



Public Consultation Submissions & Responses

Noise Action Plan for Malta

January 2023

Environment & Resources Authority



CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Clifford Borg Ambjent Malta 22/11/2022	Please find a suggestion for the Noise Action Plan. Ambjent Malta considers abatement measures like green infrastructure and urban greening in noise sensitive areas to be considered and implemented for new projects at project design stage and possibly coupled with noise barriers. There is sufficient scientific evidence that plants and green infrastructure/urban greening can reduce noise levels and should be considered further in the Action plan.	Comment is noted. ERA supports the principle to reduce the effect of noise through the most efficient measures to provide a better noise level, including through the application of green infrastructure, as may be applicable.
2	Patrick Calleja Architects Studio 29/11/2022	The shooting range in San Blas Bay is along the side of a protected valley. The noise from the incessant shooting is unbearable and is worst on weekends when people are trying to enjoy the countryside. There is no reason why any shooting range should be in an open area. Shooting ranges should be internal within sound proofed structures.	Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC.
3	Gest Gast 06/12/2022	1. Construction Time limits are not respected. 7am is the current time limit but noise caused by trucks and workers carrying equipment (or materials) starts earlier. Including the prohibition of the 2 activities above, within certain timeframes in legislation might help. Keeping the quiet hours outside the limits of 8am to 15:00 and 18:00-22:00 could also work.	Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC. Nevertheless, this comment has been referred to the relevant authority.
		2. Roads Honking of trucks needs to be prohibited. Trucks with pneumatic horns are constantly exceeding noise limits, not respecting quiet hours in Malta. Measures shall also include regular cars delivering a service.	Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC. Nevertheless, this comment has been referred to the relevant authority.

		<p>The situation in many areas is unboreable and unacceptable. Deliveries (including Gass) can be held by appointments and phone calls instead.</p> <p>3. Legislative measures need to be taken. The noise level in residential areas should not exceed 55 decibels during the daytime and 40 decibels at night, by any means. Strict limits shall apply to natural areas hosting noise sensitive ecosystems. Strict measures need to be established in order to prevent violations.</p> <p>The above recommendations already apply to most of the EU countries. Why not yet in Malta?</p>	
			<p>Although the Environmental Noise Directive does not pose any mandatory limit values in place, the NAP will be updated to reflect any developments at an EU level.</p>
4	<p>Priscilla Ann Agius Technical Regulations Division, Malta Competition and Consumer Affairs Authority 06/12/2022</p>	<p>Section 3.1.6 Sound level requirements and measurements for Union Type-Approval, Pg. 29, 1st paragraph it states that <i>“as an EU Regulation, Regulation (EU) 2019/2144 is directly applicable in all Member States and is implemented in national legislation through S.L. 427.23.”</i></p> <p>Whilst it is correct that Regulation (EU) 2018/2144 is directly applicable, it is not listed under S.L. 427.23, and thus <i>“and implemented in national legislation through S.L. 427.23” should be removed.</i></p> <p>On pg.29, the document makes reference to Regulation (EU) 540/2014. It might be worth to mention, for the sake of completeness, that this legislation has been amended by <u>Regulation (EU) 2019/839</u> and <u>Regulation (EU) 2017/1576</u>.</p> <p>Furthermore, it states that <i>“It established a new permitted noise limit of 74 dB(A) for new vehicles and made it illegal to modify the exhaust system of a vehicle in such a way that the noise level recorded will be higher than that recorded at type approval. The</i></p>	<p>Comment noted and NAP will be updated accordingly.</p> <p>Comment noted and NAP will be updated accordingly.</p>

		<p><i>Regulation also phases in stricter noise limits over 10 years, together with a revised, more representative test procedure. By 2026, the limit for most new passenger cars will be <u>68 dB(A)</u>.”</i></p> <p>Annex III of <u>Regulation (EU) 540/2014</u> stipulates the Noise Limit values. The range of limit values varies according to vehicle category (M1, M2, M3, N1, N2, N3) and description of vehicle category, so there isn't one value but a range of applicable values. The established permitted noise limits for first registration 1st July 2022 range between 70dB(A) – 81dB(A), whilst the range for first registration as from 1st July 2026 range between 68dB(A) – 79dB(A).</p>	
		<p>Pg. 44, section 5.2.5, MCCAAs recommends rewording the text as follows given that the current wording is not correct:</p> <p><i>“In the context of noise, the MCCAAs is responsible for the implementation of Union harmonised legislation concerning certain equipment used outdoors that is within scope of Directive 2000/14/EC. Economic operators supplying such equipment for the first time within the EU are obliged to ensure that they only make available compliant products. The enforcement of this directive at the placing on the market stage is performed by MCCAAs. has, within its remit, the placing and/or making available on the market, and the market surveillance of products falling under the Product Safety Act (CAP 427). To be placed or made available on the market, items from these categories must fulfil, amongst others, sound level requirements if such requirements are defined in relevant harmonised legislation.</i></p> <p><i>Moreover, concerning new automotive items, the MCCAAs may issue EC type-approval or EU type-approval, which is necessary for placing or making available on the market, and which is based on</i></p>	<p>Comment noted and NAP will be updated accordingly.</p>

		<i>requirements that are harmonised at Union or international level, mutually recognised and accepted by all Member States of the EU, and where appropriate, includes sound level testing according to harmonised test procedures and conditions.”</i>	
5	Dr Roberto Debono Office of the Superintendent of Public Health 15/12/2022	The Office of the Superintendent of Public Health (SPH) appreciates to have been consulted early in the drafting of the <i>Noise Action Plan 2019 – 2024</i> . It is a pleasure to note that the Noise Action Plan (NAP) is inspired by the <i>rationale</i> that noise constitutes a serious concern to human health. Reference is made to the <i>WHO’s Environmental Noise Guidelines for the European Region</i> ₁ (2018) which set noise thresholds for day-time (L_{den} 24 hour average) and night-time noise (L_{night} 23:00 – 7:00) based on a sound systematic review of the academic literature on the health effects of noise pollution. It is a pleasure to note that the document states that the WHO guidelines are used as the basis for this action plan to address environmental noise pollution.	Comment noted.
		Indeed, as described in the document, noise pollution is a serious concern to human health. Exposure to higher background noise levels has been associated with an increased incidence of ischaemic heart disease. There may also be an increased risk for high blood pressure. Noise is also associated with sleep disturbance and high noise annoyance, affecting the health, the wellbeing, academic progress, the quality of life and the productivity of around 70,000 persons in Malta. Taking the example of road transport, which is the single most important contributor to background noise in Malta, whereas the WHO guidelines stipulate 53dB L_{den} and 45 dB L_{night} as the thresholds to protect against significant human health effects, the last noise mapping exercise (R3, 2016) shows that around 30,000 Maltese people are exposed to very high background noise levels exceeding 65dB L_{den} and 55dB L_{night} . These people have approximately a 10% increased risk of suffering from heart	Comment noted.

		<p>disease over people exposed to background noise levels below 53dB L_{den}. It is concerning to note that the trend from 2011 (notwithstanding differences in the noise calculation models between R2 and R3) shows that the number of people exposed to harmful background noise pollution is increasing. This is probably due to an increase in motorised road traffic close to where people live and, to a much lesser extent, to an increase in daytime air traffic.</p>	
		<p>People who are exposed to excessive levels of noise pollution are also likely to be exposed to air pollution and to the pronounced effects of heatwaves during summer due to an urban heat island effect. This is because the principal source of background noise pollution and air pollution in Malta is motorised car traffic. Exposure to noise pollution represents an issue of health inequity for public health. This means that the people who are vulnerable and who are financially disadvantaged in Maltese society, including people with a higher propensity for mental health issues and chronic diseases, are the ones who are carrying a disproportionate share of the burden of noise pollution.</p>	<p>Comment noted.</p>
		<p>There is a pressing need to address noise pollution more effectively. This need is reflected in the reference to the adverse human health effects of noise pollution in the most recent strategies and plans across government. As already described in the NAP, these include the National Environment and Health Action Plan (2012), the Strategic Plan for the Environment and Development (SPED, 2015), the National Transport Strategy 2050 and the Malta Transport Masterplan 2025, and the National Strategy for the Environment 2050, among others.</p>	<p>Comment noted.</p>
		<p>Importantly, noise pollution is perceived as a comparatively serious concern by Maltese residents. In 2019, 21% of surveyed Maltese considered noise pollution as one of four environmental</p>	<p>Comment noted.</p>

		<p>issues which they considered to be most important, when compared to 9% of the EU28 average.</p>	
		<p>The SPH notes with pleasure that in its action plan, ERA gives priority to noise-sensitive locations including homes for older persons, schools, parks and playgrounds, and hospitals. ERA has also stated to extend this consideration to retreat houses which are important for people to restore their spiritual and mental health. Since background noise pollution has been potentially associated with ‘cognitive impairment – including the impact on children’s reading and education’, as described in the document, it is notable to note that 44% of schools in Malta are exposed to varying degrees of harmful day-time background noise pollution. An in-depth study to assess exposure to noise levels from the classrooms and from the school playgrounds would be warranted and should be included in the next round of noise mapping (R4). Similarly, 38% of buildings on hospital grounds are exposed to above-threshold levels of daytime or night-time noise levels. An in-depth study to assess exposure to noise levels in wards and areas inhabited by patients and healthcare workers would be warranted. Such studies should also be extended to include children’s playgrounds, residential care facilities and retreat houses, and should be included in the next round of noise mapping (R4).</p>	<p>Comment noted. It is to be noted that the NAP focuses on environmental noise and therefore considers noise exposure in open areas. In fact, as indicated in your comment, other sensitive receptors such as playgrounds, elderly homes etc will be considered in the next noise mapping exercise as part of the noise exposure assessment.</p>
		<p>The office of the SPH also notes that there are other important sources of noise pollution that fall outside the scope of the NAP and recommends that these should be mentioned nonetheless in view of their adverse effects on health. Construction noise, noise from shooting ranges, entertainment noise, neighbourhood noise, and noise from outdoor devices fall outside the scope of the Noise Action Plan and of the Environmental Noise Directive. In the NAP for Malta, the rightful concerns by residents about</p>	<p>Comment noted. It is to be noted that existing legislative framework relating to noise sources that fall outside the END scope, are already in place under the respective relevant entities.</p>

		<p>these sources of noise pollution should be heard and acted upon by the responsible entities.</p>	
		<p>Excessive levels of night-time noise from the entertainment industry in the early hours of the morning disturbs the sleep of Maltese residents. Sleep disturbance has tremendous adverse effects on physical and mental health and wellbeing, children's educational progress and development, and the productivity of Maltese people. Even though noise from the entertainment industry is not mapped and falls outside the scope of the NAP, the SPH suggests that these concerns are not ignored and that these actively passed on to the relevant authorities under the respective legislation for prompt action to be taken to preserve the health of thousands of Maltese people affected adversely by this type of noise. Specifically, the remarks raised by Mosta, St. Julian's, Attard, Żebbuġ, Valletta and Iklin residents made with regard to serious sleep disturbance from entertainment noise at night, but which also applies to other areas of the Maltese islands, should not go unheeded. It would be cautiously suggested that the entertainment industry, in term of noise management, is managed in a similar way to IPPC licensed industrial facilities through the application of the Best Available Techniques (BAT) as regulated by the EU Industrial Emissions Directive.</p>	<p>Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC. Nevertheless, this comment has been referred to the relevant authorities.</p>
		<p>The SPH also notes that construction noise is an important determinant of health and productivity. With an increased uptake of remote working, places where people live are increasingly becoming places where people work. Furthermore, many noise-sensitive locations such as schools are located in residential areas and are affected by construction noise in residential areas. Legislation that places limits on the extent of noise and vibration from noise-emitting devices in residential areas and close to</p>	<p>Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC. This comment will be submitted to the Building and Construction Authority (BCA). With respect to the comment made in relation to economic studies, it is to be noted that as part of the implementation of the NAP a Cost Benefit Analysis will be conducted to assess health and social benefits from the proposed measures in</p>

		<p>noise-sensitive locations, including construction machinery, should be drafted or updated. Such machinery used in residential areas might need to be smaller, possibly less powerful and definitely quieter. The preservation of human health is paramount. Economic studies that assess loss of working hours and loss of educational development due to noise disturbance, should be considered when assessing the efficiency of operation of the construction industry.</p>	<p>the NAP for the noise sources within scope of the Environmental Noise Directive.</p>
		<p>Finally, the SPH maintains that in line with the hierarchy of hazard control, noise pollution should be addressed at source, where possible. Only if addressing noise pollution at source is unfeasible, should the mitigation of noise in its path be considered. Caution must be exercised on the installation of noise barriers to the aesthetic qualities of the place where such barriers are installed because the aesthetic quality and appeal of neighbourhoods is closely linked to human health and wellbeing.</p>	<p>Comment noted and ERA is aware of the concerns mentioned.</p>
		<p>In line with the importance of addressing noise pollution at source and the fact that the principal source of background noise pollution in Malta is road traffic, the SPH holds that walking, cycling, the safe use of micro-mobility, and public transport use should be promoted aggressively to reduce noise pollution. The NAP correctly identifies road surface maintenance, the applicability of low noise asphalt, the electrification of mobility, roadside inspection of noise emissions from cars and motorcycles, the mainstreaming of noise in land-use policies, and good acoustic design in new infrastructural developments, as measures to reduce noise at source. However, there is a lack of emphasis in the NAP on the critical role that a modal shift from car use to active mobility and public transport play to reduce noise at source. The NAP fails to list any measures that promote walking, cycling and the use of public transport even though it</p>	<p>Comment is noted and will be considered.</p>

		<p>acknowledges that ‘another alternative means of modal shift from motorised individual transport to low noise emission means of transport, is through the use of public transport, walking and cycling’. It makes indirect references to the ‘development and the designation of pedestrian and cycling zones’, and the promotion of use of ‘bike sharing’ but maintains an almost exclusive focus on car-centric measures in the area of mobility noise management.</p>	
		<p>The SPH maintains that a modal shift to active mobility (walking and cycling) and the extensive promotion of public transport use should be listed separately in the action plan as a cross-cutting measure to address noise at source. Specifically, the Noise Action Plan should list the development of an updated national cycling strategy and the development of a first national walking strategy in line with international best practice, where walking and cycling are considered at least <i>at par</i> with other transport modalities. This emphasis is being made also in view of the fact that measures that have corollary positive effects on human health and development should be prioritised. To mention one example, whereas the study on low noise asphalt can possibly generate findings that have positive effects on addressing noise at source, a modal shift from car-centric mobility to active mobility is a sure way to reduce noise at source, lead to cleaner air, lower carbon emissions, make roads safer, lead to tremendous financial savings on car imports and fuel costs, generate opportunities for physical activity, lower the incidence of obesity and chronic diseases such as diabetes and hypertension, lower healthcare costs, and sustain the financial sustainability of the national health system.</p>	<p>Comment is noted. ERA supports the implementation of this policy (national cycling strategy and walking strategy) as it notes potential benefit to noise, among others.</p>
		<p>For the aforementioned reasons, the SPH sustains that the Noise Action Plan should list the following action point separately and prominently in its action plan: ‘On the basis that 1) road</p>	<p>Comment is noted and will be considered.</p>

		<p><i>transport remains the principal and most important source of background noise pollution in Malta, 2) road transport is also a significant contributor to air pollution and greenhouse gas emissions 3) mobility issues contribute to the obesogenic environments that are partially responsible for the low rates of physical activity in Malta and 4) the aforementioned place additional burden and thus threaten the sustainability of the national health system; MTIP/TM/IM should aggressively push for and pursue a modal shift from car-centric mobility to active mobility and public/collective transport, in addition to promoting the electrification of all types of mobility. Specifically, TM should update the national cycling strategy and develop the first national walking strategy that should include as a minimum the provision of extensive safe national cycling and walking infrastructure that connects places where people live, work, learn and play, and intermodally with the provision of public transport services and other means of mobility.'</i></p>	
6	<p>Miriam Cremona 19/12/2022</p>	<p>Valletta receives noise as a nuisance/disturbance and as noise pollution from the major areas hereunder:</p> <ul style="list-style-type: none"> · Road traffic and delivery trucks; · Air traffic; planes and drones fly over Valletta sporadically; · Noise from construction, percussion tools, cranes and workers yelling from the top of these cranes; · Entertainment activities-; most activities should not take place in Valletta a World Heritage Site; · Catering Establishments; groups of diners stop in corners chatting in very loud voices at 2/3.00 am – no notices informing these uncivilised people that there are residents living there trying to sleep. Inebriated customers feel that they can yell at the tops of their voices with senseless laughter at dead of night – 	<p>Comment is noted and indeed the NAP address measures relating to prohibition of heavy vehicles passing through sensitive areas and restriction of night-time deliveries. Furthermore, review of the arrival and departure routes and air space design are part of the NAP proposed measures. Reference to other noise sources is not within the scope of the NAP and Directive 2002/49/EC.</p>

		<p>tourism patrols would help to control these inconveniences – naturally these are non-existent.</p> <ul style="list-style-type: none"> · Cruise Liner Terminal: noise of crowds and hordes of passengers which crowd the streets, vehicles transporting tourists with taped information about Valletta’s history. <p>Noise everywhere, every day and at all hours of the day and night.</p>	
		<p><i>a. To outline a long-term plan aiming to avoid, prevent and reduce environmental noise, where necessary, and particularly where exposure levels can induce harmful effects on human health and preserving environmental noise quality where it is good.</i></p> <p>Such a plan is long overdue. Valletta has been at the receiving end of misguided and uninformed decisions as to what Valletta needed to be revived. This so-called ‘revival’ has meant the over commercialisation of Valletta. Revival need not, SHOULD NOT mean that radios, hifis, music boxes, musicians and singers can blast away at deafening levels of sound until the early hours of the morning every day, paused only for a few hours to start again the very next morning.</p> <p>The result is that residents are being driven away and are being replaced by catering establishments, tables and chairs and unruly visitors who shout at every street corner as they leave the catering establishments – at 1.00 am, 2.00 am even later. There are no signs informing such visitors and customers that there are still some people living in Valletta who have families who have to wake up for school or work the next day - children and babies who are woken up half way through the night with all the shouting underneath their windows, the elderly, the sick and customers of the much-vaunted luxury Boutique hotels.</p>	<p>Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC. Nevertheless, this comment has been referred to the relevant authority.</p>

		<p>b. <i>To set out objectives for the monitoring and management of environmental noise in Malta.</i> The objective should primarily be to reach a fair balance between commercial activities, construction, building and development, tourism and residents. One aspect should not overwhelm the others.</p>	<p>Comment is noted, however the mentioned sources are outside the scope of the NAP and Directive 2002/49/EC.</p>
		<p>c. <i>To take a staged approach on a prioritised basis due to long-term exposure to environmental noise, in assessing the existing levels of environmental noise from the different noise sources to identify potential locations for actions.</i> A quick tour of Merchants Street and Old Theatre Street will highlight the areas in Valletta for priority action. The atmosphere is one of decadence, shabbiness – a louder and shabbier version of Paceville. The excessive permits and concessions being given by the Planning Authority, the Lands Authority, the Local Council and the Malta Tourism Authority together with a total lack of enforcement have created a serious degeneration of Valletta which from a recently restored and up-graded City has become a crowded, chaotic messy and noisy city – totally unliveable – a very, very far cry from the European City of Culture it once was and a UNESCO World Heritage Site.</p>	<p>Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC.</p>
		<p>d. <i>To preserve relatively quiet areas in the agglomeration and in open countryside through the identification and delineation of such areas</i> Valletta is part of the agglomeration areas as shown in Figure 7, and in the case of Valletta quiet areas need to be re-created. What were once quiet areas and areas delineated by the then MEPA as strictly residential such as Doc 5 have been disrupted by misguided decisions by: 1. the Planning Authority and its Tribunals/ and the earlier MEPA; Document 5 which delineates specific areas as residential has been totally ignored and commercial permits granted all over</p>	<p>Comment is noted and is not within the scope of the NAP and Directive 2002/49/EC. Each separate comment will be passed to the indicated authorities as mentioned in the comment.</p>

		<p>Valletta– one chairwoman actually stated to me during a sitting that she did not take any notice of such documents!</p> <p>2. The Malta Tourism Authority (MTA) The MTA which regulates the licensing of bars, restaurants and nightclubs, and which has powers to control noise, ranging from kitchen equipment, to entertainment and leisure activities – is quite plainly not doing what it is supposed to be doing – controlling noise – <u>noise which is not only a nuisance but qualifies as noise pollution.</u></p> <p>3. Local Councils: The Valletta Local Council can issue permits to applicants to carry out activities in terms of S.L. 441.04. The L.C. does not regulate – it just gives out permits without going into the effect and the inconvenience such permits will have on the residents. It should regulate noise generating equipment permits even if it is only occasional entertainment - however this regulation is totally conspicuous by its absence. Not only is that not happening but the LC actually gave a permit for a disco party to be held in Old Theatre Street last July prior to the Carmelite feast. Full blown disco equipment was set up in front of the Oratory in this narrow street at 11.00 am and the equipment was switched on at full blast – so loud that the walls of my house were vibrating – and it went on until 5pm. Giving the Local Councils the power to grant even short-term licences shows how little the authorities know how such licences are granted. The Local Councils are manned by employees whose main interest is ensuring that one church festa is “ better therefore louder” than the other. The Mayor and the Councillors need votes and therefore permits are granted indiscriminately. The attitude is ‘mhux ta darba’!! However, that “darba”, that one time over a period of four hours leaves untold damage to the hearing of the residents in the area – ears which become numb for a number of days. The END indicates that the action plan should take due consideration of the locations</p>	
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		<p>which will be considered to be noise sensitive and residential dwellings in a narrow street are certainly noise sensitive.</p> <p>4. The Police A number of articles under the Code of Police Laws make reference to either noise or nuisance; These laws cover street and certain licensed activities. However, if the police are called in to control the noise disturbance such as that created by the Carmelite disco party mentioned above, their reply is that if they have a permit from the Local Council then, they cannot do anything.</p> <p>5. Transport Malta (TM) Transport Malta is responsible for developing integrated transport policies which include the transport vehicles of goods and food to catering establishments in Valletta. Their policies are supposed to be aimed at non-polluting strategies (including noise pollution) and the regulation of vehicle noise emission standards through vehicle licensing and roadworthiness testing. The TM policies have obviously not reached Valletta since every day food transportation vehicles are parked in the middle of the roads or in front of peoples' front doors with engines running emitting diesel and petrol fumes into the street and houses. These huge delivery trucks block ongoing traffic inviting enraged drivers to hoot their car horns in frustration. Fancy words and statements such as <i>"TM has established a strategic approach to transportation by integrating the planning of the different transportation sectors"</i> ring hollow! The only strategy needed is the provision of a few parking spaces on the ring road for these delivery trucks and the actual deliveries are then done by smaller trolley vehicles – it is not exactly rocket science – just a little bit of common sense. Naturally frequent checking and enforcement are necessary to ensure that these loading and unloading bays are left clear for the delivery trucks, the road licences of which should clearly show that they are in fact delivery trucks.</p>	
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		<p>All noise, be it considered a nuisance or noise pollution should be controlled. There is no question of interpretation since what is slight for some is serious for a sick person or a mother trying to put her child to sleep. All noise and all disturbances are unacceptable. Different people at the various entities interpret noise in different ways which means that the application of the law controlling noise is not consistent and enforcement therefore is not always applied. These are the issues which need to be looked into. I have highlighted the situation in Valletta – most of my concerns also apply to places like Sliema and St Julian’s – in fact wherever the commercial aspect has been allowed to disrupt a fair balance between residents and commercial activities.</p>	
7	<p>Marie-Therese Camenzuli</p>	<p>More than three years have passed since the submission of the public comments on the aims and objectives of this action plan. The plan, when published, will operate until 2024. The KA notes that the slippage in the drafting and eventual implementation of the action plan and its updates need to be addressed with urgency. In the absence of adequate and timely action, environmental noise and other noise, even though not falling within the narrow definition of the Environmental Noise, is a threat to residents’ mental health.</p>	<p>Comment noted.</p>
	<p>Kummissjoni Interdjoċesana Ambjent</p> <p>19/12/2022</p>	<p>The KA insists on the original comments it had submitted in the first public consultation of more than three years ago. The comments had stated that “in certain areas of the country the long uninterrupted noise that breaks the evening and night silence especially by music from hotels and open-air discos, among other sources, whether on or close to beaches or inland”. ERA’s response to the comment was that “neighbourhood noise, noise nuisance, entertainment and construction noise do not fall within the scope of Subsidiary Legislation 549.37 that transposes the Environment Noise Directive.” It is because of this reason that the KA had stated in its comments of 2019 that “if certain noises do not fall within the scope of the Environment Noise Directive,</p>	<p>Comment noted, one may wish to approach other competent authorities for specific ad-hoc noise sources.</p>

		<p>then ERA needs to draw up an action plan to deal with such noises that on a daily or weekend basis are consistently negatively affecting many people”.</p>	
		<p>Unfortunately, ERA concentrated only on EU-dictated requirements which are of course fundamental. But in the case of Malta, the most densely populated country in Europe, other sources of noise need to be addressed with the same urgency as other noise sources listed in the EU Directive. If all other EU countries in the EU had the same population density as Malta, then the Directive requirements would be wider than they currently are. If ERA does not take the initiative to address this issue, then the authorities to whom and to which ERA is accountable should take action to address this issue and have such sources of noise nuisance addressed adequately.</p>	<p>Comment noted and in fact the NAP makes specific reference to various International, EU and national regulations and policies which cover other noise sources falling outside the scope of the plan and the END.</p>
		<p>Seven years have passed since the KA made this appeal to the authorities to address this issue when in December 2015 it had published a set of proposals inspired by the Encyclical <i>Laudato Si`</i>. The KA had invited Government, the Planning Authority and the Environment and Resources Authority “to ensure that the environment is safeguarded for the enjoyment of the public in search of peace and quiet”. It is easier to tackle sources of noise pollution that do not present political challenges than others that do so. If such an attitude persists, then this means that the noise problem will continue to grow unabated, and people will continue to suffer.</p>	<p>Comment noted and please refer to the above response.</p>