

7. COMMENTS RECEIVED DURING THE EIA PROCESS

7.1 Comments received during the EIA scoping stage (25th March 2024 – 5th May 2024)

Ref No.	From	Comment
1.	Planning Authority (email dated 25/03/2024)	The Planning Authority awaits the outcome of the EIA assessment and the final comments and recommendation by ERA in order to proceed with the screening of PA 6096/23 (Proposed Thermal Treatment Facility in the ECOHIVE Complex, including plant building, storage building, administration building, waste water treatment, tank farm and cisterns).
2.	Light Pollution Awareness Group (email dated 25/03/2024)	Considering that this development can be a severe source of light pollution it is essential that the terms of reference contain a requirements for all the external lighting aspects of the project be properly studied and mitigated.
3.	Energy and Water Agency (email dated 09/04/2024)	The following are comments for The Energy and Water Agency divided by considerations which relate to specifically and solely to energy and water management. Energy: - With regards the consumption of diesel on site for the highlighted end-uses, it is being recommended that applicant considers the inclusion of biofuels in the diesel to reduce GHG emissions. - It is recommended that the applicant considers the installation of photovoltaic systems on the available roof space to offset some of their electricity consumption from the grid. Water: No comments
4.	Malta resources Authority (email dated 10/04/2024)	We do not have any comments from our end.
5.	Regulator for Energy & Water Services (email dated 19/04/2024)	The REWS does not have any input to be included in the Terms of Reference (TORs) for the EIA. However, as per the Project Description Statement Report dated 21 February 2024 by AIS Environment Ltd, the TTF shall include fuel storages which require authorisations under the subsidiary legislation falling under the REWS Act: - an emergency diesel generator will be installed on site for cases of power loss; - the plant will use fuel for start-up and to keep the temperature in the secondary combustion chamber; - a fuel storage for site vehicles will be required. For the fuel storages in (a) and (b) Wasteserv will require an authorisation from the Regulator to operate a Secondary Storage Facility of Petroleum while for the fuel storages in (c) Wasteserv will require an authorisation from the Regulator to Operate a Petroleum-Filling Station (Commercial Site). Wasteserv will be informed accordingly.
6.	Environmental Health / Department for Health Regulation (email dated 23/04/2024)	With reference to your e-mail dated 25th March 2024 regarding subject in caption and following review of the Project Description Statement, please be informed that Environmental Health Directorate would like to comment on the following public following issues related to public health included in the Terms of Reference for this proposed development: - Air pollution impact assessment, the necessary monitoring and mitigation measures are to be clearly stated for: - excavation, and construction, - emissions from heavy vehicles during the construction and operation phases, - emissions during the operational phase including odour pollution, - construction and operational traffic, These should include the effects on the surrounding areas. - Noise and vibration impacts assessment from construction, operational traffic and from other operational activities. Any required monitoring and mitigating measures must be clearly stated.

		3. Traffic Impact Study and Assessment on the consequence of this project on the area of influence. Mitigation measures are to be clearly stated. 4. Light pollution impact assessment including any mitigation measures. 5. A Waste Management Plan shall be implemented which should include the impacts from waste generated during the construction and operation phase. It is important that the Construction and Waste Management Plan is enforced and followed in detail by the site project manager. Any monitoring and feedback mechanisms must be clearly stated and adhered to. 6. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel, and lubricants. Necessary monitoring and mitigation measures are to be clearly stated and adhered to. 7. The overall cumulative impacts of the development on the public. 8. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence. 9. A hydrology assessment should be made carried out. Such assessment must include: • Details for the supply, distribution, and storage of potable water. • Details of collection, storage, overflow, and use of rainwater. • Impacts and mitigation measures on ground water and surface water in terms of water quality including run-off management. • Details of the proposed construction of reservoir/pits for grey water and wastewater and its use. • Risk of any water borne illness from the use of grey and wastewater during in the operation phase. 10. Details of proposed sanitary facilities for workers. 11. Details of Pest control management on site and the surroundings. The EIA shall consider the cumulative risks from other construction and operational activities that are envisaged to be carried out in the ECO-HIVE Complex and which may have other negative environmental health impacts especially if these activities are carried out in tandem. The EIA should also include a detailed description of the measures envisaged to prevent, minimise and where a possible, offset any significant temporary or permanent adverse health effects and nuisances on the Area of Influence and the general public. This should include details regarding monitoring programmes that may be proposed. Moreover, the EIA should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.
7.	Civil Protection Department (email dated 23/04/2024)	Kindly request declaration by the fire safety competent engineer confirming adherence and compliance with the fire safety standards please.
8.	Superintendence of Cultural Heritage (email dated 30/04/2024)	In response to your request, please find recommended Terms of Reference for a Cultural Heritage Assessment i.c.w. the Environmental Impact Assessment (EIA) related to the construction of a Thermal Treatment Facility. 1.0 Preamble The area proposed for development is within the ECOHIVE Complex located Outside Development Zone in the limits of Maghtab, Naxxar. The site in question lies 14m from the buffer zone intended to protect the Ta' Hammud Dolmens (Gov. no: 574/94) which have been granted a Class A level of protection due to recorded discoveries, including megalithic structures, Neolithic pottery, and prehistoric passageways. 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. 2.0 Scope and Definitions of the EIA For the purposes of this document, cultural heritage is defined by Article 2 of the Cultural Heritage Act (2002). This includes movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, palaeontological and geological importance. 2.1 The study area shall include the proposed area of development as well as the immediate environs. 2.2 In the context of this application, cultural heritage considerations may include:

- Features of archaeological value and potential;
- Military or civil architecture covering all historical periods;
- Vernacular structures;
- Field systems and agricultural features such as irrigation systems.

The Superintendence draws the attention to the following features as indicated in the map below and identified in the legend overleaf.



Figure 1:
Cultural Heritage Features in Close Proximity to the Development

Number	Name	Feature
1	Batterija tal-Ghallis	Battery
2	Torri ta' Qalet Marku	Tower
3	Fdalijiet mill-Batterija ta' Qalet Marku	Battery
4	Ir-Ridott ta' Qalet Marku	Redoubt
5	Ir-Ridott ta' Baħar iċ-Ċagħaq	Redoubt
6	Kappella ta' San Pietru Sajjied	Chapel
7	Knisja tal-Madonna tal-Angli	Church
8	Statwa ta' San Pawl	Statue
9	Trunciera f'tal-Madliena	Entrenchment
10	Knisja tal-Assunta	Church
11	Kappella ta' San Gwann Evangelista	Chapel
12	Batterija Ta' San Gwann	Battery
13	Batterija Tal-Għarghur Tal-Lemin	Searchlight Emplacement
14		Megalithic alignment
15		Megaliths
16</		

		b) Consultations with any relevant bodies, including the Superintendence of Cultural Heritage, Heritage Malta, the University of Malta, NGOs and Local Councils; c) Compilation of an inventory of the cultural heritage assets identified within the study area. The features of cultural heritage are to be described and plotted with grid references, on Data Capture Sheets, the design of which should be approved in advance by the Superintendence of Cultural Heritage. The Data Capture Sheets will be presented as an appendix to the EIA. The analysis of the features will be included in the main report; d) A cultural heritage Risk Assessment with map examining the various impacts of the proposed project. <u>The Cultural Heritage Impact Assessment shall also include:</u> 1. Description and assessment of the cultural heritage features in close proximity to the development; this chapter is to integrate information acquired during previous EIAs in the vicinity including EA/0019/22 conducted for the Construction of an Organic Processing Plant within the ECOHIVE Complex which included much of the site earmarked for the Thermal Treatment Facility. 2. Assessment and correlation of visual impact studies to assess the impact of the proposal on the surrounding cultural landscape. This section is to include photomontages captured from significant viewpoints, including but not limited to, Torri Qalet Marku, Ghallis Tower, the Salina Pans, Mdina and Selmun Tower. The Superintendence of Cultural Heritage <i>may</i> direct the author of the <u>Cultural Heritage Impact Assessment</u> to include the following methods prior to the commencement of the cultural heritage impact assessment: 1. Systematic fieldwalking; 2. Detailed investigation (non-intrusive and/or intrusive) of recently discovered potential megalithic remains; The Author of the cultural heritage impact assessment is to contact SCH prior to the compilation of this chapter for further guidance regarding the necessary studies to be conducted. SCH may be contacted on monitoring.sch@gov.mt copying kevin.borda@gov.mt. 4.0 Authorisation by the Superintendence of Cultural Heritage As per the Cultural Heritage Act 2002 (as amended) (CAP 445), any form of investigation or prospection required for the identification of cultural heritage (including excavation, field walking, topographic surveys, remote sensing and underwater surveys) may only be undertaken by the Superintendence of Cultural Heritage or with its written approval.
9.	BirdLife Malta (email dated 3/05/2024)	After analysing the 'Project Description Statement Report for Thermal Treatment Facility', BirdLife Malta would like to contribute to the consultation process with the following comments. Whilst appreciating and agreeing with the environmental impacts and mitigation measures stated, we would like to put more emphasis on the projected impacts below. Comparison of Best Available Technology It is expected that the biggest impact of the incineration activity will be through aerial emissions, with a major adverse impact rather than the stated moderate adverse impact. These may include flue gas, metaloxides, nitrogen oxides and sulphur oxides which might have significant ecological and socio-economic implications on areas present in the windward direction^{1,2}. A comparison of the best available abatement technologies for emissions should be presented, providing reasons for the technology selected. For example, in the project description statement, the abatement technology stated for NOx is through Selective Non-Catalytic Reduction (SNCR). However other technologies such as the Selective Catalytic Reduction (SCR) have been reported to have a higher efficiency in NOx removal but with a higher operational cost^{3,4}. Environmental and Socio-Economic Baseline Data Using an air dispersion model, it's crucial to identify potential receptor sites for aerial pollution in both terrestrial and marine environments, along with their associated impacts and mitigation strategies. These sites may range from the facility's vicinity to areas several kilometers or hundreds of meters away. To ensure accuracy, the study area should be defined based on these receptor sites, and the most recent baseline data should be obtained: • Assessment of both flora and fauna. Particular attention should be given to the following sites found in proximity: ○ L-Għadira s-Safra u l-Iskoll tal-Ghallis (MT0000008) one of the two localities for the locally endangered Prickle Grass (<i>Crypsis aculeata</i>, which is listed in the National Red Data Book as endangered). This wetland also supports the rare Tadpole Shrimp (<i>Triops cancriformis</i>, listed in the National Red Data Book), and the Fairy Shrimp (<i>Branchipus schaefferi</i>), having a restricted distribution in the Maltese Islands. ○ Qalet Marku, the only known locality for the Sea Couch (<i>Elymus pycnanthus</i>), an endangered grass which has a restricted distribution in the Maltese Islands. ○ Marine ecology of Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u il-Qaliet (MT0000105 -Special Area of Conservation) and Żona fil-Baħar ta' madwar Għawdex (MT0000112 -Special Protected Area). • Socio-economic land uses within the receptor sites must be clearly identified which might include bathing areas along Tul il-Kosta (coast road)

	- Air, soil, and water quality. Given that the area is already affected by the old waste disposal site of Magħtab, the current level of pollutants in the soil, water and coastal areas should be determined. Environmental Impacts and Mitigation Measures Construction Phase - The site encompasses 18,185m² of land within a rural/ODZ area, designated as a Listed Ecological Area/Site. This will significantly impact land use, yet mitigation measures are not specified in the project description. It's recommended to evaluate the site footprint and propose methods to minimize, avoid, or compensate for the land use impact. Restoration of disturbed land in the vicinity should be considered as a compensatory measure. - 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. - During construction, minimizing light pollution is crucial due to its adverse environmental effects, such as bird disorientation and grounding. No extra light spillage is permissible along the coast and near Natura 2000 sites (MT0000007, MT0000008, MT0000105, MT0000112), considering the existing heavy light pollution in the Magħtab 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 recommended^{5,6}. - During construction, noise and vibration will affect nearby residents, particularly those within the 100m buffer zone. This may temporarily disrupt residents' quality of life. Developers should explore off-site mitigation options, such as installing enhanced window glazing for affected residents⁷. Operation Phase - A comprehensive air dispersion model is required to assess the potential impact of emissions from the proposed incinerator on ambient air quality. We suggest expanding the buffer zone to account for the extent of aerial pollution rather than the standard 100 meters. This is anticipated to have a detrimental effect on the quality of life for residents near the proposed site⁸. - The released particulate matter can settle on land and water, impacting soil and surface water quality, as well as groundwater. This may lead to bioaccumulation in plant species. Given that the proposed scheme is within an Agricultural Value area, it's crucial to consider this impact, particularly since it's generally advised to avoid growing food near incinerators⁹. - It is recommended to implement a comprehensive environmental monitoring and reporting plan throughout the operational phase. This plan should include regular testing, with specified frequency, for traces of pollutants, focusing on: - Natura 2000 sites - Crops, soil and groundwater falling within receptor sites - Indirect impacts on nearby Natura 2000 sites should be clearly stated, their significance, extent and whether they are long-term or short-term, reversible, or irreversible. - Light pollution during the operation phases is to be assessed, particularly by evaluating the external lighting scheme. No additional light spill is acceptable on the coast and in the vicinity of Natura
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7.2 Comments received during the EIA Review (9th March 2025 – 9th April 2025)

7.2.1 Consultees’ comments on the EIA Report

A. Superintendence of Cultural Heritage (email dated 01/04/2025)

Comments	Reply
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</i> and <i>Landscape Character & Visual Assessment in Relation to the Environmental Impact Assessment (EIA) for a new Thermal Treatment Facility (TTF)</i>. Proposal The project involves the construction of a new Thermal Treatment Facility (TTF) at the ECOHIVE complex at Maghtab in the limits of Naxxar. The proposed facility features several ancillary buildings including a water treatment facility, offices, sanitary facilities, laundry services, kitchen, various administrative spaces, access control points, and a substation. Cultural Heritage Context The site in question lies 14m from the buffer zone intended to protect the Ta’ Hammut Dolmens (Gov. no: 574/94) which have been granted a Class A level of protection due to recorded discoveries, including megalithic structures, Neolithic pottery, and prehistoric passageways. 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. Terms of Reference The Superintendence notes that it had sent detailed Terms of Reference (TORs) to ERA in April 2024. These TORs were intended to guide the Cultural Heritage Impact Assessment to be prepared in relation to the Environmental Impact Assessment (EIA) required to evaluate the proposed construction of a TTF within the Ecohive Complex. These TORs had indicated specific vantage points to be included in the Landscape and Visual Impact Assessment including Torri Qalet Marku, Ghallis Tower, the Salina Pans, Mdina and Selmun Tower. The TORs had also included a map and associated legend, reproduced below, indicating the known cultural heritage features within close proximity to the site of the development.	Noted. The Landscape Character and Visual Assessment was conducted in accordance with the Terms of Reference issued by ERA, based on method statements approved by ERA, which also included the list of assessment viewpoints. Additional photomontages requested will be sent directly to the SCH. These will not be included in the EIA report.

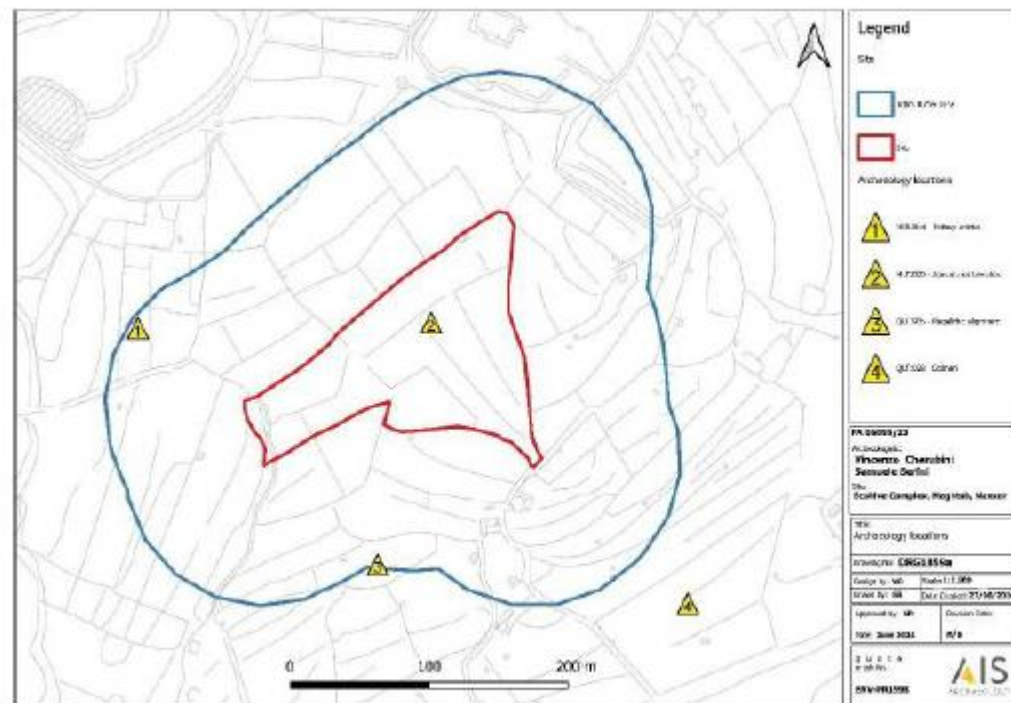


Figure 3: Location of Listed Archaeological Sites within AOI

The report also identifies the presence of a vernacular building in the northern part of the site. The Superintendence agrees with the report's conclusion that in view of its dilapidated state its removal may be considered.

A dry-stone hut (*girna*) was also identified to the west of the site. The Superintendence agrees with the conclusion that since the structure located within the AOI is still well preserved, it should be considered a subject of architectural, cultural and ethnic value worthy of preservation. The Superintendence further recommends the implementation of specific measures to safeguard it during works.

The report also draws attention to the Class A scheduled Ta' Hammud megalithic dolmens, highlighting its location approximately 140m from the S-East limit of the site, and 40m towards SE from the limits of the AOI buffer zone. However, no assessment of any potential impact on this site is included. This aspect of the report is to be revised to include analysis of any impact as well as potential mitigation measures.

Furthermore, the report refers to the archaeological evaluation carried out on site by the Superintendence which identified over 1,100 features largely consisting of agricultural trenches and other features relating to agriculture. The Superintendence agrees with the report's conclusion that since archaeological features have already been identified and recorded on site, no further archaeological investigation will be required. The Superintendence also endorses the recommendation that any eventual works are to be subject to archaeological monitoring.

Report on Landscape Character & Visual Assessment in Relation to the Environmental Impact Assessment (



Figure 4 – View along Triq ir-Ramla to be included

These viewpoints are therefore to be included in a revised Landscape and Visual Impact Assessment.

Nevertheless, the Superintendence notes and endorses the EIA’s conclusion that the TTF cannot be assessed in isolation and must be viewed 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 Organic Processing Plant (OPP) which is awaiting decision.

When viewed in conjunction with these projects, the Superintendence accepts the report’s main premise that although the TTF occupies a prominent position and covers a large area, it is less impactful than the other waste management facilities earmarked for the area.

Nevertheless, for the visual impact of the proposal to be fully assessed, the specific vantage points as requested at TOR stage are to be included in a revised study.

Design, Massing and Mitigation

The Superintendence takes cognisance of the report’s conclusion that efforts to reduce the visual impact of the proposal have been implemented. These include the partial excavation of the site, layering and sectioning of the buildings, soft landscaping, and recessing large tanks into the ground.

Nevertheless, any further mitigation in terms of design and massing as may be possible would be favourably considered from a cultural heritage perspective.

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 impact on the cultural heritage features identified at TOR stage as well as the specific vantage points have limited the scope and effectiveness of the EIA.

The Superintendence therefore recommends that the sections on cultural heritage and the Landscape and Visual Impact Assessment are updated paying due cogn

B. Environmental Health Department for Health Regulation (email dated [04/04/2025])

<u>Comments</u>	<u>Reply</u>
With reference to Environmental Impact Assessment dated March 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 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 phase have to be in good working condition 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 Legionaries 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. The EHD is also concerned with the possibility of odour pollution during the operation phase of this project hence it is necessary that preventive measures and monitoring	

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. 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 collected from the roads shall pass through an oil/water separator prior reaching the reservoir. Rainwater reservoirs shall not be connected to the drainage system. The wastewater treatment plant is to be registered with the Superintend of Public Health. At no time the treated water from the Wastewater Treatment plant is to be used for human consumption. The reuse of treated water is to be in line with any National and European laws and regulations. It shall also be ensured that this treated water is not a source of ill-health to employees and general public. The measures for the Control of Legionella as per LN 5 of 2006 are to be implemented. These measures include the testing of legionella from any process that may generate aerosols and have an impact on the workers and general public. 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 to 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 in any 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 and these shall take into consideration and 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
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Water:

- No comments

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7.2.2 Comments received from the public

	Comments	Reply
Individual 1 (email dated 09/04/2025)	I hope this email finds you well. I am referring to the plans of putting all incinerators near our homes. Naxxar is already polluted with fumes coming from the Bitmac plant, traffic, over development and quarry dust. Burning all waste in the area will further lower the air quality in the area. Thus, I beg you to reconsider and put our lives and that of our children in serious consideration. Most of us are already suffer with respiratory problems.	It is important to note that environmental protection, particularly air quality, has been prioritized throughout the project. The facility will be equipped with state-of-the-art flue gas treatment technologies to ensure minimal environmental impact. A Dry FGT system, consisting of absorbent sodium bicarbonate, activated carbon, and filter systems, will be in operation. In addition to this, a Wet Scrubber has been incorporated to provide an additional layer of treatment, ensuring further reduction of emissions. These measures are in line with industry best practices. Furthermore, 24/7 online air quality monitoring will be implemented, and in the event of any exceedance of limits, the facility will automatically shut down the waste feeding to prevent adverse effects. Air Quality Study has been conducted in compliance with the Terms of Reference provided by the Environment and Resources Authority (ERA). These Terms require that the air quality model considers an "Area of Influence" of not less than 113 km² within a 6 km radius around the proposed facility (TTF). This Area of Influence serves as the geographic basis for the model, allowing the study to assess and evaluate the effect of the plant on both human and environmental receptors located within this area including residential areas, schools, and hospitals, according to the model, the cumulative air pollutant impacts are negligible throughout the Area of Influence, except for a minor impact on PM10 levels at one receptor located in Maghtab (Ref. R27 in the study). In conclusion, all necessary measures have been carefully designed to safeguard both the environment and public health.
Individual 2 (email dated 09/04/2025)	Dear evaluation committee, Thank you for the opportunity to comment: Reference is made to W2E report Online.pdf https://era.org.mt/wp-content/uploads/2020/02/W2E_report_Online.pdf 1. Technical report waste-to energy in malta, scenarios for implementation, june 2008 Umweltbundesamt also conducted a site selection exercise, evaluating five potential sites against a number of criteria: Infrastructure, Transport, Location, Environment, Knock-out criteria. The sites considered were Marsa, Xewkija, Delimara, Maghtab and Hal Far. The Delimara site was chosen as the most favourable with the Maghtab site ranking second. In their conclusions, Umweltbundesamt stated that “the stage of planning is	

The reasons for delimara not taken forward has not been provided in https://era.org.mt/wp-content/uploads/2020/02/W2E_report_Online.pdf 2. The SLR study SLR's scope of project delivery was primarily to prepare a Project Description Statement (PDS) for the development of the proposed WtE facility. Equinox and AIS Environment assisted SLR in the Cost Benefit Analysis Importantly SLR study task 4 is relevant: Task 4: Alternative Site Assessment “One of the studies comprising the SLR full report, Options Analysis and Feasibility Study-Report (Task 3) included a site identification exercise, a technical feasibility and environmental sustainability study and an evaluation of various advanced thermal treatment technologies. In their site identification exercise 8 sites were considered. In this exercise, SLR added a number of other sites to those previously considered by Umweltbundesamt. The cooling requirement of a Waste to Energy facility implies that the facility needs to be located near the coastline. The SLR Consultants considered that Hal Far and Luqa are not close to the coast and thus these sites do not facilitate cooling. The Marsa site was considered as not of sufficient size, with heavy surrounding traffic. The site identification exercise thus ruled out these sites. SLR concluded that two sites at Magtab were appropriate locations for a WtE facility. After weighing the different technologies available and the appropriateness of these technologies for the particular waste that would be fed to the facility, and after considering the objectives given by MSDEC to SLR, moving grate technology was chosen as the most appropriate for Malta” Reasons why the delimara plant has been ruled out are not given, furthermore, as the minister of finance stated recently that Malta's population is reducing in numbers Urgent, drastic action needed to reverse Malta's low birth rate, minister says https://timesofmalta.com/article/urgent-drastic-action-needed-reverse-malta-low-birth-rate.1105081?utm_medium=Social&utm_source=Facebook&fbclid=IwY2xjawJjGsRleHRuA2FlbQlXMQABHjyPrSTa8SoQoIm9BFjBH0z6xBrBOEa9y8Xy2fd6rDJXYuobu6PaGsANTP6g_aem_3X225rZmK1P2o2URhe0avA#Echobox=1739386847

	Furthermore what provisions for the safety of workers handling dust ash have been made in this process ? since it is not explicitly evident that the Environmental Health / Department for Health Regulation concerns have been all considered. With respect to Solid Residues, Ash and Sludge: <u>contain</u> heavy metals and other hazardous materials. The details of the strategy for careful management and disposal to prevent soil and water contamination have not been provided by the EIA.	
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Mr. Zammit Cutajar outlined that the siting of an industrial project within a residential area. He noted that Scotland has banned incinerators and Malta is going to spend 600 million on this project, when even the EU Commission has issued a recommendation against incinerators.

Richard Bilocca (WasteServ CEO)

Mr. Bilocca commented about the system of online monitoring that will be implemented for the ECOHIVE complex. He confirmed that readings from this system will be published on the ERA website for public access and transparency. He also mentioned that the system is designed with dual redundancy, ensuring a backup in case of any faults. He explained that the ECOHIVE complex aims to reduce reliance on landfills, noting that certain waste can no longer be taken to landfills due to regulatory constraints. Mr. Bilocca clarified that AIS serves as an independent consultant, separate from both ERA and Wasteserv. He concluded by stating that the plants are designed to stop operating automatically if something goes wrong, ensuring safety and operational reliability.

Member of the public

A resident expressed serious concerns about emissions from the incinerator, stating that even if 1 ppm is emitted from the chimney, it is already unacceptable. The resident emphasised that no ppm should be emitted under any circumstances, as this presents a significant health and safety issue, and also pointed out that wind will carry the ppm, potentially spreading harmful emissions to surrounding areas. The resident concluded by stating that the incinerator is not a viable solution to the waste management problem.

John Azzopardi

Mr. Azzopardi enquired whether the reading sensors will be made available to the public for transparency. He asked whether energy efficiency measures are being taken into consideration as part of the project's design and operation. Additionally, he suggested that charging for waste generated could be a useful strategy to encourage waste reduction and promote more sustainable behaviour. Mr. Azzopardi commented on the re-use of excavated material.

Conclusion of the meeting

Mr. Camilleri closed the meeting by confirming that the points raised have been noted. He thanked the participants and invited them to send any further comments, preferably by email to eia.malta@era.org.mt, or by post to 'The Director, Environment and Resources Authority, Hexagon House, Spencer Hill, Marsa', by not later than 28th May 2025.

7.2.4 Comments received from the public following the public hearing (23rd April 2025 - onwards)

	Individual	Comment received	EIA Coordinator Response
1.	Individual 1	Dear Sir/EA Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I hereby declare that I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless to the extent that plants are being assessed on an individual basis. To come to anywhere close to the correct conclusion, one has to assess these plants cumulatively i.e. all together.	The EIA has considered the cumulative impact of other developments at the ECOHIVE complex in Maghtab. For example, the air quality study considered the cumulative impact of both Waste to Energy and Thermal Treatment Facility operating simultaneously. Similarly, the visual impact of the Waste to Energy, Thermal Treatment Facility, Organic Processing Plant and Materials Recovery facilities proposed at the ECOHIVE complex were also assessed and clearly explained during the public hearing and the published EIA reports. The Environmental Impact Assessment was carried out as a coordinated and comprehensive study in full compliance with EU legislation. The assessment began with a baseline assessment of the current environmental conditions and took into consideration other major projects at Maghtab, such as the Waste-to-Energy Plant, the Organic Processing Plant, and the Material Recovery Facility. It also evaluated cumulative impacts, such as combined air emissions, and was aligned with the principles of EU Directive on the assessment of the effects of certain public and private projects on the environment (Directive 2011/92/EU), which explicitly prohibits fragmented assessments. Section 2.3.3, "Other planning developments in the area" of the Coordinated Assessment refers to proposed projects under the ECOHIVE project, namely the waste-to-energy project, the organic processing plant, and the Material Recovery Facility. It also considers Enemalta's new electricity interconnector (IC2).
2.	Individual 2	Good Afternoon, Following last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), I would like to express my opposition against the proposed construction of the Thermal Treatment Facility in Maghtab. Being a resident of Naxxar, my main concern is that the impact assessment carried out considered only the effects of a single incinerator, without accounting for the cumulative impact of all projects in the area, making the assessment inadequate.	Refer to response provided to Individual 1.
3.	Individual 3	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maght	

			manage the unavoidable and unrecyclable waste stream and are fully supportive of the upper tiers of the waste hierarchy. Key environmental benefits include: ○ Replacing an outdated facility with one that incorporates Best Available Technology (BAT), including advanced filtration systems and real-time emission monitoring. ○ Treating unavoidable hazardous waste locally, reducing reliance on waste exports and associated emissions. ○ Complying with the EU Waste Hierarchy by managing waste that cannot be reduced, reused, or recycled. ○ Supporting Malta’s Long Term Waste Management Plan 2021-2030, (2021–2030) ○ Achieving emission levels well below EU thresholds, as verified by the independent Environmental Impact Assessment Regarding the Air Quality Scenarios, the scenarios are clearly explained in the Introduction Chapter of the Air Quality Study. These consider scenarios with different throughputs of waste and also an abnormal scenario. Kindly refer to the Air Quality Study (Standalone technical study) which provides a detailed overview of the baseline studies conducted and the empirical and scientific models which have been used to predict the air quality impacts for each scenario. The proposed TTF will operate within the limit values stipulated by EU Directives. Monitoring of emissions is also suggested in the EIA reports provided. These will be in line with IPPC permit requirements. In the event of system breakdowns, malfunctions or exceedances of emission limit values, the plant would initiate a shutdown procedure. Such events are investigated and reported to the ERA. Possible odours from waste will be controlled thanks to various odour abatement systems, which include storing waste in enclosed refrigerated areas, negative pressure systems inside buildings, air curtains and other systems of ventilation control. Odour emissions are also regulated through the IPPC permitting process and monitored throughout the operational lifetime of such facilities. All EIA reports submitted by the EIA coordinator are reviewed by the ERA which regulates the EIA procedure.
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7.	Individual 7	Project reference: Proposed thermal treatment facility (TTF) at ECOHIVE, Maghtab PA no: PA/06096/23 EA/00020/22 Please note my objection to the above mentioned project.	
8.	Individual 8	Project reference: Proposed thermal treatment facility (TTF) at ECOHIVE, Maghtab PA no: PA/06096/23 EA/00020/22 Please note my objection to the above mentioned project.	
9.	Individual 9	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

10.	Individual 10	I object to this If you are concerned about all the waste treatment facilities being relocated to Maghtab, and the resulting air quality issues in Gharghur, today is the LAST day to voice your concern. Writing will ensure you are kept posted on developments too, and invited to the hearing, which is your right. Write: To eia.malta@era.org.mt Cc representations@pa.org.mt Re PA/06096/23 (EA/00020/22) Thermal Treatment Facility Object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
11.	Individual 11	To whom it might concern, As a family of four residing at San Pawl tat- Targa we wish to object to the incinerator/ new thermal treatment facility at ECOHIVE Complex at Maghtab especially when this installation is moving forward without a cumulative impact assessment that quantifies the effects on our health. Other more sustainable waste management alternatives should be considered that do not produce pollutants that harm our health and the environment.	Refer to response provided to Individual 1.

12.	Individual 12	Dear Sir/Madam As a Naxxar resident I am writing to express my absolute outrage at the proposal to build a Thermal Treatment Facility in Malta. My objection is based on the fact that a proper Cumulative Impact Assessment of all plants and facilities has not been carried out. This proposal is not only reckless, it is a direct insult to the people who live here and care about this island's future. The very idea is obscene. Are we to sacrifice our health for the sake of short-term convenience? The damage to our air, land, and sea would be irreversible due to an outdated, lazy approach that will trap us in a cycle of pollution for decades. In the strongest possible terms, I demand that you cancel this insane proposal immediately. This island deserves better. Our future deserves better. Enough is enough.	A cumulative assessment has been carried out, please refer to response provided to Individual 1.
13.	Individual 13	Dear Sir/Madam, Further to ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
14.	Individual 14	Dear Sir/Madam Further to last Wednesday's ERA meeting re subject in caption, as a resident of Naxxar, I hereby declare my opposition to the proposed Thermal Treatment Facility together with any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless as plants are being assessed on an individual basis. To come anywhere close to the correct conclusion, a cumulative assessment of all the plants must be carried out. I sincerely hope our pleas do not fall on deaf ears as this will surely impact negatively on our way of life.	Refer to response provided to Individual 1.
15.	Individual 15	TO WHOM IT MAY CONCERN Reference is being made to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22). As a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

16.	Individual 16	TO WHOM IT MAY CONCERN Reference is being made to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22). As a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER	Refer to response provided to Individual 1.
17.	Individual 17	Dear Sir/Madam As a resident of Naxxar I hereby declare that I am totally against the construction of the proposed thermal treatment facility and any other waste incineration plant at Eco Hive Complex in Maghtab. The main reason for my decision is that a Cumulative Assessment of all the plants together was not carried out. This would indicate the real extent of the impact on the environment and our lives.	Refer to response provided to Individual 1.
18.	Individual 18	Hi, I would like to object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
19.	Individual 19	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours group I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

	B’rabta mar-riskji ta’ overload, fid-dokumentazzjoni mressqa u fil-laqgħa li saret għar-residenti għadu mhux ċar kif l-awtoritajiet ser jimmonitorjaw u jiehdu sampling regolari tal-emissjonijiet tad-dijossina. Id-dijossina fl-arja tista’ tkun partikolarment ta’ ħsara għar-residenti esposti għall-effett tal-inċineratur u r-riskju ta’ emissjoni akbar ta dijossina jiżdied jekk ikun hemm load akbar u jkun hemm dak li jgħidulu ‘incomplete pyrolysis’ minħabba li l-inċineratur ikun mgħobbi ħafna u allura jibda jipproduċi emissjonijiet akbar minn dawk previsit fil-kriterji tekniċi tiegħu. Nistaqsi kif l-awtoritajiet kompetenti qed jippjanaw li jipprevjenu, jimmanigġjaw u jevitaw dan ir-riskju hawn imsemmi. Nirringrazzjakom tal-attenzjoni u f’ isem ir-residenti nistenna risposti dettaljati bil-miktub skont kif l-awtoritajiet konċernati huma obbligati fil-Konvenzjoni ta’ Aarhus u l-liġijiet li jimplimentawa fil-livell Ewropew u nazzjonali. Il-Konvenzjoni Aarhus tiggarantixxi d-dritt ta' kull Ewropew u allura kull Malti li jgħix f'ambjent tajjeb għal saħħtu. Dan billi tagħti dritt dirett liċ-ċittadini li jitlob l-informazzjoni sħiħa dwar kull deċiżjoni li jista' jkollha impatt fuq saħħtu. Il-Konvenzjoni tiggarantixxi wkoll id-dritt tal-parteciċpazzjoni pubblika fid-deċiżjonijiet kif ukoll tal-aċċess għall-gustizzja fuq kull deċiżjoni li taffetwa saħhitna f'Malta. Il-Konvenzjoni giet iffirmata mill-Gvern Malti fl-1998 u daħlet ukoll bħala liġi tal-Unjoni Ewropea permezz ta 4 direttivi differenti fl-2003.	
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		5. Also, if there is medical waste and bio waste, why not consider discarding such bio waste with the approved crematorium 6. Furthermore, the prevailing wind is NE	
25.	Individual 25	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people's homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents' quality of life and property values, as well as on Malta's reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	The air quality impacts of the proposed incinerator have been studied not only at the nearby homes, but within a 113km² area around the chimney stack. The results obtained from the models have clearly shown that the EU threshold limits on air quality will not be exceeded at any location within the 113km² area. The TTF is being proposed to treat certain waste streams generated in Malta that cannot be reused, recycled or recovered. Other facilities have been planned and put forward by Wasteserv Malta to better manage waste recycling and reduction. These include the Materials Recovery Facility (MRF) and the Organic Processing Plant (OPP) that shall be handling waste from the grey/green bags, i-bins, civiv amenity sites, organic bags etc. Regarding sustainable wasta management, kindly refer to response provided to Individual 6.
26.	Individual 26	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

27.	Individual 27	Dear Sir/EA, Following last Wednesday's ERA consultation meeting regarding application PA/06096/23 (EA/00020/22), I am writing as a concerned resident of Naxxar to express my strong objection to the proposed construction of the Thermal Treatment Facility and any similar waste incineration plants at Maghtab. My main concern lies in the inadequacy of the current impact assessment, which evaluates projects in isolation. For a meaningful and accurate assessment, all related plants must be considered cumulatively, rather than individually. Only through such a comprehensive evaluation can the full environmental and public health implications be properly understood.	Refer to response provided to Individual 1.
28.	Individual 28	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people's homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents' quality of life and property values, as well as on Malta's reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	Refer to response provided to Individual 25.
29.	Individual 29	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people's homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents' quality of life and property values, as well as on Malta's reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents.	Refer to response provided to Individual 25.

		Thank you for your attention to this important matter.	
30.	Individual 30	1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. 4. Residents of Naxxar , Gharghur and Iklin are already suffering because of the bitmat factory , a site with a large amount of infringements and letting off poisonous gasses . Being sandwiched between two projects like this will results in a huge increase in. It only smells but citizens falling ill . The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
31.	Individual 31	Dear MEP & ERA, I am writing to strongly oppose the construction of a waste incinerator at Maghtab waste facility Malta. Incineration is a harmful, outdated solution that the European Union has explicitly moved away from by cutting funding due to its severe health and environmental risks. I would like to raise my concern and plead that you consider the following points for a proper and thorough investigation prior to any decisions. 1. EU Policy: Incinerators No Longer Funded The EU's Circular Economy Action Plan and Cohesion Policy prioritize waste prevention, reuse, and recycling—not incineration. Since 2021, EU funds have been redirected from waste-to-energy plants to avoid "locking in" pollution-heavy	Kindly note our replies hereunder: 1. TTF does not contradict the EU approach or waste hierarchy. Rather, it fulfills a necessary role in managing residual hazardous waste streams that cannot be prevented, reused or recycled. At EU level, disposal of waste through incineration is considered as the last necessary step in the waste hierarchy of priority actions to manage waste. More specifically, incineration with energy recovery (as proposed in the Waste-to-Energy facility) is defined as a Recovery operation, whilst incineration without energy recovery (as proposed in the Thermal Treatment facility) is defined as a Disposal operation. Landfilling is also classified as a disposal operation and is highly not recommended. Disposal is a necessary step once all other steps in the waste hierarchy are not possible.

			control technologies in compliance with Best Available Technology (BAT) and the Industrial Emissions Directive (2010/75/EU). Importantly, TTF does not reflect a diminished commitment to sustainable waste management . On the contrary, this facility is designed to responsibly manage the unavoidable, unrecyclable and hazardous waste stream and are fully supportive of the upper tiers of the waste hierarchy. Additionally: - 1069/2009 Animal By-Products Regulation - o Regulation Article 12,13,14 allows for the incineration of Category 1, 2, and 3 materials. - 2010/75/EU – Industrial Emissions Directive - o The TTF is designed to comply with Emission limit values (ELVs) and Best Available Techniques (BAT) requirements under the relevant BAT Reference Documents (BREFs). It is important to note that the EU continues to view waste incineration as a necessary final option within the waste hierarchy. This approach is reflected in the adoption of more stringent environmental standards for new waste incineration facilities across Europe. The new TTIF has been designed to align with these BAT requirements. 2. Kindly refer to the response provided to Individual 6 regarding air quality health concerns and the area of influence of the study. 3. Announced in 2020, the ECOHIVE Project represents the largest investment ever made in Malta’s waste management sector. It marks a transformative step forward, not only in waste management but also in enhancing the country’s overall environmental performance and achieving its waste management targets. With an investment of €500 million, the project is enabling Malta to shift from a longstanding dependence on landfilling towards a circular economy, where waste is viewed as a resource. The results will be measurable, visible, and essential for Malta’s future. For a comprehensive overview of ECOHIVE’s scope and sustainability strategy, please refer to the response provided to Individual 6, which highlights how the strategy prioritizes waste prevention, maximizes material recovery and ensures the safe treatment of unavoidable and non-recyclable hazardous waste through the application of Best Available Techniques (BAT) in full compliance with EU regulations. 4. The EU still supports waste incineration as a last resort option in the waste hierarchy. Kindly refer to the publication of stricter EU environmental standards for the waste incineration sector. These standards set the conditions for new incineration installations across Europe.
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		The Local Council submits that the locality of Ghaghur is immediately adjacent to the proposed site, and such emissions would immediately expose and negatively affect the residents. Furthermore, due to the enormous size of the proposed development, approximately 18,200 sq.m., the probability of such emissions to impact Gharghur are notably higher. Importantly, reference is made to the fact that from the publicly available documents, it appears that no authority has commissioned and conducted a test or study to assess the potential impact of the proposed development on Hal Gharghur. This fact alone is a solid ground for the Local Council to object, as its interests and potential risks have not been factored in by the responsible authorities. The Local Council questions as to why studies were conducted in surrounding locations, Gharghur was omitted from the air quality monitoring exercise. 3. Insufficient Public Consultation with Hal Gharghur Local Council The Local Council hereby submits that it expresses its concern, as well as the concerns of the residents it represents, about inadequate communication and involvement in the decision-making process. The Local Council feels aggrieved at the fact that no effective consultation was made with it by the responsible authorities, when such consultation is essential to ensure that the community voices are heard - especially when such a long-term project can potentially have health and environmental risks. The Local Council submits that the location of the proposed site is a concern to it. The Local Council feels that the site selection proceeds may not have adequately considered alternative locations or fully assessed the suitability of the site, especially given that part of the site lies outside the designated waste management area. 4. Impact on Agricultural Lands and Local Livelihoods The Local Council further submits that due to the emissions which are brought about from such proposed development, these will negatively impact the agricultural fields in the surrounding areas. The Local Council expresses its concerns that such fields, and its produce, may be negatively impacted from such emissions. The Local Council hereby states that the size of the proposed development alone will disrupt the environmental surroundings of the agricultural lands. In conclusion, and light of the above given concerns, the Local Council owes a duty of care to its residents and objects to the proposed development. After careful consideration, the Local Council submits the above and advocates for a comprehensive review of the proposed project, ensuring that environmental, health and community impacts are thoroughly assessed and that alternative waste management strategies are considered. We trust that the Local Council's objections will be considered.	
34.	Individual 34	Dear sirs, We would like to register our disagreement re the Incinerators Project at Maghtab on the basis that a CUMULATIVE ASSESSMENT of ALL the plants has not been carried out. If this project goes ahead , it will undoubtedly seriously impact the Quality of our Environment and consequently , also the Quality of our Health and Lives . We sincerely hope that such Vital factors are taken into consideration.	Refer to response provided to Individual 1.
35.	Individual 35	Good morning, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Naxxar and a member of the Naxxar Neighbours Group, I am totally against the construction of the proposed Thermal Treatment Facility and any other waste incineration plants at	

		I trust you appreciate our predicament.	
36.	Individual 36	To whom it may concern, I am a resident of Gharghur (Triq Fra Duminku Mifsud). I object to this project due to the impact it will have on the health of residents in the area, including Gharghur. I am not satisfied with the assessment that has been carried out. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. I am particularly concerned about the concentration of such sites, and thus their emissions, so close to localities where people reside which will surely increase the risk of exposure and thus impact on their health and wellbeing. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
37.	Individual 37	To whom it may concern, I am writing to formally object to the planning application PA/06096/23 (EA/0020/22), which proposes the construction and operation of an incinerator at Maghtab. I am a local resident and therefore have serious concerns about the significant and long-lasting impact this development would have on our community. My main points for objection are: 1. Public Health Risks 2. Environmental Impact 3. Waste Hierarchy & Sustainability. 4. Traffic and Safety Concerns 5. Visual and Amenity Impact I urge the planning authority to reject this application in the interest of public health, environmental protection, and community well-being. Thank you for considering my objection.	1,2,3. Refer to response provided to Individual 6 4. Refer to response provided to Individual 59 5.The visual impact of the proposed TTF has been evaluated in the EIA and mitigation measures have been identified accordingly. These include a facility design that incorporates soft landscaping, a relatively short stack, and the use of subdued, earth-toned colours to help the structure blend into its surroundings. The building is also visually segmented to enhance integration with the existing landscape. To further minimise visual disturbance, low-pollution lighting will be used, including strategically placed external lighting systems with shielded, downward-facing fixtures to reduce residual light spill. The visual impact assessment were also presented during the public hearing.

		The facility will process hazardous waste streams such as carcasses, clinical waste, waste oils, abattoir by-products, and industrial chemicals. This raises grave concerns regarding its potential effects on public health, environmental sustainability, and the well-being of nearby villages and populated areas. Key Concerns: 1. Toxic Emissions: Hazardous waste incinerators release highly dangerous pollutants, including dioxins, furans, polychlorinated biphenyls (PCBs), and heavy metals (e.g., lead, cadmium, mercury). 2. Public Health Risks: Scientific evidence links exposure to these pollutants with cancer development, endocrine system disruptions, neurotoxicity, and respiratory illnesses such as asthma and chronic obstructive pulmonary disease (COPD). 3. Soil Contamination: Airborne toxins deposit onto agricultural soil, reducing its fertility and contaminating local crops, which may enter the food chain. 4. Water Pollution: Persistent organic pollutants (POPs) and heavy metals can leach into groundwater or run off into surface waters, compromising essential water resources. 5. Bioaccumulation in Food Chain: Contaminants from soil and water are absorbed by crops and livestock, intensifying toxicity levels in meat, milk, and eggs consumed by humans. 6. Persistent Environmental Pollutants: Dioxins and heavy metals are long-lasting, remaining harmful for decades and causing ecological damage. 7. Economic Threat to Agriculture: Contamination may render nearby produce unsafe for consumption with its inherent complications to people. 8. Irreversible Damage: Chronic exposure and pollution could lead to generational health issues, biodiversity loss, and irreparable harm to natural resources. For these reasons, I urge the rejection of this application to protect public health, the environment, and Malta's agricultural and economic stability.	
42.	Individual 42	Subject: Objection to Application PA/06096/23 (EA/00020/22) for New Thermal Plant Reference is made to the above application proposing the construction of a thermal plant. I strongly oppose the approval of this application for the following reasons: 1. Lack of Comprehensive Environmental Impact Assessment (EIA): The application appears to lack a holistic EIA, including cumulative impact analysis. 2. No Proper Evaluation of Alternative Locations: There seems to be no robust assessment of alternative sites beyond Maghtab. 3. Absence of Social Impact Assessment: No clear evaluation of the social consequences of the proposed facility has been provided. The facility will process hazardous waste streams such as carcasses, clinical waste, waste oils, abattoir by-products, and industrial chemicals. This raises grave concerns regarding its potential effects on public health, environmental sustainability, and the well-being of nearby villages and populated areas. Key Concerns:	Refer to response provided to Individual 41.

		1. Toxic Emissions: Hazardous waste incinerators release highly dangerous pollutants, including dioxins, furans, polychlorinated biphenyls (PCBs), and heavy metals (e.g., lead, cadmium, mercury). 2. Public Health Risks: Scientific evidence links exposure to these pollutants with cancer development, endocrine system disruptions, neurotoxicity, and respiratory illnesses such as asthma and chronic obstructive pulmonary disease (COPD). 3. Soil Contamination: Airborne toxins deposit onto agricultural soil, reducing its fertility and contaminating local crops, which may enter the food chain. 4. Water Pollution: Persistent organic pollutants (POPs) and heavy metals can leach into groundwater or run off into surface waters, compromising essential water resources. 5. Bioaccumulation in Food Chain: Contaminants from soil and water are absorbed by crops and livestock, intensifying toxicity levels in meat, milk, and eggs consumed by humans. 6. Persistent Environmental Pollutants: Dioxins and heavy metals are long-lasting, remaining harmful for decades and causing ecological damage. 7. Economic Threat to Agriculture: Contamination may render nearby produce unsafe for consumption with its inherent complications to people. 8. Irreversible Damage: Chronic exposure and pollution could lead to generational health issues, biodiversity loss, and irreparable harm to natural resources. For these reasons, I urge the rejection of this application to protect public health, the environment, and Malta's agricultural and economic stability.	
43.	Individual 43	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am entirely against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is to no use to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. together.	Refer to response provided to Individual 1.
44.	Individual 44	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Salina, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Not to mention that this project will create a great inconvenience to the resident of Salina, even more than is currently being created by the terrible state of the Maghtab plant. For the wellbeing of the residents of Salina, I strongly plead that this project not go ahead and focus be placed on reducing the current odours being generated.	Refer to response provided to Individual 1.

45.	Individual 45	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people’s homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents’ quality of life and property values, as well as on Malta’s reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	Refer to response provided to Individual 25.
46.	Individual 46	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people’s homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents’ quality of life and property values, as well as on Malta’s reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	Refer to response provided to Individual 25.

47.	Individual 47	Morning, I object to the approval of this application on the basis that; 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
48.	Individual 48	To eia.malta@era.org.mt Cc representations@pa.org.mt Re PA/06096/23 (EA/00020/22) Thermal Treatment Facility Object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do.	Refer to response provided to Individual 4.
49.	Individual 49	Dear All, I Object to the approval of this application on the basis that	Refer to response provided to Individual 4.

		1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. Authorities should not review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I strongly urge you to consider these objections and I look forward to receiving a confirmation receipt of this email.	
50.	Individual 50	Dear Sir/Madam, I am writing to express my strong opposition to the proposed Waste-to-Energy project that includes the construction of a hazardous waste incinerator close to residential communities. While I fully recognize the need for Malta to manage waste sustainably, building an incinerator of this nature near people's homes raises serious concerns about public health, air quality, and environmental safety. Numerous studies have shown that hazardous waste incineration can release harmful pollutants, including dioxins and heavy metals, which are linked to respiratory illnesses, cancer, and other serious health issues. Locating such a facility close to where families live, work, is unacceptable and irresponsible. Furthermore, this project could have a profound negative impact on residents' quality of life and property values, as well as on Malta's reputation for promoting a clean and healthy environment. Alternative waste management strategies, such as greater emphasis on reduction, recycling, and non-toxic waste treatment technologies, should be prioritized over incineration. I respectfully urge you to reconsider the location and nature of this project, engage in meaningful consultation with the affected communities, and ensure that public health is placed at the forefront of any future plans. Malta deserves a modern, safe, and truly sustainable waste management solution—not a hazardous incinerator imposed on its residents. Thank you for your attention to this important matter.	Refer to response provided to Individual 25.
51.	Individual 51	Dear board members, It makes no sense to build this facility at the proposed location, given that the North West and the West are the prevalent winds in the Maltese islands, meaning that on most days emissions will be directed towards nearby towns and villages.	The air dispersion of the incinerator has been formulated thanks to computer models that rely on realtime weather data and geographical information, such as the prevalent wind conditions in Malta. The results obtained from the model are explained in our response to Individual 6.

		incinerator plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion, one has to assess these plants 'cumulatively' i.e. TOGETHER.	
58.	Individual 58	To whom it may concern, I refer to the PA 6096/23 consultation notice that has just come to our attention and that we regretfully were therefore not in a position to attend. As a resident of Gharghur where I reside with my family and 3 young children aged 2, 6 and 8 respectively, we are extremely concerned about potential health hazards of this proposal. The facility is located less than 2 Km from our village, and directly in the path of the predominant Majistral wind that will inevitably end up dumping any toxic fumes right on us. Clearly with us being situated on higher ground, the proposed 25 m chimney will make no difference to mitigate the issue and if anything, directing fumes more on our direction. Further to the concerns stated above, in the assessment of the EIA, alternative locations assessed did not analyze alternative locations on the island, despite potential benefits of citing such a facility away from residential areas like Naxxar, Gharghur and Bahar ic-Caghaq which lie in the path of the prevailing NW winds. The alternative location assessment disrespects the spirit of this section of an EIA, whereby it is meant to assess other geographical locations on the island. An omission, which is not justified in anyway, given that the entity is a governmental one with potentially many other optional sites available to assess elsewhere on the island. We strongly urge that a more appropriate site is elected that would not dump toxic fumes on the various villages downwind of the facility. Kindly include us as official representees and keep us updated with the application process to be in a position to submit further representations and appeals as may be necessary. Understandably, should this proposal in any case go through despite the evident health hazards to residents in the area, we will be holding the persons / authorities accountable accordingly. We will certainly not compromise with the health of our children and other residents in the area.	Kindly refer to response provided to Individual 6 & Individual 22 regarding your concerns on air quality and public health impacts. Kindly refer to response provided to Individual 4 regarding alternative site assessments.

		I thank you for your consideration,	
63.	Individual 63	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is not done correctly, to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively".	Refer to response provided to Individual 1.
64.	Individual 64	Dear Sir/Madam, Further to the recent ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as residents of Naxxar and members of the Naxxar Neighbours Group we hereby declare that we are not in favour of the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for our decision is that the impact assessments that have been carried out are being assessed on an individual basis. To be meaningful, one has to assess the proposed plants cumulatively.	Refer to response provided to Individual 1.
65.	Individual 65	Good evening, Further to the public consultation held a few days ago, I would like to express my concern regarding the proposed Thermal Treatment Facility. I am a resident in the vicinity of the proposed plant since I live in Naxxar, and can attest first-hand to the wind-borne pollution from which we suffer constantly, with the emissions from the current Maghtab in one direction and the constant wind-borne dust from the quarries in the vicinity. The additional emissions of this proposed incineration activity will add more dangerous wind-borne emissions, among these dangerous metal oxides, nitrogen oxides and sulphur oxides. Apart from the direct impact of the emissions, the released particulate matter will settle on land and water, impacting soil and surface water quality, as well as groundwater. This will lead to the contamination of any food growing in the area apart from affecting the water supply. Several international studies have been made public regarding the contamination produced by Incinerators. Among the hazards scientifically established, direct correlation to increased incidence of cancer and neurological diseases have been identified. I strongly petition that this development is not built, for the health of our current and future generations. I thank you for your consideration,	Refer to response provided to Individual 62.

		I have also carried out a quick research about Incinerators and the effect on the vicinity and it is very worrying. https://www.nottinghamshire.gov.uk/media/110343/kc8-the-health-effects-of-waste-incinerators-4th-report-of-the-british-society-for-ecological-medicine-second-edition-june-2008.pdf	
74.	Individual 74	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
75.	Individual 75	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. I must point out that the impact assessment carried out is useless to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants cumulatively, i.e. together.	Refer to response provided to Individual 1.
76.	Individual 76	I am writing in regards to the Proposed Thermal Treatment Facility in the Ecohive Complex 06096/23. It is expected that the biggest impact of the incineration activity will be through aerial emissions, with a major adverse impact rather than the stated moderate adverse impact. These may include flue gas, metaloxides, nitrogen oxides and sulphur oxides which might have significant ecological and socio-economic implications on areas present in the windward direction^{1,2}. A comprehensive air dispersion model is required to assess the potential impact of emissions from the proposed incinerator on ambient air quality. We suggest expanding the buffer zone to account for the extent of aerial pollution rather than the standard 100 meters. This is anticipated to have a detrimental effect on the quality of life for residents near the proposed site. The released particulate matter can settle on land and water, impacting soil and surface water quality, as well as groundwater. This may lead to bioaccumulation in plant species. Given that the proposed scheme is within an Agricultural Value area, it's crucial to consider this impact, particularly since it's generally advised to avoid growing food near inc	

80.	Individual 80	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	Refer to response provided to Individual 4.
81.	Individual 81	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Salina, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Not to mention that this project will create a great inconvenience to the resident of Salina, even more than is currently being created by the terrible state of the Maghtab plant. For the wellbeing of the residents of Salina, I strongly plead that this project not go ahead and focus be placed on reducing the current odours being generated.	Refer to response provided to Individual 1.
82.	Individual 82	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Salina, I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. Not to mention that this project will create a great inconvenience to the resident of Salina, even more than is currently being created by the terrible state of the Maghtab plant.	Refer to response provided to Individual 1.

		For the wellbeing of the residents of Salina, I strongly plead that this project not go ahead and focus be placed on reducing the current odours being generated.	
83.	Individual 83	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Victoria Gardens, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is useless once the plants are being assessed on an individual/separate basis. To come anywhere close to the correct conclusion and before being able to form a proper opinion one the matter one has to assess these plants as one, that is together and not separate.	Refer to response provided to Individual 1.
84.	Individual 84	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
85.	Individual 85	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.

86.	Individual 86	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. I strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been salami-sliced with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. I urge the authorities not to review the application until a proper impact assessment is undertaken in line with the spirit of what an EIA and SIA should do. I thank you for your consideration.	Refer to response provided to Individual 4.
87.	Individual 87	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER.	Refer to response provided to Individual 1.
88.	Individual 88	Dear Sir/Madam, Further to last Wednesday's ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants "cumulatively" i.e. TOGETHER. I would also add as I have previously stated that common sense would dictate that if the prevailing wind is from the northwest that the incinerator would be better located in the south of the island so that the sea is downwind of the incinerator and not Malta and a good portion of it being densely populated being downwind of it.	Refer to response provided to Individual 1.

		The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER	
95.	Individual 95	Reference is made to application PA/06096/23 (for thermal plant) and its related Environmental Impact Assessment. We strongly object to the approval of this application on the basis that 1. A holistic EIA including cumulative impacts is absent 2. There is no proper assessment of alternative locations 3. There is no social impact assessment. The project assessment seems to have been split up with a waste-to-energy plant approved in 2022 following an EIA, now one for clinical and abattoir waste with a separate EIA and then the possible relocation of the organic waste plant from M'Scala. The sites considered were all at the ECOHIVE: the area to the North East of the proposed site, the area to the West of the proposed site, the Area adjacent to the proposed site. Locating everything on one site close to localities where people reside will surely increase the concentration of emissions leading to higher risk of exposure and impact. Monitoring for possible cumulative impacts will not solve the problem once the investment is already made. For the above reasons, we urge the authorities to refuse this application.	Refer to response provided to Individual 4.
96.	Individual 96	Dear Sirs/Madams responsible, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Bahar Ic-Caghaq I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.
97.	Individual 97	Dear Sir/Madam, Further to last Wednesday’s ERA consultation meeting regarding PA/06096/23 (EA/00020/22), as a resident of Madliena, Swieqi I hereby declare that I am TOTALLY against the construction of the proposed Thermal Treatment Facility and any other waste incineration plant at Maghtab. The main reason for my decision is that the impact assessment carried out is USELESS to the extent that plants are being assessed on an individual basis. To come anywhere close to the correct conclusion one has to assess these plants “cumulatively” i.e. TOGETHER.	Refer to response provided to Individual 1.

