenario is not considered an option, as it would hinder the implementation of the Waste Management Plan objectives and undermine Malta's efforts to improve waste management performance and reduce reliance on waste exports. In view of the unavoidable impacts associated with the permanent loss of land and ecological features, the ERA recommends that a comprehensive landscaping plan is implemented to minimise residual impacts and enhance the ecological value of the site.

Beneficial impacts also arise from the development of projects related to the expanded capacity for recycling (MRF) and treatment of hazardous waste (TTF), reduction of landfilling practices (OPP and WTE).

Following its assessment of the proposal, and taking into consideration the consultants' evaluation, the ERA considers that the long-term environmental and operational benefits of the proposal outweigh the identified adverse effects.

In view of the above considerations, the ERA does not object to this proposal, subject to the implementation of mitigation measures and pre-emptive safeguards throughout the construction and operation phases of the proposed development. In this regard, a number of conditions listed in Annex II are being recommended for inclusion in the development permit.

Yours faithfully,

Leonora D'Amato
Senior Environment Protection Officer
f/Director Regulatory Affairs

Disclaimer

The above comments are being issued without prejudice to any additional issues which are regulated by ERA through any relevant environmental permitting and, or compliance mechanisms, as well as to any environmental considerations that may be beyond the scope of the application under consideration.

The above assessment is based on the information provided to ERA in the application. Should it result that such information is incorrect, incomplete or misleading, or in the event of any omissions, or subsequent modifications, amendments or changes to the proposal, application and/or related submissions, the above assessment (including any favourable consideration, lack of objection, any proposed conditions or lack thereof, or any other equivalent stance, etc.) may need to be reopened to ERA's satisfaction. ERA shall not take responsibility for comments, assessments or judgments based on information that is incorrect, incomplete, missing or misleading, and which is only discovered after its assessment, nor for any environmental impacts resulting from developments, which it was not specifically consulted on. Furthermore, ERA also retains the right to take additional action should the information provided, or any incorrect, incomplete, missing or misleading details, be tantamount to fraud.