

MEMORANDUM

TO: Perit Vincent Cassar – Chairman

FROM: Christine Tanti – Unit Manager

CC: Kevin Mercieca – CEO
Aimee Brincat – Director
Alexander Camilleri – Deputy Director

DATE: August 2026

SUBJECT: EA/00042/20 - PA/04863/22
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.

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

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. Directorate'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 Directorate 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 Taż-Żebbuġija and Ta' Ħammud 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 Directorate 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 Directorate 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 Directorate considers that the long-term environmental and operational benefits of the proposal outweigh the identified adverse effects.

In view of the above considerations, the Directorate 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, the conditions listed in Section 5 below, are being recommended for inclusion in the development permit.

5. Recommended Conditions

5.1 Pre-Commencement Submissions

5.1.1 A comprehensive and reasonably exhaustive document is to be submitted, explaining how the proposed works will be carried out with the least possible damage to the site and its surroundings. The submission shall address all the relevant environmental considerations to ERA's satisfaction and shall include:

- a) A description of the envisaged works for each phase/stage of the project;
- b) The measures proposed to avoid, mitigate or reduce environmental impacts;
- c) A programme of works and proposed management arrangements for all the phases of the works;
- d) An environmental monitoring and reporting programme indicating how progress of works will be monitored, recorded and reported in a timely manner to enable immediate action, as required;
- e) A contingency plan for any risks of accidental damage and other potential risks to the environment; and
- f) Any relevant plans, drawings and photos related to the above.

No works shall commence on site prior to the approval by ERA of the submission.

5.1.2 In accordance with Regulation 5(4) of the *Construction and Demolition Waste Framework Regulations* (S.L. 549.161), the proposal requires the submission of a Pre-Demolition Audit (PDA) prior to the issuance of the commencement notice of works by the Building and Construction Authority. The PDA is to be submitted to the Environment and Resources Authority at through the following [link](#). The list of warranted architects, surveyors or duly qualified environmental consultants eligible to carry out such audits can be found [here](#).

5.1.3 Prior to the commencement of any works on site, ERA's compliance and enforcement Unit is to be formally notified at least five working days ahead on ced.consult.era@era.org.mt.

5.1.4 The proposed operations and interventions on protected trees would require an Environmental Permit pursuant to the Environmental Permitting (Procedure for Applications and their Determination) Regulations (S.L. 549.172).

5.2 Construction works

5.2.1 All works covered by this development permission (including material and temporary installations, vehicles and machinery used for the works as well as any material or waste generated by the works) shall be restricted to the areas approved for such purpose. Works outside such areas are prohibited and there shall be no encroachment or overspills onto surrounding land.

- 5.2.2 All works shall be carefully managed so as not to cause damage to any habitat beyond the area and depth approved for development.
- 5.2.3 Any infilled, caverns, hollows, Quaternary deposits or other features of potential geological, geomorphological or palaeontological interest which are known or discovered shall be reported immediately to ERA and any other relevant authorities (e.g. the Superintendence of Cultural Heritage). No further works or activities shall take place which would disturb or risk causing disturbance to these features, until these entities conclude their investigations.
- 5.2.4 No construction works shall be carried out during night-time hours. Any deviation from this requirement shall require the prior written approval of the Environment and Resources Authority (ERA), supported by a detailed justification and appropriate mitigation measures to minimise disturbance to the surrounding environment.

5.3 Waste management

- 5.3.1 All operations concerning the management of waste are subject to all relevant regulations, including the Waste Regulations (S.L.549.63) and the Waste Management (Activity Registration) Regulations (S.L.549.45).
- 5.3.2 Any excavated material generated shall be managed in line with the conclusions of the related land contamination study, i.e. *Site Clearance and Land Contamination Investigations* prepared for EA/00042/20.
- 5.3.3 Uncontaminated, inert material resulting from excavation, demolition and/or construction shall be used within the same site (as long as such use is in line with the approved plans and other conditions of this permit), or shall be transported in accordance with the relevant waste management regulations and deposited at sites duly authorised by the ERA to accept such waste.

5.4 Runoff and effluent management, and containment of overspills/pollutants

- 5.4.1 All measures shall be adopted to avoid overspills and pollution of the adjacent rural, coastal and marine environment, including through the action of adverse weather conditions
- 5.4.2 The development shall not result in any intended or unintended discharge of surface water (other than clean overflow from runoff-collection reservoirs), wash waters, operational effluents or overflows, sewage, spillages, seepages or leakages from the development site into the ground or onto any surrounding lands or into the sea.

5.5 Landscaping

5.5.1 A Comprehensive Landscaping Plan covering the Waste-to-Energy Facility (WTE), Organic Processing Plant (OPP), Material Recovery Facility (MRF), and Transfer and Treatment Facility (TTF) shall be submitted to ERA for approval. The Plan shall establish an integrated landscaping scheme for the ECOHIVE Complex with the aim of mitigating the visual, ecological and landscape impacts arising from the proposed developments.

- a) The Plan shall include, but not be limited to, the proposed planting strategy, species selection, planting layouts, ancillary and preparatory works, implementation phasing, long-term management and maintenance measures, physical screening measures, and any other interventions necessary to enhance the landscape character and ecological value of the site.
- b) The Plan shall incorporate appropriately designed physical barriers along the footprint and/or perimeter of the proposed development, where feasible, to minimise potential impacts associated with noise propagation, light spill and the dispersion of wind-blown materials into the surrounding environment, including nearby Natura 2000 sites and other sensitive ecological receptors. The design and integration of such barriers shall be compatible with the overall landscaping and shall consider opportunities for their incorporation with vegetated screening and other landscape mitigation measures.
- c) Any relevant conditions/ specification arising from the Nature permit/s shall also be factored within the comprehensive landscaping plan.
- d) The landscaping plan shall respect the site context and surrounding landscape, be adapted to the site's topography, landforms and ecological characteristics and locally appropriate species.
- e) Landscaping works shall be implemented in accordance with the approved Comprehensive Landscaping Plan, and any material amendments thereto shall require the prior written approval of the ERA.

5.6 Lighting plan

5.6.1 A Comprehensive Lighting Plan covering the Waste-to-Energy Facility (WTE), Organic Processing Plant (OPP), Material Recovery Facility (MRF), and Transfer and Treatment Facility (TTF) shall be submitted to ERA for approval. The Plan shall establish an integrated lighting strategy for the ECOHIVE Complex with the objective of avoiding and minimising light pollution and its potential impacts on the surrounding landscape, residential receptors, and biodiversity. The Plan shall include, but not be limited to, lighting layouts, luminaire specifications, lighting levels, shielding details, operational controls, and any other measures necessary to minimise light spill, glare and sky glow. The following minimum requirements shall be incorporated into the Plan:

- a) lighting shall be strictly limited to areas where it is operationally necessary, and the height, orientation and intensity of lighting shall be designed to minimise illumination beyond the developed footprint of the site, insofar as is reasonably practicable;

- b) lighting of ancillary access roads, tracks, paths or areas beyond the site boundary shall be limited to locations required for operational safety, security or emergency purposes;
- c) all exterior lighting fittings and their supports shall, where practicable, be located on the inner side of peripheral landscaping or otherwise screened to minimise visibility from surrounding areas;
- d) all external luminaires shall be horizontally aligned, downward-directed, fully shielded and full cut-off. Uplighters, unshielded luminaires and high-level floodlighting shall not be permitted unless demonstrated to be operationally essential and approved by the ERA;
- e) all external lighting shall utilise low-intensity warm-white lighting with a correlated colour temperature not exceeding 3000 K, unless a higher colour temperature is demonstrated to be necessary for operational safety or security;
- f) where operationally feasible, lighting shall be controlled through motion sensors, timers or other adaptive lighting systems to avoid unnecessary continuous illumination during night-time hours; and
- g) the approved Comprehensive Lighting Plan shall be implemented and maintained throughout the operational life of the developments. Material amendments affecting the environmental performance of the lighting system shall require ERA approval.