

Public consultation on the EIA and AA Reports (consultation period: 31/08/2025- 30/09/2025) – Comments received by ERA from consultees and the public

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

A. Light Pollution Awareness Group (email dated [01/09/2025])

<u>Comments</u>
I hope this e-mail finds you well. I am writing on behalf of the Light Pollution Awareness Group, a sub-group of the Astronomical Society of Malta. We would like to add the below guidelines for this proposal. The development is not to be a source of light pollution. To this effect: 1. Lighting should be strictly limited to within the developed part of the site. 2. The development hereby being permitted should not be considered as a justification for the lighting of the access roads, tracks and paths leading to the site or other lighting beyond the site boundary. 3. To mitigate light pollution, any external lighting should have a correlated colour temperature (CCT) lower than 2300 Kelvin, or spectral G-index ≥ 1.5, and employ lighting fixtures that are downward facing and full cut-off. 4. Lighting fixtures should illuminate only where needed to prevent light trespass. 5. Any illumination that is employed should take into account the reflectivity of the surrounding surface to mitigate skyglow as well as glare. 6. Any lighting that is not strictly necessary or in a less traveled area should be installed with a motion sensor to power off or dimmed when not required. 7. The lighting has to be from any peripheral landscaping inward, so as to be screened as much as possible by the landscaping itself. Moreover, the Planning Authority should request that as part of the works, should the present permit application be granted, ALL existing exterior lighting on site be changed to conform with above conditions. Adequate checks before and after the works should take place.

B. Superintendence of Cultural Heritage (email dated [18/09/2025])

<u>Comments</u>
Ref. Cultural Heritage Act 2002 (as amended) (CAP 445). Environmental Impact Assessment (EA/ 0042/22) i.c.w. (PA 4863/22) The proposed development of a new Materials Recovery Facility (MRF). The facility is being proposed to treat source-separated and co-mingled dry recyclables collected in Malta. The proposed development will form part of the ECOHIVE Complex and will operate in conjunction with the other waste management facilities at Magħtab. Review of results identified in the Environment Impact Assessment The Superintendence has assessed the data gathered and compiled in the reports entitled <i>Coordinated Assessment, Non-Technical Summary, Architectural, Archaeological, Historical & Cultural Heritage and Related Material Assets Study for the proposed Materials Recovery Facility (MRF) and Landscape Character & Visual Assessment in Relation to an Environmental Impact Assessment (EIA) for a new Materials Recovery Facility (MRF)</i>. Proposal The project involves the construction of a new Materials Recovery Facility. The facility is being proposed to treat source-separated and co-mingled dry recyclables collected in Malta. The proposed development will form part of the ECOHIVE Complex and will operate in conjunction with the other waste management facilities at Magħtab. The proposal also includes ancillary office space, staff quarters and parking spaces. Cultural Heritage Context The area proposed for development is located Outside Development Zone within the Magħtab area, in the limits of Naxxar. The 100m buffer established surrounding the site, referred to as the Area of Interest (Aoi) includes two scheduled cultural heritage features, located North and N-West to the Wasteserv main entrance, namely a pottery scatter discovered during archaeological investigations in the area and a megalithic

alignment (scheduled as Class B Taz Zebbugija megalithic remains). The Class A scheduled Ta' Hammud megalithic dolmens are also located approximately 350m from the eastern extent of the site and 250m east of the Aol.

Studies carried out in the area also indicate the presence of an ancient agricultural landscape mainly characterised by vine/agricultural trenches as well as other features forming part of the cultural landscape.

Architectural, Archaeological, Historical & Cultural Heritage and Related Material Assets Study for the proposed Materials Recovery Facility (MRF)

In addition to the scheduled sites referred to above, fieldwork within the Aol has also identified the presence of dry-stone huts (features A, B and D in figure 1, below), one of which has a corbelled roof (feature B).

The report notes that since the ones located within the Aol are well preserved, they should be considered a subject of architectural, cultural and ethnic value. As such it would be advisable to preserve these features by incorporating them in the landscape design or possibly relocating them to another part of the site. The Superintendence agrees with this conclusion.



Figure 1: Cultural Heritage Features Within the Aol

The report further recommends that due to the likelihood of unknown cultural heritage features being present on site, it is recommended that any eventual works are subject to archaeological monitoring. It would also be advisable, during the mentioned works, to observe a distance from contact with the listed cultural heritage interests of at least of 50 meters to ensure their safety. The Superintendence endorses these recommendations.

Landscape Character & Visual Assessment in Relation to an Environmental Impact Assessment (EIA) for a new Materials Recovery Facility (MRF)

The report notes that the proposed MRF building will be a substantial presence, especially when viewed in isolation, with the visual impact varying from minor to potentially significant adverse.

However, when considered in conjunction with the other facilities earmarked for the area, including the Waste to Energy Facility (WtE), of which the Outline Application has been approved, as well as the approved Organic Processing Plant (OPP), the Superintendence accepts the report's main premise that although the MRF occupies a prominent position and covers a large area, it is less impactful than the other waste management facilities earmarked for the area.

Nevertheless, while the report on *Architectural, Archaeological, Historical & Cultural Heritage and Related Material Assets Study for the proposed Materials Recovery Facility (MRF)* draws attention to the Class A scheduled Ta' Hammud megalithic dolmens, this feature is not considered in the section on visual impact. **In view of the feature's location approximately 140m from the S-East limit of the site, and 40m towards SE from the limits of the Aol, the project's visual impact on this feature is also to be evaluated.**

Design, Massing and Mitigation

The Superintendence draws attention to and endorses the consultants' recommendation that it is highly desirable that the facades of the MRF structures are finished in neutral earth-toned colours that will better blend into the surrounding landscape.

The Superintendence further recommends that the issue of visual impact from the scheduled dolmens is investigated. Following this evaluation, the introduction of mitigation measures may be required. This may potentially include further landscaping particularly to the south and east which will be most visible from the dolmens. Any additional design measure which may further mitigate the impact of the landscape would also be positively considered.

The report further concludes that the proposed development will directly impact cultural heritage features within the area earmarked for the MRF. The Superintendence endorses the recommendation that the best-preserved dry-stone huts within the site are preserved in situ or relocated, subject to appropriate methodologies.

The report also correctly highlights the potential of previously unknown of cultural heritage features being discovered during eventual works. The Superintendence therefore endorses the consultants' recommendation for the imposition of archaeological monitoring.

Conclusion and Recommendations

While the Superintendence is broadly in agreement with the conclusions of the EIA as presented, the omission of the assessment of the proposal's visual impact on the scheduled dolmens has limited the scope and effectiveness of the EIA.

The Superintendence therefore recommends that the sections on cultural heritage, and Landscape and Visual Impact Assessment and Mitigation measures are revised to include assessment of the potential impact on this feature as well as appropriate mitigation measures as may be required.

C. Environmental Health Department for Health Regulation (email dated [29/09/2025])

Comments

With reference to Environmental Impact Assessment dated August 2025 regarding subject indicated in caption, kindly be informed that this Directorate would like to submit the following comments/recommendations regarding this proposal.

Construction phase:

Should this proposal be accepted, the applicant is to adopt methods of best practice to ensure compliance with Environmental Management Construction Site Regulations during all phases of construction. Moreover, applicant is to implement all proposed mitigation measures to minimise nuisance and mitigate adverse air pollution (from dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors in the area of influence and to the general public. Hence a Construction Management Plan should be setup and implemented. This shall ensure adherence to proper site management practices in order to address ground and surface water pollution, to mitigate other adverse construction impacts, including construction traffic impacts and to ensure safety measures. Monitoring of construction works is also highly recommended to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.

All the vehicles and machinery used during the construction and operation phases have to be in good working conditions and adopt good working practices to prevent any spills and leakages of oil, fuels and lubricants from reaching the ground water and surface water. Safe and proper handling of raw materials on site should also be ensured. Any fuel, chemicals, oils and lubricants must be placed in a sealed and leak-proof container to minimise the risk of contamination through leakages into the underlying surface. The site shall be sealed with an impermeable layer such as geotextile material and impermeable layer of concrete to prevent underground contamination.

Mobile toilets present on scheme during the construction phase should be supplied with a wash hand basin and be adequately lighted and ventilated. The wash hand basin should be supplied with an adequate supply of potable water. The wastewater reservoir of the mobile toilets must be regularly emptied by licensed person to prevent any leakages of foul water onto the ground and area of influence.

Air pollution:

All necessary mitigation measures are to be implemented during the construction phase to reduce the level of air pollution. Measures to ensure the collection of surface water run-off, water used for dust control, water used for wheel washing and water used for general cleaning are to be adopted and maintained during construction and operational phase. If water spraying is used as a dust suppression technique to limit dust emissions, it must be treated with chlorine to prevent risk from Legionnaires' disease. It is to be noted that uncontrolled periodic spraying of excavated material with water to mitigate dust emissions may result in run-off slurry that could flow down and pool in low-lying areas. Similar nuisance may result from wheel washing with sprinklers and hence further mitigation measures, or else other de-dusting systems are to be considered. If any mist cannon equipment is used to suppress dust, the water used must be first class and treated with chlorine. It is of utmost importance that mitigation measures with respect to air quality are implemented so as to significantly reduce any impacts on public health resulting from the deterioration of air quality.

Light, Noise and Vibration pollution:

All the necessary mitigation measures during the construction and operation phase of the project are to be implemented to prevent and/or reduce the level of light, noise and vibration in the surrounding area.

Waste: With regards to waste generated during the construction works, the developer is to follow the waste management plan and waste handling procedures according to the Waste Management Policy. It is recommended that all proposed mitigation measures during the construction and operational phase, are to be strictly implemented by the applicant to mitigate as much as possible any adverse impacts on public health. No waste is to exit the site during the operation phase. No leachate is to reach the street from the transportation of waste, process and storage. Water: Rainwater, recovered water, and any other second-class water must not be used for human consumption and to supply wash hand basins and showers. If rainwater and any other second-class water is used for flushing apparatus, it has to be treated with a biocide prior use. The necessary measures to prevent or limit the risk of contamination of harvested rainwater shall be adopted. Rainwater reservoirs shall not be connected to the drainage system. In accordance with Legal Notice 5 of 2006, measures for the control of Legionella are to be duly implemented. These measures include the testing for Legionella in any process or system that may generate aerosols and pose a potential risk to workers and the general public. Furthermore, full compliance with the requirements set out in Schedules I to IV of the aforementioned Legal Notice is mandatory. A drip irrigation system is to be used for landscaping to minimise the release of water aerosols into the air during irrigation. No foul water is to exit the scheme during the construction and operation phase. Traffic: It is recommended that construction traffic follows specific established routes. Constructional waste should be adequately transported in covered vehicles to prevent dispersal of dusts. The wheels of such vehicles should be washed before vehicles exit the site. Other dust control measures to mitigate adverse dust impacts and nuisances from heavy vehicles during transportation should be taken. No dust, anthropogenic materials, water and/or liquid substance should drip and/ or fall from the transportation vehicles both during the construction and operational phase. All other mitigation measures which may be necessary to minimise nuisances and adverse health impacts from traffic during the operational and construction phases are to be implemented. Other issues: A Pest Control Management System is to be designed according to this proposal to prevent harbourage of pests. With regards to the Emergency Response Plan, in case of extreme events that may have an impact on the health of the general public, the Superintended of Public Health should be consulted and included as necessary in the plan. Conclusion: Since other waste treatment projects are being proposed and/or under construction within the area of influence and close to the site, it is recommended that any emissions are controlled and monitored. These shall take into consideration any other future development of this industry and any other plans in the proximity due to the possible long term and cumulative negative impacts to public health. Any other unpredicted impacts and nuisances which may arise and that may have a significant adverse effect on public health should be immediately addressed by the developer and the necessary mitigation measures taken. An 'Incident pollution control plan' should also be in place. Records of all pollution incidents, including any potential pollution of the surrounding environment, are also to be kept and reported to the respective authorities accordingly. Operators should also be made responsible for the cleaning of any construction and operation material, fuel, and oil that might exit the scheme. All the relevant Building and Sanitary Laws and Regulations should be strictly adhered to. All relevant complaints lodged should be investigated and remedial action taken immediately. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested. The Environmental Health Directorate (EHD) no longer retains competence over Legal Notice 297 of 2023, regulation of Water Intended for Human Consumption. Consequently, all responsibilities and matters pertaining to water intended for human consumption including, but not limited to, the registration and oversight of private water suppliers now fall under the remit of the Food Safety and Security Authority within the Ministry for Fisheries and Agriculture.
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D. BirdLife Malta (email dated [30/09/2025])

Comments
In response to the public consultation on the Environmental. Impact Assessment (EIA) for the proposed construction of a Material Recovery Facility (MRF) at the ECOHIVE complex, BirdLife Malta presents the following feedback and recommendations.

Change in Land Use

The site footprint is expected to take up 21,373 sq.m in total. Whilst it is acknowledged that downscaling might not be feasible, the alternatives have not been explored and presented in detail. The site footprint will significantly impact land use, yet effective and detailed mitigation and compensatory measures are not presented. It is recommended to evaluate the site footprint and propose methods to minimise, avoid, or compensate for the land use impact. For example, the 5,500m² for manoeuvring and access of vehicles is not properly justified and alternatives to this are not explored in detail.

Restoration of disturbed land and restoration and construction of new rubble walls in the Area of Influence should be considered as compensatory measures to compensate for the loss of habitats.

Landscaping

Whilst landscaping is proposed with a list of the trees to be planted, such landscaping merits further planning to compensate for the lost dense cover of low-lying trees and remnants of local maquis/advanced garigue community, which provide important habitats for avifauna and other fauna. To re-introduce bird species in areas where human impact increases, human involvement in the form of altering urban structures and incorporating bird-friendly infrastructure is necessary. The MRF facility will displace the habitat that the abandoned and undisturbed land offered to vertebrate fauna and will naturally increase human impact in the area.

Bird-friendly landscaping should be composed of layered vegetation with various heights and structures, such as tall trees, understory trees, shrubs, and ground cover. This type of landscape provides a range of nesting sites, perches, and hiding spots for birds. However, care should be taken, as incorporating vegetation in an urbanised area may expose birds to predators such as cats. Throughout the operational phase of the recycling facility, care should be taken to minimise the risk of a cat colony being established on site. In addition, surrounding vegetation near buildings can be reflected through the glass, resulting in bird strikes. A moderate approach to placement lies in planting vegetation further away from buildings. In addition, glass adjacent to the vegetation should have protection for birds.

Green roofs and walls which add value for birds may also be installed. Well-designed green roofs and roof gardens can become functional ecosystems, providing food and nest sites for birds. However, adapting green spaces onto the roofs of buildings themselves can reorient the direction of bird attraction and increase the risk of bird strikes. Glass adjacent to these features should also have protection for birds.

Bird Friendly Infrastructure

The MRF facility, will be surrounded by open spaces and vegetation and will inevitably attract birds, increasing the risk of collisions with any reflective surfaces of the infrastructure. Glass that reflects nearby shrubs and trees significantly raises the likelihood of bird strikes, underscoring the importance of thoughtful design to safeguard avifauna.

The two main ways how glass protection against bird strikes can be incorporated are by installing glass panels with a frit pattern and placing glass behind some type of screening. Research has shown that patterns covering as little as 5% of the total glass surface can deter 90% of strikes. Most birds will not attempt to fly through horizontal spaces less than 2 inches high nor through vertical spaces 4 inches wide or less. This concept is known as the 2" x4" Rule¹.

It is duly noted that in the EIA, it is suggested that the loss of breeding habitats of *Monticola solitarius*, the Blue Rock Thrush, and *Passer hispaniolensis*, the Spanish Sparrow, can be partially reversed by the installation of breeding facilities such as nest boxes at the buildings of the proposed development.

In this regard, we would like to highlight that when installing a nest box, it is essential to choose a design tailored to specific bird species you wish to attract. Different species have different requirements for entrance hole size, box dimensions, and mounting height. BirdLife Malta remains available to assist in designing nest boxes and placing them in correct places. The nest box must be installed in a location that is safe from predators, has some shade, and is within the preferred habitat of the target bird species, and is not located nearby a well-used path. To ensure the health of its inhabitants, nest boxes must be cleaned regularly for proper sanitation and prevent the establishment of parasites within the structure. It must be ensured that the birds have a clear flight path to the nest without any clutter directly in front of the entrance. The nest box must also be slightly bent forward so that any rain hitting the roof bounces off.

To facilitate breeding opportunities for the Blue Rock Thrush within the site, it is recommended that small openings to the outside are incorporated into any service rooms that will be infrequently used by staff. Such openings would provide access for birds, including the Blue Rock Thrush, to utilise these sheltered spaces for nesting and breeding purposes.

Sylvia melanocephala, the Sardinian Warbler, which was also recorded within the Area of Influence, typically nests in low-lying shrubs, within 80cm from the ground in low shrub. Therefore, we recommend that native low-lying bushes such as Spurge species (*Euphorbia* spp.) are included in the landscaping.

A bird bath is another excellent way to attract diverse bird species and provide them with essential fresh water, particularly during dry summer days. It offers birds a place to drink and bathe, helping maintain their feathers. Bird baths should have a shallow basin with a textured surface around the basin for traction. Bird baths should be regularly cleaned and refilled with chlorine-free water to ensure they remain a safe resource and must be placed among vegetation but away from windows to reduce the risk of collisions.

Lighting and Operational Times

During construction and operational phases, minimising light pollution is crucial due to its adverse environmental effects, such as bird disorientation and grounding. No extra light spillage is afforded along the coast and near Natura 2000 sites (MT0000007, MT0000008, MT0000105, MT0000112), considering the existing heavy light pollution in the Maghtab area, particularly along Tul Il-Kosta. Consulting ERA's 'Guidelines for Reduction of Light Pollution in the Maltese Islands' and BirdLife Malta's 'Guidelines for Ecologically Responsible Lighting' is recommended².

Whilst it is noted that nighttime activities are not being planned, we would like to further stress that nighttime activities utilising external lighting should not occur between June and November given that these months coincide with the fledging season of the Yelkouan and Scopoli's shearwater, where the risk of light-induced grounding is higher³.

Biosecurity

A state-of-the-art biosecurity plan is expected for the site. We anticipate efficient rodent control in outdoor areas to aid in keeping rodent populations at a minimum. Rodents are one of the biggest threats for nesting seabirds on the Maltese islands and BirdLife Malta is continuously working on maintaining good biosecurity for the protection of nesting sites. While we support the implementation of an efficient pest control system on site, we would like to highlight the importance of incorporating ecological considerations into the pest control activities carried out during the operational phase of the project.

The use of pest control devices such as sticky insect tape and glue traps for rodents can have harmful impacts on wildlife. These devices inadvertently capture various insects that are essential food sources for birds and other fauna on-site. Additionally, birds and other animals, such as lizards and hedgehogs, may become trapped, leading to injury or death.

For controlling rats and rodents, we recommend using devices like GoodNature E2 traps and toxic blocks housed within closed bait stations. These alternatives are designed to be inaccessible to non-target species, making them a more environmentally responsible choice compared to glue traps.

Noise and Dust Protection

It is acknowledged that adherence to best practice procedures to keep noise pollution and dust production and dispersal at the construction site at a minimum is highlighted in the EIA. Nonetheless, details on the best practices are lacking. Dust suppression techniques should be a focus for reducing levels of dust generation including spraying water on dirt roads and reducing vehicle speed along such roads. Trampling on surrounding land by heavy machinery used during construction should be kept to a minimum and mitigation measures clearly stated such as clearly marking access routes.

'Sheppard, C. (2012). Resource Guide for Bird-friendly Building Design. American Bird Conservancy.
<https://abcbirds.org/wp-content/uploads/2015/05/Bird-friendly-Building-GuideLINKS.pdf>.

2 Crymble, J. (2021). GUIDELINES FOR ECOLOGICALLY RESPONSIBLE LIGHTING. BirdLife Malta.
<https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>.

3 Crymble, J., Mula-Laguna, J., Austad, M., et al. (2020). Identifying light-induced grounding hotspots for Maltese seabirds. 2020.