

The Executive Chairperson
Planning Authority
St. Francis Ravelin
Floriana

Date: 10 August 2026
ERA Ref: EA 00020/22

Dear Sir/Madam,

Planning Ref.: PA/06096/23

Description Proposal: Proposed Thermal Treatment Facility in the ECOHIVE Complex, including plant building, storage building, administration building, waste water treatment, tank farm and cisterns

Location: Site at, ECOHIVE Complex, Tul il-Kosta, 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/06096/23 is a full development application for a Thermal Treatment Facility (TTF) within the ECOHIVE Complex for the incineration of hazardous waste.

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 I, Section 5.0.1.1: *Waste disposal installations for the incineration, chemical treatment (as defined in Annex I to Directive 2008/98/EC on waste under heading D9), or landfilling of hazardous waste as defined in that Directive.*

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) given the location and potential impacts of the proposal vis-à-vis the following Natura 2000 sites:

- MT0000007- Is-Salini designated as a terrestrial Special Area of Conservation via Government Notice 1379 of 2016; and
- 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-06096-23/>.

2. Overview and main findings of the EIA Report

The EIA Coordinated Assessment has identified a number of moderate and major residual adverse impacts on land use, agricultural land and terrestrial ecology, landscape character and visual amenity, water bodies (groundwater recharge), archaeology.

Land use, agricultural land and terrestrial ecology

- The change of land use is assessed as *major adverse*.
- The loss of agricultural land will lead to an overall loss of ODZ land from the excavation and construction of the facility; such impact is assessed as *moderate to major adverse*.
- Loss of terrestrial habitats and species - *moderate adverse* since circa 85 trees will be affected, 50 of which are of protected species.
- Loss of soil, rubble walls and ecological characteristics are assessed as *moderate adverse*.

Landscape and visual amenity

- Deterioration of the landscape value during construction works at 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 assessed as *moderate adverse*.
- Reduction of the visual amenity of potential visual receptors from Viewpoints 3, 4, 5 and 7 due to the presence of construction and excavation machinery, cranes; dust; noise; vibration and associated works is assessed as *moderate adverse*.
- Deterioration of the landscape value during operations due to the presence of TTF Building at ECOHIVE complex and take up of agricultural land on the landscape elements is assessed as follows:
 - Viewpoints 1, 2, 6 and 7: *major adverse*; and
 - Viewpoints 3 to 5: *moderate adverse*.

- Reduced visual amenity from Viewpoints 3, 4, 5 and 7 due to the presence of TTF Building at ECOHIVE complex and take up of agricultural land on potential visual receptors is *moderate adverse*.

Water bodies

- Groundwater salinisation due to paving of agricultural areas resulting in depletion of groundwater recharge is *moderate adverse*.
- Flooding due to paving agricultural areas resulting in increase of runoff flow rates is *moderate adverse*.

Archaeology and cultural heritage

- Loss of features and change in the context and cultural landscape resulting from excavation and demolition/ dismantling of rural structures is assessed as *moderate adverse*.
- Potential damage to cultural and/or archaeological features below the ground during excavation works is *moderate adverse*.
- Deterioration of cultural landscape resulting from the construction phase and the presence of the proposed development once constructed is *major adverse*.

Beneficial residual impacts

- The improved capacity to treat hazardous waste is *major beneficial*.

Cumulative residual impacts

- Flooding of the water catchment resulting from paving of agricultural areas is *moderate 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 are *moderate adverse*; and
- Change in land use from existing agricultural land is *major adverse* even after the implementation of mitigation measures (i.e. landscaping).

3. Overview and main findings of the AA Report

The AA report concluded that the proposed development is unlikely to have significant adverse effects on nearby Natura 2000 sites due to its considerable distance from these protected areas. Potential impacts are mainly indirect and include light pollution, noise, dust generation, and atmospheric emissions from the facility. The most notable risk concerns light pollution, which could disturb protected seabird species associated with the marine SPA and increase the risk of disorientation and grounding. Construction activities may also temporarily affect species in surrounding agricultural areas. However, impacts on habitats and species are expected to be effectively mitigated through the

implementation of Best Available Techniques (BAT), emission controls, and other good practice measures in line with light pollution guidelines.

Residual impacts on habitats, protected species, and ecological processes are considered insignificant and 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 residual impacts on land use, agricultural land and terrestrial ecology, landscape and visual amenity, water bodies and archaeology and cultural heritage. With respect to the latter, the ERA has the following conclusions and recommendations:

- a) With regards to impacts on terrestrial ecology and the take-up of undeveloped rural land, it is acknowledged that the proposed development would result in major and moderate significant 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 regarded as unavoidable.
- b) In terms of landscape character and visual amenity, the photomontages submitted indicate that the development would constitute a major visual intrusion notwithstanding the mitigation measures incorporated during the design stage. 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.
- c) 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.
- d) The Waste Management Plan outlines the need for the centralisation of waste management facilities including the approved Waste to Energy and the approved Organic Processing Plant, the Material Recovery Facility (MRF) and the Thermal Treatment Facility (TTF). Cumulative

impacts are inevitable, both beneficial and adverse. The said impacts mainly include land take-up and excavation, landscape and visual amenity, light, noise and air emissions.

The proposal is aligned with the objectives of Malta's Waste Management Plan (2021–2030), addressing key priorities including the reduction of waste exports and the modernisation and centralisation of waste management infrastructure. While acknowledging the identified residual impacts, the ERA notes that alternative design options have been assessed and appropriate mitigation measures incorporated into the proposed development. The do-nothing scenario is not considered a viable alternative, as it would hinder the implementation of the Plan's objectives and Malta's efforts to improve waste management performance and reduce reliance on waste exports.

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

In view of the above considerations, the ERA does not object to this proposal, subject to the implementation of stringent 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.